

Comments	How comment dealt with
Concern has been expressed over expectation of translocating PD's into historic range on BLM land. Recognize this would likely require a NEPA document, review of conformance with the existing LUP, and coordination/collaboration with other public land users, such as permittees. Also in 2.4.2.1. (pg 169)	CDOW recognizes that translocation efforts on BLM lands will require a NEPA document. Currently in the document, translocation efforts are identified as a possible tool to restore historic populations. Selection of this tool in individual population areas and clarification of detail will be worked out during the development of action plans at the IPA level. Please see the new Implementation Process (page 176).
Editorial- last sentence, "Fragmentation and loss of habitat can disrupt the entire..." (word out of place)	Fixed
Editorial- Strategy 2.1.1.3: Last sentence- delete 2nd "in" (before GUPD & WTPD range).	Fixed
Editorial: 2nd paragraph, first sentence, delete "be" before 'correspond with high...'	Fixed
Uranium activity has slowed again now that prices have dropped dramatically (of course if they go up again so will the activity) Probably should add statement about the volatility of all energy markets. Although recent increases have presented concern with future development, there is no certainty what level of development will actually occur.	Agree--added the following to both the GUPD and WTPD sections--"Uranium activity has slowed since the fall of 2008 with a decrease in prices, but is expected to accelerate as the current economic recession fades and as the search for alternative energy sources intensifies."

<p>Background, para 1, sent 3: I think it should be recognized somewhere that the ecological complexion of the country has changed and admit that even white-tails appear to aggravate the spread and entrenchment of invasive annuals.</p>	<p>Added discussion in Rangeland Condition Section (Page 154): 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 on 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 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 differences of 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 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. However, continued research is needed to adequately address the impact of GUPD and WTPD colonies on the landscape.</p>
<p>Competition, last para, sent 1: Just a comment: Wyoming ground squirrels in northwest Colorado tend to live in colonies far more dense and discrete than WTPDs.</p>	<p>Thank you for your comment.</p>
<p>Background, para 2, sent 1: "WTPDs in Colorado <i>are being</i> impacted..." The lease status of these habitats is not a new development as is improperly implied. It would be more accurate to state that, compared to GUPD, more acres of WTPD habitat has potential to be impacted...</p>	<p>Fixed as stated</p>

<p>Background, para 3, sent 5: "As an example of how an increase in drilling <i>will directly affect</i> WTPD range" I don't understand where this information is being derived, but to my knowledge, and with the exception of the Rangely Oil Field, absolutely none of the so-called new drilling activity has affected prairie dogs in the WRFO. Since the distribution of activity associated with the new drilling surge has yet to coincide with any WTPD habitats in the WRFO, how can direct impacts or meaningful trends be extrapolated?</p>	<p>As the reviewer states, outside of the Rangely Oil Field, the number of new APDs affecting occupied WTPD range is negligible. Within the Rangely Oil Field, new applications for production wells, injection wells, and pipelines continue to impact occupied WTPD habitat. Also, new APDs being issued in Moffat County in the Hiawatha and Powder Wash areas are within occupied WTPD range, in many cases. The paragraph the commentor cites was removed from the plan. Additional clarification was added to the description of oil and gas development in the NW IPA on page 125 to reflect the slight overlap of current development activity in the White River BLM Field Office with WTPD range. As for assessing direct impacts and meaningful trends in prairie dog populations affected by oil and gas development, both the introductory paragraph in the energy section (p. 115) and the opening paragraph under the Possible Impacts heading (p. 123) describe the uncertainty surrounding impacts of energy development and call for further study.</p>
<p>Background, para 1: The relevance of this paragraph is lost on me. The intent of the paragraph is apparently meant to disclose the impending threat of oil shale development and its cumulative influence on prairie dogs. In the Piceance Basin, arguably the epicenter of potential development in the States, there are no prairie dogs in the area slated for potential development.</p>	<p>The Green River geologic formation and three Oil Shale Basins do overlap WTPD habitat in northwestern Colorado. The primary area of overlap is where the Washakie Basin overlaps habitat in northwestern Moffat County. Two smaller areas of overlap with WTPD range occur where the Uinta Basin overlaps WTPD habitat in and around Coyote Basin in Rio Blanco County and where the Piceance Basin extends north of the White River in Rio Blanco and Moffat Counties; however, the "Most Geologically Prospective Oil Shale Resource" areas identified in the 2008 Final PEIS (those areas where development activity is likely to occur in the foreseeable future) do not overlap WTPD habitat in Colorado. The strong possibility that associated infrastructure development will affect WTPD in northwestern Colorado remains, though. True--prairie dogs do not occur in the Piceance Basin, where oil shale development is most likely to occur. The Washakie Basin resource could potentially affect WTPD habitat, but was not opened for leasing by BLM in the Programmatic EIS. Added language to end of paragraph (page 119) - "However, authorized oil shale leasing and potential development in Colorado is limited to the Piceance Basin and is located outside WTPD and GUPD habitat. Leasing and potential development of oil shale resources in the Washakie Basin , which lie under WTPD habitat, was not authorized by the Oil Shale Programmatic Environmental Impact Statement completed by the BLM in 2008."</p>

<p>Possible Impacts of Energy and Mineral Development, para 1, sent 1, item 3: I wonder if the scientific community is certain, under the same rigorous standards as we require of our critics, that habitat fragmentation is a relevant and/or operative topic under reasonably foreseeable drilling scenarios? Much of the new development being touted as having severe consequences on prairie dogs occurs at a pad density of between 4 and 16 pads per section. Based on the apparent long term response of prairie dogs in the Rangely Oil Field's 32 to 128 pads per section (and attendant pipeline and road network)--I think we should be careful in ascribing some kind of area-specific tolerance/threshold or genetic barrier to such development.</p>	<p>The sentence the reviewer is referring to simply identifies " fragmentation of available habitat" as a possible consequence of oil and gas development. Reasoning: Fragmentation is simply the creation of discontinuities in available habitat, and energy-related road development certainly creates this in WTPD habitat. The population-level response by WTPD to this fragmentation is quite speculative. The long term response on the Rangely Oil Field, which the reviewer refers to, is that WTPD have persisted, but no quantitative data on pre- and post-development abundance, vital rates, or colony connectivity is available. The authors have not "ascribed some kind of area-specific tolerance/threshold or genetic barrier to such development" as the reviewer cautions against. There is no research that measures the effects of energy or mineral development on WTPD or GUPD and high quality, peer reviewed studies of oil and gas impacts are needed. In addition, there are examples of long-term coexistence of WTPD and oil and gas development (e.g., the Rangely Field), although there are no before and after comparisons of WTPD density, occupancy, or demographic rates in these co-existence areas either. Fragmentation of habitat is believed to be generally negative for a wide variety of wildlife species occupying a wide variety of habitat types, and it is appropriate to raise it as a concern for WTPD and GUPD until it can be disproven. Add the following language to this section: "There are presently no empirical studies that quantify the occurrence, severity, or persistence of these or other effects of oil and gas development on WTPD and GUPD. High quality, peer reviewed studies are needed to evaluate these potential impacts."</p>
<p>Possible Impacts of Energy and Mineral Development, para 1, sent 2: Much of this information is dated. Modern pads are much larger than 2 acres, but if multi-well pads, they are typically more widely separated, not more closely spaced. The increased number of wells drilled is basically an irrelevant metric in this case. And again, the authors should carefully document their information source, because there are no current proposals, indications, or trends for drilling activity in any prairie dog habitats within the WRFO. It would be useful to document where and to what degree this is actually happening.</p>	<p>In referring to recent BLM White River Field Office Environmental Assessments for pads in the Rangely field (primarily oil), as well as talking to a biologist from the BLM Little Snake Field Office in regard to new pads being built in the Hiawatha field (primary gas), average pad size for both was 2-3 acres. The reviewer notes that modern multi-well pads are larger, but occur at less dense spacing, which is true. Much of the current energy activity incorporating multi-well pads in the WRFO that the reviewer refers to is in the Piceance Basin, outside of current occupied WTPD habitat. With respect to current or proposed drilling activity there is increasing activity in Moffat County, with apparent plans for more energy activity within WTPD habitat in North Park as well. In addition, recent leasing of WTPD habitat in the WRFO indicates some level of interest in pursuing those leases (or else they wouldn't have sold). Commodity prices will likely continue to dictate whether exploration occurs in the more marginal oil and gas areas of the WRFO. The Northwest IPA is within the Little Snake Field Office.</p>

<p>Possible Impacts...Colorado, para 1, sent 2: "Specifically, the IPAs <i>most impacted</i> or..." In those lands and habitat administered by the White River Field Office it would be far more appropriate to list our habitat acreage with a modified 3rd sentence--<i>but field development is not occurring, and may never occur at a level causing concern...</i>". See also Responses for page 105.</p>	<p>There is extensive overlap of both (1) oil and gas (Figs. 19 and 20); and (2) mineral leases (Figs. 23 and 24) within GUPD and WTPD occupied habitat in Colorado. Specifically, those IPAs most at risk of potential impact include for GUPDs: SW and LPA, and for WTPDs: GVUN, NP, and NW populations. Populations located in these areas are identified by the BLM as having high oil and gas potential resources, but field development is not yet occurring at a level to cause concern for prairie dog populations. It is true that modern, multi-well pads can be substantially larger than 2 acres (often 5 acres in size)--see corrections made in response to comment 4 above. The reviewer is correct that well numbers on multi-well pads are a poor measure of impact. This portion of the comment is addressed by changing "oil and gas wells" to "oil and gas well pads". Multi-well pads are becoming more prevalent, particularly in the Piceance Basin (outside WTPD habitat), but most of the pads elsewhere in WTPD and GUPD habitat are not high density, multi-well pads. The reviewer is also correct that little current development is occurring within the WRFO, but there continues to be interest in additional leasing in portions of the area. However, there are plans in development for oil and gas drilling in prairie dog habitat in Moffat, Jackson, La Plata and other counties. This paragraph is modified to read (page 123), "The final footprint of individual oil and gas well pads often affects less than 2 acres, but initial well pad construction and the development of new road and pipeline corridors can add substantial disturbed acreage for each well pad constructed. Multi-well pads are larger and often result in a 5 acre footprint. Multiple-well pads are increasing in application, but are still rare outside the Piceance Basin in northwestern Colorado and in the southwestern corner of Colorado. For instance, relatively dense oil and gas development occurring in the Hiawatha Field, located in northwestern Moffat County, is primarily conducted from single well pads. Individual oil and gas wells can affect an area averaging less than 2 acres, but wWith the potential for close spacing of wellswell pads, and significantly more wells well pads proposed within both GUPD and WTPD range, this oil and gas development has the potential to significantly decrease the amount of available prairie dog habitat." The second paragraph under the Possible Impacts heading on p.123 was modified to update pad size information. A more full description of oil and gas development in the NW IPA, developed from BLM planning documents is also added on pp.125-126.</p>
<p>Possible Impacts...WTPD, para 1, sent 2: The 1997 White River RMP and 2001 Wolf Creek ferret mgmt plan have specific provisions and objectives for the maintenance of prairie dogs, yes in the context of ferrets, but are these separable?</p>	<p>At least in these specific areas which are part of the ferret program, there is language that includes provisions for WTPD. Corrected to: The Little Snake and White River BLM Field Offices include BFF reintroduction areas and have stipulations related to BFF habitat (i.e., WTPD colonies) which helps address WTPD conservation in the context of maintaining healthy populations in order to maintain BFFs.</p>

<p>Possible Impacts...WTPD, para 3, sent 3: Comments for pages 67, 105, and 114 pertain here as well. Might also be instructive to use your sources to determine how many active wells are in areas identified as having medium development potential, and those in prairie dog towns encompassed by areas having high development potential.</p>	<p>This is depicted visually in Figure 20. The section describing oil and gas development in the NW IPA. is modified to read (page 125), "Recently, oil and gas development activity has increased in the NW IPA. Both the White River and Little Snake BLM Field Offices (in the NW IPA) experienced growth in oil and gas development over the past several years. The pace of oil and gas development slowed in portions of Moffat County in 2008 and slowed considerably across the range beginning in the late fall as a result of the economic recession, however. Oil and gas development is expected to accelerate with improving economic conditions, though perhaps not to the level experienced through 2007. The 20-year forecast for oil and gas development in the NW IPA calls for significant growth. Oil and gas development of federal mineral estate in the BLM Little Snake Field Office is projected to reach 3,031 wells drilled in the 20 years from 2007 to 2027. Drilling activity in the Little Snake planning area resulted in 594 wells drilled over the previous 20-year period (BLM 2007). Drilling activity on federal mineral estate in the BLM White River Field Office is currently projected to reach 17,000-20,000 wells drilled within the next 20 years. The previous 20-year estimate of drilling activity in the White River planning area projected that 1100 oil and gas wells would be drilled between 1997 and 2017 (Bureau of Land Management 2006b). However, the vast majority of the wells anticipated in the White River Field Office will occur outside WTPD habitat."</p>
<p>GIS Analysis Results, para 1, sent 1: "WTPDs in Colorado <i>are being impacted ...</i>" Comments for pages 67, 105, and 114 pertain here as well.</p>	<p>Fixed as stated</p>
<p>GIS Analysis Results, Conclusion, para 1, sent 3: "<i>WTPDs in Colorado are being more heavily impacted...</i>" Comments for pages 67, 105, and 114 pertain here as well.</p>	<p>Edited as needed</p>
<p>Energy and Mineral Development Conservation Strategies, Strategy 4.1.1.3: Rangely oil field--no natural gas that I'm aware of.</p>	<p>Yes, the Rangely Field is an oil drilling area, not natural gas. Was corrected in Strategy 4.1.1.2.</p>
<p>Energy and Mineral Development Conservation Strategies, Strategy 4.2.2.4: I think we should be careful in promoting the use of phased/concentrated development scenarios as a panacea for all wildlife issues. Depending on the distribution and extent of a habitat base, the mobility of a species, and the density and extent of development, we really could be setting the stage for insular effects and our need to intervene to restore populations.</p>	<p>Like any tool (any of the conservation strategies in this plan in fact), phased development is not appropriate in all circumstances or locations and will need to be applied with discretion, professional judgement, and judicious application of adaptive management principles contained in this plan. Strategy modified to read, "...phased energy development, where appropriate, in GUPD and WTPD habitat."</p>

<p>Rangeland Conditions, Invasive Weeds, para 1: also need to recognize that growing season long use on a limited perennial forage source (by prairie dogs on arid ranges) likely affects plant vigor and aggravates the spread and entrenchment of invasive weeds.</p>	<p>Added discussion in Rangeland Condition Section (page 154): 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 on 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 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 differences of 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 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. However, continued research is needed to adequately address the impact of GUPD and WTPD colonies on the landscape.</p>
<p>Rangeland Conditions, Conclusion, para 1, sent 3: more accurately stated: ...reducing intensity <i>and altering the duration or timing</i> of grazing...</p>	<p>Changed as stated</p>

<p>Rangeland Conditions, Conclusion, para 1, sent 3: interesting to note that WRFO is finding it challenging to restore perennial grasses and forbs on degraded ranges (arid upland situations) occupied by prairie dogs, which make heavy use of emerging vegetation growth.</p>	<p>Added discussion in Rangeland Condition Section (page 154): 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 on 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 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 differences of 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 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. However, continued research is needed to adequately address the impact of GUPD and WTPD colonies on the landscape.</p>
<p>Rangeland Conditions, Rangeland Condition Conservation Strategies, strategy 9.1.1.5: <u>determine the effect of <i>forage</i> (rather than habitat?) enhancement...</u></p>	<p>Did not alter habitat to forage because enhancement projects are to improve habitat for forage, for cover and for all other life history needs of a species.</p>
<p>Rangeland Conditions, Rangeland Condition Conservation Strategies, strategy 9.8.1.7: <u>To avoid the appearance of single-spp mgmt, I think this strategy should precede the others or, better yet, be integrated with objective 9.8.1</u></p>	<p>Incorporated statement "while protecting associated species needs."</p>
<p>Recreational Shooting, Background, para 3, sent 1: <u>..and to take <i>large</i> (rather than significant) numbers...</u></p>	<p>Changed as stated</p>
<p>Recreational Shooting, Colorado, para 1, sent 1: <u>peak shooting pressure could probably be safely extended from April though June.</u></p>	<p>Extended the dates in the plan</p>
<p>Issue Ranking, Results of Issue Ranking, full para 2, sent 3: <u>Again, I question the "observable significant disturbance" in the context of prairie dogs at the present time. Comments for pages 67, 105, and 114 pertain here as well.</u></p>	<p>Original implementation process has been removed. The implementation process now is to allow stakeholders within individual IPAs to rank issues and strategies for the development of on the ground action plans.</p>

Acknowledge where management for some species/habitat or stipulations may provide conservation measures for PDs.	We have acknowledged that sage-grouse treatments may benefit GUPD and WTPD. This detail can be worked out at the local IPA level.
need to provide references for figures and charts used to demonstrate discussion points	Added reference to Table 15 so that the reader is aware of where the data came from and what year it was reported.
objective 9.1.1 need to address restoration of conditions. Add strategy to apply research findings by developing appropriate mitigation standards focused on achieving rangeland conditions that will support PDs.	Added strategy
what is meant by pre-project planning of ea's ??? Clarify intent and timing of this strategy..	This detail will be developed at the local level through the new Implementation Process (page 176).
need to identify where other habitat management overlaps with PD habitat and provides appropriate/ sufficient conservation.... Even though most LUPs do not have specific stipulations related to PDs, BLM still considers impacts to this species at the local level and may modify project design to accommodate habitat objectives.	This can be determined at the local IPA level with the new Implementation Process (page 176). This level of will be incorporated into IPA priority Action Plans.
The strategies and objectives were layed out well, including the background of the species, the issues, and the past impacts to each population. The process of how the conservation plan was initiated and developed was identified well. And it outlined what the next steps are going to be. The only concern I have is- realistically how are we going to implement the additional workload. I liked the way the objectives were derived and how that was tied back to the public involvement process	The Implementation Process (page 176) will result in the development of a 3-5 year action plan that will outline who is responsible for the work, where the funding will come from, and who will evaluate the status of the project.
2nd para. Under Background- delete paragraph- exact duplicate of last half of 1st para.	Deleted paragraph
2nd para. Last sentence, confusing- rewrite. 'In addition, new roads may need to be constructed to support operations due to the need to facilitate transport of material.' ?	Clarified paragraph
Colorado- first paragraph. As stated earlier last sentence is confusing. But paragraph, as stated, suggests development in SW, LPA, GVUN, NP, and NW is currently occurring at 'a level' that is causing concern or impacts to PDs. (rather than potential impacts) Based on what documentation or science? Is this overstated?	Reworded paragraph: There is extensive overlap of both (1) oil and gas (Figs. 19 and 20); and (2) mineral leases (Figs. 23 and 24) within GUPD and WTPD overall range in Colorado. Specifically, those IPAs most at risk of potential impact due to these disturbances include for GUPDs: SW and LPA, and for WTPDs: GVUN, NP, and NW populations. These areas are identified by the BLM as having high oil and gas potential resources, but field development is not yet occurring at a level to cause concern for prairie dog populations.
GUPD-1st seen, '...none of which currently has stipulations <i>specifically</i> to protect GUPD habitat from oil and gas development impacts.'	We agree that these 5 BLM Field Offices likely have other stipulations (for instance, for raptors or GUSG) that end up protecting GUPD habitat as well. This level of detail is not needed in the CCP.
last paragraph, 2nd sen, (play is estimated to be 10-80 MMboe)- what is your source? Per com, report?	New sentence: "These data provide evidence that if BTPDs are protected from landscape-scale eradication efforts they can rebound, implying similar potential for GUPDs and WTPDs if colonies are located sufficiently across the landscape to allow migration among colonies."
1st paragraph, WTPDs in Colorado 'are being impacted'... shouldn't it state, 'have the potential to be impacted due to ...existing authorizations'?	Corrected as stated

Conclusion: earlier comments, suggest 'However, WTPDs are being more heavily affected by O&G...'	Included suggestion; however, the WTPD overall range has a greater potential for oil and gas development than the overall GUPD range.
Editorial: 2nd bullet, delete first 'be'	Corrected as stated
9.8.1.7- (pg 147) good example of integrating PD needs with needs of other species. Overall plan needs to integrate or consider PD management actions with those of other species. Possibly adding strategies similar to above, that say consider PD habitat needs in project and management implementation for other species in potential or existing habitat.	This is a prairie dog conservation plan. Species associated with a healthy prairie dog ecosystem will benefit from implementation of strategies that work to conserve this system.
9.4.1.1 - Maybe add statement to integrate PD needs into grazing mgmt designed to <i>meet land health standards</i> . I know that is BLM terminology but it manages for healthy rangelands rather than one species. This will or could also provide a common goal to help reduce the effects of drought- if management focuses on the outcome, not the species.	Healthy landscapes should be the ultimate goal of all natural resource managers and agencies. A conservation goal here is to promote viable prairie dog populations as part of the healthy landscape. Species-specific management should only be implemented when specific threats have been identified and strategies exists to bolster species of concern population viability. Through this plan we are supporting prairie dog conservation over large landscapes where colonies would be regulated through natural predation, vegetation succession, and, likely, less periodic disease outbreaks. By maintaining this healthy ecosystem, associated species of the prairie dog system can also benefit.
Issue 2.3. Not sure this creates a limiting factor for the species. More research may be necessary on how differing designs actually affect populations.	True, we have not stated that this is a limiting factor.
Issue 2.4. Strategy 2.4.1.2. At first this should only be implemented on an experimental basis to prove that it is an effective and valuable management tool prior to wide spread implementation. Much of the cause/effect for this issue appears to be speculative.	This issue was removed from the plan.
The plan is rather emphatic that "the impact of plague on GUPD populations in Colorado has been documented. In 1941, GUPDs occupied an estimated 914,290 acres in South Park (Ecke and Johnson 1952). From 1947 to 1949, plague reduced the occupied habitat of this area to less than 5% of its former extent (Ecke and Johnson 1952)." Under "Disease Conservation Strategies" (I recommend renaming this section) starting on page 102 there is too much emphasis on research that probably isn't all that germane to the central issue of developing an oral vaccine as discussed on page 103. This is probably the single most important item to achieve with all of the state and federal agencies pooling their resources. Issue 3.4 items probably are not that important. Highlight up front on page 102 the vaccine matter. To achieve large extents of prairie dog colonies for prairie dogs themselves as well as associated species such as the black-footed ferret will require extensive areas of prairie dog colonies.	Strategies are not listed in a priority order. Please see the new Implementation Process (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 will be a one-page list of prioritized actions that has consensus from the stakeholder group involved. CDOW staff will participate to ensure the relevancy of the actions to conservation of prairie dogs.
In the last line on page, "can" should be placed before "disrupt".	Changed as stated
While populations in agricultural settings may have high densities, the plan should disclose that they are likely to be population sinks because prairie dogs will usually be destroyed by poisoning or plowing.	In the agricultural issues section the document discusses that prairie dogs populations can become fragmented and isolation of colonies can occur. In addition, the document does disclose that lethal control techniques are used to remove prairie dogs from these areas (page 95).

<p>While modeling shows that agriculture impacts 14% of GPD and WTPD overall range, the plan claims that this impact is significant only at a local not statewide scale. We believe a 14% range impact is significant, particularly when added to the extensiveness of sub/urban development and oil and gas drilling.</p>	<p>The claim was removed from the plan. In the plan, only the percentage of the overall range that is impacted is given.</p>
<p>The discussion of agriculture – particularly that prairie dogs negatively impact agriculture – fails to consider scientific literature which shows that the economic damage caused by prairie dogs has been overstated. CDOW has previously cited Derner et al. (2006)[1] as justification for prairie dog shooting on the basis of economic damage caused by prairie</p>	<p>We reviewed the Miller et al. 2007 article. The economic damage discussed in this article is referring to public lands, large landscapes and prairie dog competition with livestock. We do need to recognize that prairie dogs can cause problems for private landowners and that they should have the ability to control prairie dogs to maintain their livelihood. We do advocate non-lethal methods if they become available, but we cannot ignore the issues that private landowners face. We do not advocate poisoning on public lands or to reduce competition with livestock.</p>
<p>The plan indicates that control of Wyoming ground squirrels may be a potential conservation strategy where prairie dogs haven't recovered from plague. This would be a huge mistake. While we are concerned about the threat of plague to prairie dogs, this does not justify killing another native rodent, particularly one that is also impacted by plague, poisoning, and shooting.</p>	<p>We removed this strategy.</p>
<p>Management units, as well as intensive management measures should be identified in this plan. The plan should not be a plan for a plan.</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 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>In the 1st full paragraph, first line – delete “be” in front of “correspond”.</p>	<p>Changed as stated</p>
<p>The plan notes that poisoning, shooting, and habitat loss can compound the adverse impacts of plague on prairie dogs by causing isolation and thereby thwarting recolonization after plague. The plan fails, however, to provide effective means to reduce these anthropogenic threats and therefore reduce the impact of plague on prairie dogs.</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 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 plan's discussion of human health impact from plague does not differentiate between those cases caused by prairie dogs and those caused by other animals. Very few human plague cases are the result of contact with prairie dogs. Contact the Colorado Department of Public Health & Environment and U.S. Centers for Disease Control & Prevention for current statistics on this issue.</p>	<p>Provided additional information about human health concerns in the document under disease.</p>

<p>The plan discusses that the PVA shows that low frequency, high severity plague events, which is the norm with Gunnison’s prairie dogs, leads to very high extinction rates. It further notes that dusting dramatically decreases extinction risks. This underscores the need for the plan’s implementers to immediately undertake actions to reduce the threat to prairie dogs from plague.</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 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>Overall, we agree that plague is a significant, devastating threat to prairie dogs. While research is important to further refine strategies to curtail the threat, we know that 1) limiting other anthropogenic threats can limit isolation and thereby somewhat alleviate effects of plague; and 2) insecticide application can stop an epizootic or reduce its impact. Limiting shooting, poisoning, habitat destruction and other anthropogenic threats, alongside insecticide application, is therefore the crucial formula for providing prairie dogs a chance of persistence despite active plague throughout their ranges. The plan fails to promote or implement this formula.</p>	<p>This document is meant to serve as an umbrella guidance document and 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 Draft#2 of the CCP. 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.</p>
<p>The plan indicates that 35% of the white-tailed prairie dog’s range in Colorado has authorized or pending oil and gas leases. About 6% of the Gunnison’s prairie dog range in Colorado is affected. The plan also describes escalating oil and gas development, particularly, for the white-tailed prairie dog. Yet, the plan does not stipulate effective measures to address this threat. As a cooperating agency, CDOW has the ability to affect the land use plans that are up for revision throughout much of the range of both species. BLM regularly shows deference to state wildlife agencies when it comes to wildlife management. This plan should clearly call for lease stipulations and avoidance areas for prairie dogs.</p>	<p>CDOW does not regulate land use. See discussion of DOW authority in Introduction. 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 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 3rd paragraph on this page repeats the latter part of the 2nd paragraph.</p>	<p>Removed second paragraph</p>
<p>The plan provides a map of oil and gas development in Gunnison’s prairie dog range in CO. The key is insufficient, as it shows only potential resources and does not explain other shading/symbols on map.</p>	<p>The key was fixed to explain all symbols.</p>
<p>We’re pleased the plan recognizes the importance of the ESA in improving scientific information on which to make land use and other decisions. If these two prairie dog species were listed, we predict that the information on occupied acreage, population trends, and on other important issues would be much improved.</p>	<p>Thank you for your comment.</p>

<p>This sentence does not make sense: “Other populations are located in areas identified by the BLM as having high oil and gas potential resources, but field development is not yet occurring at a level not yet causing concern for prairie dogs.” We are guessing that the second “not yet” was unintentional. We disagree with the view, however, that field development is not yet causing concern for prairie dogs. The map of oil and gas development in the white-tailed prairie dog’s range shows quite clearly that this activity is proceeding apace, to the imperilment of this species.</p>	<p>Clarified sentence: These areas are identified by the BLM as having high oil and gas potential resources, but field development is not yet occurring at a level to cause concern for prairie dog populations.</p>
<p>The plan provides a good discussion of direct and indirect impacts of oil and gas and other mining activities on prairie dogs. It includes discussion of increases in this development pressure, as well as the general failure of federal plans to address these threats. The plan does not, however, then provide measures that will effectively reduce this threat.</p>	<p>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 in Draft#2 of the document (page 176). 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.</p>
<p>In other words, to protect the prairie dog ecosystem, the plan advocates preserving large blocks of prairie dog habitat. We couldn’t agree more, but the plan needs to tell us <i>how</i> this will be accomplished.</p>	<p>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 in Draft#2 of the document (page 176). 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.</p>
<p>Overall, we agree with plan’s sentiment that land managers should not wait until all the data are in on energy impacts to prairie dogs to take action – there is a need to take precautionary action. This means tangible, effective means of curtailing energy impacts to prairie dog populations and their habitat. Unfortunately, sufficient and tangible measures are not provided in the plan.</p>	<p>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 in Draft#2 of the document (page 176). 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.</p>
<p>We suggest that the plan be explicitly precautionary about poisoning. The plan admits scientific uncertainty: “Although poisoning has declined in recent decades, its impact on today’s smaller, more fragmented prairie dog populations remains an issue. There are no data that track the amount and location of current poisoning efforts on private or public lands, making it difficult to adequately assess the issue.” Given that there is uncertainty, but a suspected risk from poisoning, the plan should err on the side of conservation and provide effective ways of reducing prairie dog poisoning.</p>	<p>Use of toxicants is controlled by the Colorado Department of Agriculture. Through the implementation process, poisoning as a threat for prairie dog populations at the IPA level and appropriate conservation measures will be addressed.</p>

<p>The plan states that current poisoning is primarily for containment, not eradication. We do not believe that you have a basis for this statement, given that there is a lack of certainty about when, where, and at what scale prairie dogs are being poisoned in Colorado.</p>	<p>Removed reference to containment versus eradication.</p>
<p>The plan states that if prairie dogs are protected from landscape-scale eradication, they can rebound. We agree that protection from eradication will enable prairie dogs to better rebound, but the plan needs to recognize that current prairie dog populations are primarily scattered and isolated. Poisoning at a local scale can therefore result in large-scale extirpation, if the colony poisoned was the only remaining colony in a large area. Furthermore, the plan acknowledges that some populations like the Little Snake Complex have not rebounded despite the fact that poisoning has not occurred on BLM lands for some time.</p>	<p>New sentence: These data provide evidence that if BTPDs are protected from landscape-scale eradication efforts, they can rebound, implying similar potential for GUPDs and WTPDs if colonies are located sufficiently across the landscape to allow migration among colonies.</p>
<p>The plan mentions that the PVA recognizes a high risk of population extinction in 50 years even with less frequent poisoning (every 5 years), with isolated colonies would be at particular risk. The PVA shows there is a high risk of population extinction from poisoning even when assuming no threats from plague (p. G-23), which may be an unsupportable assumption given that plague encompasses the ranges of both species. The PVA also shows that large as well as small populations are at risk of extinction from poisoning (<i>Id.</i>). Yet, the plan does nothing to effectively address the poisoning threat.</p>	<p>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 in Draft#2 of the document (page 176). 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.</p>
<p>The plan states, “The PVA model showed that poisoning practices can greatly reduce the long-term survival of even the largest prairie dog towns, especially if poisoning is implemented on a frequent basis. Landowners, however, need to have tools to protect their lands and crops from damage caused by prairie dogs.” The plan has provided no basis for this statement. As we discussed above, the plan fails to discuss the extensive literature on prairie dogs and economic issues.</p>	<p>We reviewed the Miller et al. 2007 article. The economic damage discussed in this article is referring to public lands, large landscapes and prairie dog competition with livestock. We do need to recognize that prairie dogs can cause problems for private landowners and that they should have the ability to control prairie dogs to maintain their livelihood. We do advocate non-lethal methods if they become available, but we cannot ignore the issues that the private landowner faces. We do not advocate poisoning on public lands or to reduce competition with livestock.</p>
<p>The plan states, “CDOW does not support use of these toxicants being used on any prairie dog species, but authorization for use of these compounds falls under the jurisdiction of the Colorado Department of Agriculture.” The plan should clarify that the reference is to Rozol and Kaput specifically (although we would be quite pleased if CDOW objected to all toxicants that are used on prairie dogs).</p>	<p>Clarified that CDOW opposes the use of Rozol and Kaput on any prairie dog species.</p>
<p>Regarding the second strategy (6.3.1.4), we suggest that CDOW clarify that its comments will oppose the approval of these toxicants.</p>	<p>Added language that CDOW does not support the use of Rozol or Kaput and will oppose the approval of these toxicants.</p>
<p>In general, the strategies on poison are alarmingly ineffective in addressing the threat poised to prairie dogs. This is particularly striking given the results of the PVA analysis presented in Appendix G:</p>	<p>Strategies to address poisoning were developed at a stakeholders workshop. If during the Implementaion process new strategies are identified, they can be added to the list and implemented as appropriate.</p>

<p>The plan’s discussion of relocation survival rates, and its statement, “Survival rates of translocated prairie dogs are extremely low” does not consider recent scientific studies on relocation survival rates. Most notably, Long et al. (2006) record fairly high survival rates for relocated prairie dogs, although there is considerable variation.^[1] Shier’s research has shown that keeping family groups intact during relocation can increase survival rates by 5 times (Shier 2006).^[2] One reason for the very low survival rates in the Utah prairie dog translocation program (of less than 10%) may be that agencies involved make no effort to keep family groups intact. There are likely other reasons as well.</p>	<p>Paula Martin has conducted relocations of GUPDs and WTPDs in NM and CO. The Population Re-establishment section was edited to reflect the information we received from Paula.</p>
<p>The plan mentions SB 99-111, but fails to mention that this law has essentially brought relocation to a halt in the state.</p>	<p>Expanded upon SB-9911 in the Population Re-establishment section on page 138.</p>
<p>The plan delineates a principal relocation strategy of reestablishing prairie dogs in high priority areas that were previously occupied. The plan does not recognize that, without substantial government agency involvement and facilitation of prairie dog relocation, <u>this simply will not occur.</u></p>	<p>Expanded upon the SB-9911 statement on page 138 to show that we recognize the impacts of the state law.</p>
<p>Halogeton is misspelled.</p>	<p>Corrected as stated</p>
<p>The plan provides a very poor discussion of livestock grazing. For instance, it does not examine how livestock grazing exacerbates impacts of drought, altered fire, and noxious weeds. We have discussed the ample science exploring the threat of livestock and of livestock grazing’s intersection with these other threats elsewhere (Center for Native Ecosystems et al. 2002, Forest Guardians et al. 2004).</p>	<p>Section was updated as per all comments received.</p>
<p>This sentence needs more specificity: “Easements may be beneficial to conserve prairie dogs on these properties and help improve range conditions.” It does not specify what “these properties” are. In addition, as we noted in our comment regarding p. 82 easements are widely variable so the statement should be clear that easements with provisions to keep wildlife habitat intact and explicitly protect prairie dogs may be <u>beneficial.</u></p>	<p>Easement section was removed, as we do not have enough information on individual easements to make these data meaningful.</p>
<p>The stakeholder conclusions include: “The potential for listing of white-tailed and Gunnison’s [<i>sic</i>] prairie dog and related regulations could lead to losses within much of the livestock business. Succeeding land uses could be detrimental to prairie dogs and the related ecosystem function.” The first sentence is baseless – it disregards science showing that it may be more cost-effective for ranchers to leave prairie dogs alone, which is the most ESA listing could achieve. We discuss this above. Since the second sentence is premised on the first, it also falls.</p>	<p>This statement was a concern expressed by stakeholders during the stakeholder workshop in May and is portrayed as such.</p>

<p>Our concern is that the plan assumes current livestock grazing management is positive for prairie dogs. That is not a foregone conclusion. Rather, in some areas and at some times – particularly during drought – livestock grazing can harm prairie dogs. We therefore recommend Objective 9.2.1 and Strategy 9.2.1.1 be eliminated. At the least this objective should be reworded to focus on optimal grazing management for prairie dogs.</p>	<p>Strategies 9.2.1 and 9.2.1.1. will not be removed from the plan because this objective and strategy were developed during the stakeholders workshop. We believe strategies developed during this workshop should be maintained in the plan. Remember 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.</p>
<p>The plan indicates that shooting alone is not considered a threat, but it can be in intersection with other threats, such as plague. Yet, the plan does not reduce the threat from shooting to prairie dogs.</p>	<p>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.</p>
<p>The plan discusses how the PVA assumed mortality rates of 5-20% in analyzing the effects from shooting. We believe that this is an extremely low mortality rate assumption. We review the science on shooting in our 2007 petition to list the black-tailed prairie dog under the ESA (Forest Guardians et al. 2007).^[1] Not only do we show high mortality rates from shooting (including death rates of 75% or more), we also note a study which showed mass emigration of prairie dogs: after 22% of the population at a colony was shot, 69% of the remaining prairie dogs left the colony.^[2]</p>	<p>We believe the mortality figures are within the range of what can normally be expected and they were what was agreed upon by the experts. The PVA is a management decision support tool, not a method for analyzing every possible scenario. The PVA is not intended to provide accurate “answers” for what the future will bring for a given wildlife species or population just possible outcomes. 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>We object to these statements, which assume prairie dogs are causing economic damage: the plan describes DOW shooting regulations, which state, “A small game license is required to take GUPDs and WTPDs, with the exception of private landowners, their immediate family members, and designees who may take prairie dogs causing damage on their lands” and indicates on p. 150 that stakeholders say “Prairie dogs have detrimental impacts on property, making shooting a desirable method of population control under some circumstances.” As we discuss above, the plan fails to address the large body of literature indicating that prairie dog control may not be economically feasible, as prairie dogs cause negligible harm to rangelands.</p>	<p>Management of prairie dogs with lethal control methods on rangelands and on individual agriculture lands differ in their regard to economic feasibility. The authors of this document reviewed the Miller et al. 2007 article. The economic damage discussed in this article refers predominantly to public lands, large landscapes and prairie dog competition with livestock. Prairie dog densities on agricultural fields and their impacts are different than rangeland impacts. Their densities can be very high and can cause damage by consuming crops, interfering with irrigation and creating burrows. Individual private property owner's right to control prairie dogs as needed are respected. Many landowners have realized that control is not economically justified and have elected to stop poisoning. CDOW advocates non-lethal methods, but currently we are unaware of methods that will work for GUPD or WTPDs.</p>
<p>The plan states that maintaining the existing shooting closure is important. However, DOW does not discuss implications of that closure not extending to private lands. Biologically, it makes no difference whether shooting closure is on public or private lands. In addition, the conclusion to the shooting section states: “Lower rates of shooting-based mortality appear to be sustainable in otherwise demographically robust (i.e., plague-free) prairie dog populations.” There are no plague-free populations. Both species’ ranges are entirely covered by plague.</p>	<p>Maintaining lower densities of prairie dogs may help reduce the incidence of a plague epizootic. Shooting as a management tool can be used to decrease population numbers and may provide a better option than poisoning. It may also benefit landowners if a walk-on program that allows a landowner to charge for the right to shoot prairie dogs can be instituted. This may result in landowner desire to maintain populations on private lands.</p>

<p>The plan includes provisions for temporary shooting closures, with which we agree. However, the strategies are weak overall – “encourage” hunters to be better stewards, “evaluate” shooting closures. Even more alarming, the plan seeks to <i>promote</i> prairie dog shooting: We are flabbergasted that the plan includes these provisions, promoting a practice that threatens prairie dogs. These strategies should be eliminated.</p>	<p>The strategies as written, are intended to provide a range of possible tools to conserve prairie dogs, where the definition of "conserve" includes use. These strategies were developed at a stakeholder workshop to include all stakeholder and prairie dog interests to improve conservation.</p>
<p>The plan estimates that by 2020, urbanization will be a significant threat for Gunnison’s prairie dogs (38% of range is predicted to be impacted by low urban development), as well as for white-tailed prairie dogs (28% of range is predicted to be impacted). The extent of this threat should be overlaid or added to the extent of the threat from energy development (35% of the white-tailed prairie dog’s range; 6% of the Gunnison’s prairie dog’s range) and cropland conversion (14% for both species).</p>	<p>The impact to prairie dogs differs among issues. Maps showing cumulative impacts from all issues may be most relevant to the next status assessment. However, these types of maps become difficult to interpret, especially when we do not know how to quantify the true impacts associated with each issue. Showing each issue's potential impact on the overall range of the prairie dogs helps the reader gauge what may be occurring on the landscape with regard to conservation. This GIS analysis is a tool to be used to develop and implement conservation strategies for each issue.</p>
<p>Note that Section V ended on p. 164, but Section VI started on page number 162.</p>	<p>Page numbers fixed</p>
<p>In one paragraph of the plan agricultural conversion is termed detrimental and in another it’s termed positive. Agricultural conversions are not a long term benefit to PD even if these lands provide good forage. PD found adjacent to agricultural lands are there because the majority of their habitat has been destroyed and they had no other place to go. In time those colonies confined along the edges will be eradicated.</p>	<p>The document indicates that high quality vegetation can increase prairie dog density. More nutritious forage increases survivorship and litter size in prairie dogs. Private lands may be preferred habitat for prairie dogs as they occur on areas with higher quality soils. The CCP focuses on restoration of GUPD and WTPD on public lands. Public lands appear to have lost a greater proportion of colonies as compared to private lands. Public lands also provide an opportunity to conserve large colonies that will likely benefit associated species and maintain the ecological integrity of the prairie dog ecosystem.</p>
<p>If agricultural conversions have a positive effect and will truly recover prairie dog populations, then explain how. There may be some site specific and short term benefit but in the long run more agricultural conversions are not beneficial to PD. There is nothing wrong by saying so. This type of wording is scattered throughout the report in many issues.</p>	<p>This document is not a recovery plan. The document outlines potential strategies that can be implemented to conserve prairie dogs. The document indicates that high quality vegetation can increase prairie dog density and much of this high quality vegetation is on private lands. More nutritious forage increases survivorship and litter size in prairie dogs. Private lands may be preferred habitat for prairie dogs as they occur on areas with higher quality soils. The document focuses on restoration of GUPD and WTPD on public lands. Public lands appear to have lost a greater proportion of colonies as compared to private lands, but public lands provide an opportunity to conserve large colonies that will likely benefit associated species and maintain the ecological integrity of the prairie dog ecosystem.</p>
<p>Include a strategy in this section that would allow for the purchase of agricultural lands that either support or could support a large population of PD and manage it for their sole benefit.</p>	<p>Easements and CCAAs are included in the strategies.</p>

<p>At one time prairie dogs occupied up to 700 million acres of western rangeland, creating one of the largest ecosystems in the western United States. The number and variety of associated species this ecosystem must have supported would have been enormous. If one of the goals is to recreate this ecosystem on a large scale then some sort of acreage figures should be included in objective strategy number 2.1.1., page 92. If this is not one of the goals, then it should be.</p>	<p>This is not a recovery document but a conservation strategy. Recovery of prairie dogs on the scale mentioned is not a goal of this strategy. 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 in Draft#2 of the document (page 176). 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.</p>
<p>I'm not so sure there currently isn't an effective way to manage for plague on a large scale. Dusting on a large scale I believe can be accomplished with the use of aircraft. If hundreds of thousands of agricultural lands can be sprayed with pesticides and other chemicals there is no reason dusting for plague can't be done the same way. Once the application details are worked out with the applicator this can be done easily, quickly and cheaply.</p>	<p>Dusting not only kills fleas but all arthropods; if dusting is extensive, we could disrupt the insect community and those species dependent upon it. Large scale application is not feasible. Dusting of individual burrows is the only practical method that can be employed. Use of a systemic insecticide in an oral bait may be the best method for large scale management.</p>
<p>There should also be a goal in this section that identifies treating a certain number of acres or colonies each year. Treatment should be done whether or not plague is present. Take a more proactive approach.</p>	<p>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 in Draft#2 of the document (page 176). 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.</p>
<p>I don't understand why the committee seems to lack an understanding of the impacts of energy and mineral development and they feel the data related to energy and mineral development on PD and their ecosystem are insufficient to make any tough management recommendations. The conservation strategies should come up with tougher specific guidelines. The conservation strategies in this section are nothing more than a research, educate, study and monitor plan</p>	<p>There are no data currently available to evaluate the true impacts of oil and gas development on prairie dog populations. We need to start to monitor and conduct research to better inform our decision making process for conservation. 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 Draft#2 of the CCP. 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.</p>

<p>In table 15 on page 118, include another column showing the number of leased and pending leased acres that lie under occupied PD populations. Since all the acres in the IPA polygons are not suitable habitat this will identify how many of the remaining suitable acres not presently occupied by PD are leased or pending? This would give a better idea of what the real magnitude of the impacts are or will be to the existing populations.</p>	<p>Our mapping of occupied acreages is not adequate to attempt this type of analysis. None of the mapped acreage is ground-truthed, it is updated only once every 4 years, and it is not an exhaustive mapping survey effort.</p>
<p>Page 119, second paragraph. The lists of objectives developed by the workshop group are very vague. What does the maximum extent possible mean? Define what is a timely fashion? If one of the objectives is to increase the number of areas where conserving PD ecosystems is the primary objective, then say how many there are now and how many more you want and what size. These objectives don't appear to have been carried forward into the conservation strategy section.</p>	<p>Statements were maintained as developed at the stakeholders workshop in Grand Junction. Statements were only edited if clarification was needed.</p>
<p>Objective 4.3.1 on page 121 and the associated strategies are already stated in the associated species section. They seem out of place here.</p>	<p>Strategies in each section have a different emphasis. One is conserving prairie dog colonies and habitat with respect to oil and gas development and the other is restoring historic prairie dog ecosystems.</p>
<p>The primary objective of this section should be the development of a mandatory reporting system to the state in order to monitor and track any poisoning efforts of PD on private lands. Anyone getting the permit should at a minimum provide information on the size of the colony and its location. There is a much larger effort taking place on private lands to poison PD lands than the committee realizes. For example, when I attempted to compile this information for the Gunnison Basin to include it in my 2002 survey, individuals who were doing the poisoning refused to cooperate. There is no reason to believe that what is taking place in Gunnison is not taking place throughout the state. The committee should map out the active PD populations that occur on private land. This would then give them a better idea of what percent of the overall active PD population is being or could be poisoned.</p>	<p>Strategies were reproduced as developed at the workshop. 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 in Draft#2 of the document (page 176). 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.</p>
<p>Issue 6.2. The Gunnison and White Tail prairie dog conservation plan was developed to conserve these two species and to keep them from being listed. Yet under this issue the objectives are to better train and educate private landowners and poison applicators on how to use the poison more effectively in order to kill them. What's the benefit to PD from this objective?</p>	<p>Social acceptance of wildlife species is an important component of conservation. The purpose of this strategy is to safely use toxicants when necessary to control damage, and to minimize impacts to non-target species.</p>
<p>Include objective 8.1.1 on page 138 and objective 11.1.3 on page 159, and their strategies, into the poisoning conservation strategies section. There is no reason that these strategies cannot be used to relocate prairie dogs that are or could be poisoned on private land to public or other private lands that want them.</p>	<p>We are advocating moving prairie dogs for conservation and reestablishment of populations as a possible conservation tool. These opportunities may coincide with control actions and availability of animals for translocations. Some agricultural areas can serve as source populations, but since translocations are time consuming, costly and time dependent, our purpose for these efforts is population reestablishment. Administrative directive defines CDOW role in local control actions.</p>

<p>In table 20, in the poisoning line, break out the scope column by private and public. Give the public land a low rating and private land high.</p>	<p>This table will be removed from the plan and will be rebuilt during the stakeholder action plan development for each IPA. 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 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>Burrow distribution can be used to accurately delineate GUPD occupied habitat. As stated in the conservation plan, GUPD colonies are small and fragmented and I found this method to be easy and straightforward. I would like to see a comparison between the model prediction and the data I collected during my 2002 and June 2008 surveys for the Gunnison IPA before accepting the model as the only way to estimate the status of PD populations. The Gunnison IPA is small enough it wouldn't be difficult to do.</p>	<p>Mapping is not consistently accurate for GUPD or WTPD. We investigated several methods to map acreage state-wide (included in the plan) and all were non-repeatable and subjective, which led to the development of the occupancy approach. Occupancy Models allow for large scale monitoring and were chosen as the preferred monitoring tool across Colorado for monitoring conservation progress. Monitoring at the individual population scale across all IPAs and potential colonies is not feasible.</p>
<p>There are private landowners willing to take prairie dogs as well as large areas of public land that have not been formerly occupied that could support PD. Limiting reestablishment to only those areas that were formerly occupied will more than likely prevent the opportunity to rescue PD that will be either exterminated by poisoning or urban development. Don't limit reestablishment to only formerly occupied areas.</p>	<p>Until we have a better idea as to suitability of unoccupied habitat, we will focus reestablishment to previously known occupied areas. Reestablishment is difficult at best, and we want to make sure that we are putting prairie dogs into areas that contain suitable habitat based on previous records of occupation. Relocations will occur to achieve conservation goals.</p>
<p>On page 137, last paragraph, it says reestablishment efforts should primarily be directed towards sites where translocation is necessary to reestablish a large, formerly occupied population area. Large is not described. The majority of PD colonies in the Gunnison Basin and other GUPD IPA are small. It would be terrible to lose an opportunity to move GUPD to an area that was formerly occupied simply because someone thought it was not large enough.</p>	<p>The reference to large was removed. Your comment was correct, and we should consider moving prairie dogs to currently occupied areas if it will achieve our goals of population reestablishment and conservation of the prairie dog ecosystem.</p>
<p>Include a strategy that would permit moving prairie dog colonies that are threatened with extermination into or close to existing active colonies.</p>	<p>Translocations will be used primarily to meet conservation goals. GUPD translocations are very difficult and timing of movements is crucial to success. Thus translocations will be undertaken as part of a bigger conservation strategy not solely for rescue of colonies threatened with extermination.</p>
<p>In several of the conservation strategies regarding reclamation the plan calls for the use of native seed only. Don't limit yourself to only using native seed for projects.</p>	<p>There may be certain situations where use of non-native seed is appropriate; alternatives will be determined on a case-by-case basis through implementation plans.</p>

<p>If there is a need to collect information on the impacts and pressures of recreational shooting on PD, then why wasn't objective 10.3.1 included in the implementation process for this issue? Objective 10.3.1 lays out strategies that would begin the process of collecting information addressing some of the concerns identified in the stakeholder's workshop, but unfortunately it was not rated high enough to be carried forward into the implementation process</p>	<p>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 in Draft#2 of the document (page 176). 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.</p>
<p>I recommend that individuals who shoot PD should be required to get a free special license or permit. When shooting season is over, the license or permit would be returned to the Division of Wildlife. This will not only provide information on the interest of shooting PD but could also provide harvest data, identify which colonies are getting all the pressure, etc. This is the only way something like this can be monitored.</p>	<p>This is a potential future action for CDOW to consider in its regulatory process. Thank you for the recommendations.</p>
<p>Restrict shooting to only those towns that you feel are big enough and can support shooting without hurting the population and put the small towns off limits. This would also make it easier and reduce the work load on many District Wildlife Managers who probably don't have much time to worry about PD.</p>	<p>See strategy 10.2.1.5: Encourage hunters (e.g., through CDOW small game brochure) not to shoot prairie dogs on small, isolated colony sites, or in BFF release areas. Shooting closures are a regulatory tool and geographic closures should be considered especially during action plan development for IPAs.</p>
<p>Since PD shooting is justified based on a socio-economic basis, please explain the socio-economic benefits so people can put it into some sort of perspective. How much income does it provide to private landowners and to the Division?</p>	<p>We do not have specific data to address this question. This statement is taken directly from the stakeholder workshop.</p>
<p>Objective 10.2.3 says protect non-target species but it doesn't say how. The only strategy under this objective is to monitor lead in the environment. How does this protect associated species from being shot?</p>	<p>This strategy is meant to protect associated species from the secondary effects of shooting, namely exposure to secondary lead toxicity while scavenging shot PD carcasses. Direct take (shooting) of non-target species is prohibited by current regulations.</p>
<p>In all reality urban areas are not suitable habitat for PD So instead of spending a lot of time and money that could be used elsewhere trying to implement all the strategies in this section, concentrate more on the relocation strategies. It's the only realistic solution</p>	<p>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 in Draft#2 of the document (page 176). 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.</p>
<p>The committee should work to simplify the permit process. Start by eliminating having to get the accepting county's approval if PD are moved from one county to another.</p>	<p>We expanded on legal issues around relocation in the document. Communication & involvement with counties is a key to social acceptance of prairie dogs.</p>

<p>Page 166, strategy 7.1.1.2. What is the range-wide trigger that would increase sampling occupancy frequency from every 3 years to every 1 year? Is the PD situation to the point that sampling should be done every year? If the answer is no, how do you know? If you're not sure what is out there, and there are no goals in the plan identifying how many acres, colonies, etc., are needed to ensure a stable PD population, how do you know?</p>	<p>These issues are addressed in the Population Monitoring Section. The range-wide trigger is a 40% decline from the baseline range-wide occupancy survey. The 40% trigger was based on preliminary power analysis run on current occupancy levels in Colorado. A 40% change was the smallest decline that we could detect within an acceptable precision level. As more occupancy surveys are completed and we develop a better idea of range-wide occupancy rates and process variation, we can adjust this trigger if needed.</p>
<p>However, on page 162 the severity of energy and mineral development is ranked medium to high to "reflect the rapid pace of development and observable significant disturbance to the landscape, without understanding significant impacts to prairie dogs". This is a contradiction in the definition of high and medium severity. It does not seem appropriate to rank it as high severity based on the definition in Table 19, without understanding the impacts to prairie dogs and without the necessary scientific research to make conclusions. We would recommend defer ranking the severity until research has been conducted and the actual impacts of energy and mineral development are better understood.</p>	<p>Current Implementation Process and rankings were removed from the plan. 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 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>In reference to Objective 4.2.2, it is not clear how to minimize the impacts to energy and/or mineral development on GUPDs and WTPDs without an understanding of the development aspects associated with these types of development.</p>	<p>The document includes using an adaptive management approach, and will be updated as we develop a better understanding of impacts and how to manage them. Currently, we are basing our strategy development on our best biological judgment and stakeholder input. 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 a stakeholder implementation process.</p>
<p>In the Conservation Strategy Ranking and Prioritization section, it states that each strategy in the conservation plan was ranked for each of 4 different criteria: (1) feasibility; (2) cost; (3) socio-political importance; and (4) contribution to species and/or ecosystem conservation. It is not clear how and where the figures for (1) feasibility and (2) cost were derived.</p>	<p>Current Implementation Process and rankings were removed from the plan. A new process was developed that 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. Your recommendation will be considered at the appropriate IPA action plan development process.</p>
<p>All issues were retained for energy and mineral development through the ranking and prioritizing of the implementation process, while issues were dropped from almost all other categories. It is not clear why all issues under this category were retained when it appears to be the one with the least amount of scientific research and general knowledge of impacts.</p>	<p>Current Implementation Process and rankings were removed from plan. 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 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 list of strategies is long, and some may say that is helpful in a conservation plan. We feel the lengthy laundry list approach is a hindrance. The strategies need to answer this question to the reader and managers of the Plan “What can be done that will <u>really make a difference</u> for the long term viability of the GUPD?” Presently the plan offers entirely too many strategies and not enough focus.</p>	<p>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 Draft#2 of the CCP. 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.</p>
<p>The GCSA suggests that the highest priority strategy should be:1. The CDOW will foster a working relationship with the landowners and entities directly affected by the GUPD, now and throughout implementation of the Plan. Landowners refers to Federal, State, County and local governments, and private land owners/managers.</p>	<p>We agree that this is an important concept, and forms the basis of all CDOW actions by statute already identified in this plan under Introduction, Management, and Legal Authorities.</p>
<p>We respectfully ask the CDOW to manage the range for a healthy ecosystem, not for individual species. Many of the range strategies discuss specific GUPD needs, and seek grazing management practices to allow GUPD sufficient vegetation. Range management needs to be about healthy ecosystems.</p>	<p>A healthy ecosystem implies that viable wildlife populations are allowed to persist in a constantly changing environment that is driven by natural ecological processes. A healthy ecosystem is the ultimate goal of the DOW. This management plan identifies threats and presents potential strategies for maintaining and conserving prairie dog populations. Properly maintained and regulated livestock grazing on federal lands should allow adequate forage for viable populations of prairie dogs. Federal land management agencies have reduced livestock numbers and intensity of grazing on allotments because they felt this action would promote greater rangeland health. The CDOW fully supports promoting rangeland health, and believes that responsible livestock grazing on federal lands can be compatible with wildlife conservation.</p>
<p>The plan has a strategy to develop a BMP handbook for GUPD, when on page 144 the plan states, “There is a lack of information on the relationship between GUPD and rangeland conditions.” We ask why develop a handbook when we don’t know the answers?</p>	<p>The handbook would be developed when we have a better idea on the management practices we think should be employed. This strategy was developed from the stakeholder workshop.</p>
<p>In addition, the Plan lists 45 strategies in the rangeland section, yet, not one of the issues or strategies discuss the possibility that big game animals in Colorado may have an impact on the GUPD. With over 539,000 deer, 292,000 elk, 73,600 antelope, and 1,200 moose in Colorado, (and some consistently over DAU objectives), the GCSA recommends that an issue be developed concerning this relationship.</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, native grazers and browsers probably do not negatively impact prairie dog populations. In combination with livestock grazing and other environmental variables, wild ungulate populations may contribute to grazing problems in specific locations.</p>

<p>Please note that on page 139 of the Plan, we think that one of the changes that have occurred in Colorado rangelands is the increase of, or addition of wild ungulate populations in areas of the state, not solely the introduction of <u>domestic</u> grazing species.</p>	<p>Overgrazing by livestock has impacted rangeland and has resulted in many changes in vegetation communities and structure. As stocking rates declined, wild ungulates, especially elk, were able to increase due to these declines and vegetation changes. In the document we are concerned about how these changes have impacted prairie dogs due to invasion of non-native plants, lowered water tables, fire frequency, and shrub and PJ encroachment. Grazing levels today do not appear to negatively impact prairie dogs, and we believe browsing and grazing by wild ungulates is not a problem, but there is no literature that evaluates this. In combination with livestock grazing and other environmental variables, wild ungulate populations may contribute to grazing problems in specific locations.</p>
<p>We suggest that reference to conservation easements be re-located to the Urban Development Issues and Strategies section of the Plan and be re-written.</p>	<p>Easement section is being removed because we do not have enough information to adequately address easements and their impacts on prairie dogs.</p>
<p>The CCP has an inherent conflict between this goal and promoting both shooting and poisoning of GUPDs as listed in Issue 6.2 and Issue 10.2 in the Implementation Process section of the plan. We respectfully request that CDOW address and rectify this conflict before the CCP is finalized.</p>	<p>Shooting and poisoning are tools to actively manage prairie dogs. Sometimes control of these species is warranted.</p>
<p>Both flea dusting of prairie dog burrows in smaller areas and a new oral plague vaccine are mentioned in the Section C of the Issues and Conservation Strategies section of the CCP as possible tools for curtailing plague epizootics. Before proceeding with these methods, it is vital that CDOW and other land managers be absolutely certain that neither flea dusting nor an oral vaccine administered by baiting prove detrimental to Gunnison sage-grouse or the insects that they feed on. We do not want to see one species negatively impacted in an attempt to conserve another.</p>	<p>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 in Draft#2 of the document (page 176). 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.</p>
<p>Impacts to private landowners also need to be thoroughly considered before GUPDs are transplanted from target areas to nearby public and private lands. Multiple factors including private landowner conflicts need to be analyzed and evaluated before any re-establishment efforts are considered. Direct consultation with private landowners affected by any proposed transplantation would serve the efforts of CDOW and other CCP implementing agencies.</p>	<p>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 in Draft#2 of the document (page 176). 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.</p>

<p>Gunnison County has stated its support for an incentive plan and an assurance plan for maintenance of prairie dog habitat and for species/ecosystem maintenance. Has CDOW considered a plan like the Candidate Conservation Agreement with Assurances (CCA) program similar to the CCA implemented here in Gunnison County for Gunnison sage-grouse?</p>	<p>CCAs are mentioned in the strategy section of Agricultural Conversions: STRATEGY 1.1.1.2 Create and identify funding sources for implementation, or use available incentives (e.g., easements, fee title, management alternatives, depredation payments, incentive programs, CCAs) for landowners to maintain GUPD and WTPD colonies on private land. STRATEGY 9.4.2.1: Develop an incentive plan (e.g., CCAs for GUPDs) for private landowners and BLM lessees and permittees to maintain GUPD and WTPD habitat. 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 in Draft#2 of the document (page 176). 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.</p>
<p>Again, CCA questions the accuracy of poisoning and the impacts to the prairie dog's population. Actual on-the-ground accounts from ranchers in Gunnison, White-tailed and Black-tailed prairie dogs indicate extensively-prolonged poisoning campaigns to have little effect on decreasing prairie dog populations but rather have significant effects on limiting distribution of prairie dog colonies. This is assuming that a high level of poisoning was initiated</p>	<p>PVA was based on a colony level analysis and did not include animal dispersal. If animals can disperse among colonies, the extinction risk will decline. There are many small colonies that are isolated from other colonies so poisoning at these colonies can be a concern for potential extirpation. The impacts of poisoning and its management in the interest of prairie dog conservation will be examined at the IPA level where relevant.</p>
<p>The statement that "Today prairie dog colonies that inhabit agriculture land occur in small, isolated colonies.." is a statement for which CCA requests additional clarification and supporting documentation. CCA is challenged by this statement as our members have significant acreages that have long-term inhabitations of prairie dogs.</p>	<p>From our data, colonies are small and isolated (see our mapping efforts and occupancy results for GUPD). BFF recovery has been used as a benchmark for measuring the ecological function of the prairie dog system. Currently we have no GUPD colonies/complexes that would be considered as adequate for BFF reintroduction. In the WTPD range we do have Coyote Basin and Wolf Creek, but neither of these sites has yet been successful at maintaining viable populations of BFF. Because much of our data is based on public land surveys, additional information from private lands may show that there is more acreage of prairie dog occupancy than has been documented. Information on prairie dog occupied habitat on private lands would be beneficial to managing and correctly evaluating the species.</p>
<p>CCA is adamantly opposed to the establishment of corridors for Gunnison and White-tailed Prairie Dogs. Control of these corridors and corresponding landowner impacts from the prairie dogs will be impossible. CCA questions the scientific relevance of this proposal as no literature or research has been cited to justify such a practice or its efficacy. Furthermore, such a practice cannot be required on private lands without the consent of the landowner. CCA requests that this conservation strategy be stricken from the Plan.</p>	<p>Current Implementation Process and rankings were removed from plan. 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 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>When considering intensive management areas whereby practices such as reintroduction and land use restrictions, landowners and land users should be considered. If prairie dogs are not to be controlled on public lands, and in fact promoted in areas that border private lands, how will this population be controlled to not spill over onto private lands? There is an obligation by the federal land agency and the DOW to make sure this overflow does not occur. Secondly, reintroduction cannot take place by relocation unless the county commissioners approve such a movement of prairie dogs into their county. Lastly, any land use restrictions should not limit the use of permitted practices, such as grazing, on public lands and assuredly should not take place on private lands.</p>	<p>Current Implementation Process and rankings were removed from plan. 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 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>While CCA acknowledges that the DOW has indicated that Sylvatic Plague is the most critical threat to prairie dogs, we do not believe the document appropriately represents this. While not intentionally overlooked, a greater sense of priority needs to be given to addressing this issue above all else in the Plan. With emerging technologies and practices, control of the plague is likely to have the most dramatic impact on prairie dog mortality.</p>	<p>We feel that the threat due to plague is presented accurately based on available data. Current Implementation Process and rankings were removed from the plan. With a respect for prioritization a new process was developed that 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.</p>
<p>Again, CCA would offer its service to the DOW in connecting with landowners to monitor and survey prairie dog populations.</p>	<p>Thank you for the offer. We hope to work with agricultural and other landusers to implement conservation actions on the ground.</p>
<p>CCA questions the applicability of the literature cited on the Utah Prairie dog in relation to the Gunnison or White-tailed Prairie Dog. The available literature that illustrates impacts to prairie dogs from grazing is limited and offers a high degree of variability. The Cheng and Ritchie study didn't even utilize actual grazing but rather simulated approach, which has called into question the relevancy of the study's results. The CCA views the use of this citation and associated determinations as a stretch and requests that it be deleted due to lack of correlative value.</p>	<p>UTPD is much more similar in behavior and location of habitats to WTPD and GUPD than is the BTPD. Most grazing research has been conducted on BTPDs, which is difficult to extrapolate because of the differences in species behavior and habitats. The UTPD is in the same subgenus and occupies similar habitats, providing the best available research for the species comparisons. Simulation is meant to explore outcomes under a range of key parameters , while recognizing imitations.</p>
<p>Furthermore, the Plan does not speculate on impacts, if any, from other large herbivores such as elk and deer. To this end, CCA requests that livestock grazing be significantly de-emphasized in this Plan.</p>	<p>Wild ungulate herbivory existed within the ranges of the GUPD and WTPD prior to the introduction of livestock. Overgrazing by livestock has impacted the rangeland and has resulted in many changes in vegetational communities and structure. As stocking rates declined, wild ungulates, especially elk, were able to increase due to these declines and vegetational changes. In the document we are concerned about how these changes have impacted prairie dogs due to invasion of non-native plants, lowered water tables, change in fire frequency, and shrub and PJ encroachment. Grazing levels today do not appear to negatively impact prairie dogs, and currently there is no literature available on the impacts to prairie dogs by native ungulates. 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). In combination with livestock grazing and other environmental variables, wild ungulate populations may contribute to grazing problems in specific locations.</p>

<p>CCA requests that we be included in the implementation team.</p>	<p>A new process was developed that 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. No standing, statewide implementation team will be organized with the new Implementation Process but periodic coordination and review at the programmatic level will occur and all stakeholders may participate.</p>
<p>CCA requests that a ranking be added for socio-economics to measure the economic and societal impacts that any proposed practice or regulation might have on any given demographic.</p>	<p>A new process was developed that 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. No standing, statewide implementation team will be organized with the new Implementation Process but periodic coordination and review at the programmatic level will occur and all stakeholders may participate.</p>
<p>We would like to request clarification on Strategy 2.3.1.1. The first sentence states, “Design <u>new</u> power lines and other above-ground facilities to minimize use of structures by avian predators in GUPD and WTPD range.” We would like to confirm that possible future restrictions or mitigation approaches would apply to <u>new</u> facilities and not existing lines and associated rights-of-way (ROWs).</p>	<p>The issue (2.3 and Obj 2.3.1 and strategies 2.3.1.1 and 2.3.1.2) for Utility corridors was removed from the plan. We felt that since predation was not identified as an issue we did not need strategies to address it.</p>
<p>The second sentence states, “Install <u>appropriate perch deterrents</u> where appropriate, in consultation with CDOW.” Parallel to our question above, is this recommendation for use of perch deterrents for <u>new</u> power lines only or for existing power lines, as well?</p>	<p>The issue (2.3 and Obj 2.3.1 and strategies 2.3.1.1 and 2.3.1.2) for Utility corridors was removed from the plan. We felt that since predation was not identified as an issue we did not need strategies to address it.</p>
<p>It is important to note that the use of perch deterrents is complex and these devices should be used for <u>perch management</u> not for total perching exclusion. These devices were designed and developed to move birds away from risk areas on electric poles. The use of perch deterrents or discouragers is somewhat species’ dependent (e.g., some raptor species that may prey on prairie dogs will perch on conductor wires), is not totally effective under all scenarios, can be expensive and result in line operation and maintenance issues, and should be used judiciously and in close communication with the applicable electric utility.</p>	<p>The issue (2.3 and Obj 2.3.1 and strategies 2.3.1.1 and 2.3.1.2) for Utility corridors was removed from the plan. We felt that since predation was not identified as an issue we did not need strategies to address it.</p>
<p>The use and installation of perch deterrents is typically assessed on a <u>case-by-case basis</u> by the utility companies. For example, the application of deterrents will vary among utilities’ construction, operation, and maintenance plans, as will other environmental protection measures that are developed for specific projects, as warranted by federal and state regulatory compliance.</p>	<p>The issue (2.3 and Obj 2.3.1 and strategies 2.3.1.1 and 2.3.1.2) for Utility corridors was removed from the plan. We felt that since predation was identified as a non-issue, we did not need strategies to alleviate this issue.</p>

<p>Therefore, based on this information from the CDOW, issues associated with use of perch deterrents, and regulatory requirements, the use of these devices should be 1) warranted, 2) applied appropriately, 3) used only for perch management, and 4) assessed on a case-by-case basis.</p>	<p>The issue (2.3 and Obj 2.3.1 and strategies 2.3.1.1 and 2.3.1.2) for Utility corridors was removed from the plan. We felt that since predation was identified as a non-issue, we did not need strategies to alleviate this issue.</p>
<p>Suggested rewording "The CDOW and applicable electric utilities would coordinate on the design of new power lines and other new above-ground facilities to minimize use of structures by avian predators in GUPD and WTPD range. The CDOW and electric utilities would coordinate on the possible installation of perch deterrents on new power lines, where and when appropriate. This application would be based on the best available science for perch management, manufacturer information, and specific environmental factors on a case-by-case basis."</p>	<p>The issue (2.3 and Obj 2.3.1 and strategies 2.3.1.1 and 2.3.1.2) for Utility corridors was removed from the plan. We felt that since predation was not identified as an issue we did not need strategies to address it.</p>
<p>We also would like to request clarification on Strategy 2.3.1.2. It states, "<u>Where technically and economically feasible</u>, locate new utility corridors, communication towers, wind turbines, and other above-ground facilities outside occupied GUPD and WTPD habitat." Who would decide what is "technically and economically feasible?" Can this be clarified?</p>	<p>The issue (2.3 and Obj 2.3.1 and strategies 2.3.1.1 and 2.3.1.2) for Utility corridors was removed from the plan. Since predation was not identified as an issue, strategies were not developed to address it.</p>
<p>Also, Colorado utilities are continually expanding their use of communication facilities and moving into renewable energy projects, such as wind energy. Therefore, continued close communications with the Colorado electric utilities on potential future restrictions or mitigation applications will be integral to future planning and operations.</p>	<p>This will be part of the action plan as identified.</p>
<p>Sentence should read "Fragmentation and loss of habitat can disrupt</p>	<p>Fixed as stated</p>
<p>For the GIS analysis you use overall range of the species within each IPA, however on Page 80 you imply that you will use the predicted GUPD and WTPD Range for analyses (which you did not). Obviously, the predicted range will consist of less acreage than the overall range, and it will be more specific to GUPD and WTPD potential habitat. I believe your GIS analyses underestimate the total impact to these two species by issues such as agriculture, housing development, etc because these activities will naturally occur disproportionately within prairie dog habitat because these areas are flatter, have deeper soils, etc. So, when you say that agriculture impacts about 14% of GUPD and WTPD habitat, the true figure will be quite a bit more. I think the GIS analyses would be more meaningful if you overlaid issue spatial data with predicted range rather than overall range.</p>	<p>In the GIS analysis we first depicted the range of the two species using elevation, slope, and vegetation class based on existing vegetation information. (SWreGAp). We then took this predicted range model and asked local biologists to further refine this model by removing areas that were not suitable for GUPD and WTPD occupancy and by adding any additional areas that were not included in the model that were appropriate for occupancy. From this we developed the overall range for the two species. This overall range was used for all of the GIS analysis. We clarified this in the text.</p>
<p>The last two sentences in the first paragraph and the second paragraph in this section say almost exactly the same thing and are repetitive. Also, make sure of spelling of "percent."</p>	<p>Fixed as stated</p>

I don't think shooting would be considered an alternative non-lethal prairie dog control method as indicated in this sentence.	Removed shooting
This section on population monitoring essentially discards all methods except occupancy estimation as unusable or unreliable. However, occupancy estimation is not useful in monitoring population abundance response to various stressors as is called for in strategies for energy development, disease, and others. While it is used in association with ferret reintroduction, the Biggins Method (transecting) is not a robust population estimation technique and should not be used to measure abundance except on a very coarse scale. Recently published papers describe methods of mark-recapture and mark-refight for estimating prairie dog abundance, but these methods are not presented in this section. Perhaps they should be:	We have reworked this section to include other types of site-specific monitoring such as mark-resight, etc. Occupancy modeling is considered the most cost-effective monitoring tool for a range-wide scale; other monitoring approaches for conservation response will be considered where appropriate.
To say that there are isolated populations that experience no genetic interchange outside their occupied areas is speculative at best. You cannot say that with any certainty given the lack of genetic work that has been done to date.	We agree that there is insufficient data on genetic exchange between populations. We are basing our evaluation on dispersal distances recorded for the species, and in some areas there are colonies isolated from other colonies that are beyond the recorded dispersal distance of the species. CDOW is currently conducting studies to investigate migration and to delineate the fundamental unit of management (metapopulation, population, subpopulation).
I could not find the citations for CNHP(2000) and NRCS(2001) in the Literature Cited section.	Corrected as stated
Broom snakeweed is a native species – this section states that it is non-native.	Removed broom snakeweed from the list.
This short, two sentence discussion seems out of place in a section on rangeland condition.	Easement section was removed, as we do not have enough information on individual easements to make this data meaningful.
The Plan proposes to <i>identify areas that could serve as corridors for GUPD and WTPD movement and colony reestablishment to minimize habitat fragmentation due to agricultural operations.</i> We strongly oppose the establishment of corridors when no data has been brought forward to suggest a population's survival is dependent upon such corridors. We specifically request acknowledgement by CDOW that voluntary incentive based actions are the preferred method of gaining landowner support on private, federal, and State lands. In addition we request acknowledgement that conservation actions are voluntary on private lands. - common theme for landowners	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 in Draft#2 of the document (page 176). 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.
The last paragraph under "background" defines how predators rely on prairie dogs as a food source, however, there is no description as to the impacts on prairie dog populations by predators. If the impacts to populations are not known, that should be stated also.	The impacts due to predators are outlined in the "predation" heading following the background section.
The Plan States that <i>WTPD numbers and occupied habitat within the Little Snake Management Area remain severely depressed.</i> The Little Snake Field Office (LSFO) has reported that although the historic prairie dog towns have low population numbers, several populations have been noticed inhabiting once abandoned towns and there is reason to suspect that rather than remaining <i>severely depressed</i> , populations have	We have some mapping data for the Little Snake complex from 2006 that indicate fewer acres occupied than mapped in the late 1990's, but it is clear that some of the earlier mapping included areas apparently unsuitable for WTPD based on soils and slope. In general, though, the population status of WTPD within the LSFO remains largely uncertain. We have removed the wording "severely depressed".

<p>The Background section reveals the time lag between the time the author wrote this section and the current economy. It highlights a <i>dramatic increase in oil and gas development over the past 6 years</i> and lists the Applications for Permits to Drill (APD)'s as more than tripling. These statements held true, until late 2007, then began drastic declines throughout all of 2008 and are predicted into 2009. For instance, Moffat County, a western Colorado stronghold for White-tailed Prairie Dogs, ranged between 125-145 APD's per year until 2008 where the State issued 42 APD's for Moffat County. Not only did APD numbers drastically reduce, but the price of natural gas decreased from around \$15/mcf to less than \$3/mcf along with decreased drilling and exploration initiatives around many prairie dog colonies. We request these drastic declines in energy be reflected in the Plan for 2008 and projected into 2009, rather than portraying the plan as having to operate in the midst of increasing energy development.</p>	<p>Oil and gas development has declined since 2008 as the reviewer indicates. The section describing oil and gas development in the NW IPA (p.125) is modified to read, "Recently, oil and gas development activity has increased dramatically in the NW IPA. Both the White River and Little Snake BLM Field Offices (in the NW IPA) experienced growth in oil and gas development over the past several years. However, the pace of oil and gas development slowed in portions of Moffat County in 2008 and slowed considerably across the range beginning in the late fall as a result of the economic recession. Oil and gas development is expected to accelerate with improving economic conditions, though perhaps not to the level experienced through 2007. The 20-year forecast for oil and gas development in the NW IPA calls for significant growth. Oil and gas development of federal mineral estate in the BLM Little Snake Field Office is projected to reach 3,031 wells drilled in the 20 years from 2007 to 2027. Drilling activity in the Little Snake planning area resulted in 594 wells drilled over the previous 20-year period (BLM 2007). Drilling activity on federal mineral estate in the BLM White River Field Office is currently projected to reach 17,000-20,000 wells drilled within the next 20 years. The previous 20-year estimate of drilling activity in the White River planning area projected that 1100 oil and gas wells would be drilled between 1997 and 2017 (Bureau of Land Management 2006b). However, the vast majority of the wells anticipated in the White River Field Office will occur outside WTPD habitat."</p>
<p>The Plan reports <i>stipulations need to be developed and implemented in the short-term in Land Use Plan revisions to protect these species and their habitats</i> . We request the word <i>stipulations</i> be removed, and replaced with "<i>management issues</i>"</p>	<p>We do not implement management issues but actions . Replaced stipulations with management actions.</p>
<p>We make the same request as above to acknowledge that energy development is not occurring at a rapid pace, and that the last year of economic and regulatory changes nationwide as well as in Colorado, have placed energy in a declining occurrence and, at best, the industry increases and decreases as market conditions change. Acknowledging the fluctuations in the industry and the 2009 projected decline is preferable to misrepresenting oil and gas as ever-increasing.</p>	<p>Oil and gas development has declined since 2008 as the reviewer indicates. The section describing oil and gas development in the NW IPA (p.125) is modified to read, "Recently, oil and gas development activity has increased dramatically in the NW IPA. Both the White River and Little Snake BLM Field Offices (in the NW IPA) experienced unprecedented growth in oil and gas development over the past several years. The pace of oil and gas development slowed in portions of Moffat County in 2008 and slowed considerably across the range beginning in the late fall as a result of the economic recession, however. Oil and gas development is expected to accelerate with improving economic conditions, though perhaps not to the level experienced through 2007. The 20-year forecast for oil and gas development in the NW IPA calls for significant growth. Oil and gas development of federal mineral estate in the BLM Little Snake Field Office is projected to reach 3,031 wells drilled in the 20 years from 2007 to 2027. Drilling activity in the Little Snake planning area resulted in 594 wells drilled over the previous 20-year period (BLM 2007). Drilling activity on federal mineral estate in the BLM White River Field Office is currently projected to reach 17,000-20,000 wells drilled within the next 20 years. The previous 20-year estimate of drilling activity in the White River planning area projected that 1100 oil and gas wells would be drilled between 1997 and 2017 (Bureau of Land Management 2006b). However, the vast majority of the wells anticipated in the White River Field Office will occur outside WTPD habitat."</p>

<p>We are deeply concerned about the issue of connectivity between colonies and the Plan suggesting that special management areas are needed where corridors will be used to connect prairie dog colonies. We request removal of this issue unless a thorough scientific biological justification for prairie dog corridors is described.</p>	<p>The revised 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. 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 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 heading of Table 19 identifies “social, economic, or political causes” drive each issue. However, little social and no economical drivers have been identified in this Plan. We request these drivers as well as social and economical impacts be addressed in more detail than a cursory mention on page 7.</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 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>Tables 19-21 certainly demonstrate that disease is the highest ‘severity’ ranking and ‘scope’ ranking, however, disease accompanies all other issues that are low in ranking compared to disease. We request these tables be modified to separate disease in a class of its own, rather than portrayed as an issue on the same playing field as all the other issues.</p>	<p>Table 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 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>Table 21 is extremely misleading as it ranks all regions as having “High” rankings for disease, yet in the NW region, Energy and Minerals, Population Monitoring, and Range Condition are also ranked as “High”. The average reader will misinterpret this to mean that these other issues need to be addressed with the same priority as disease, when this is false. In fact, two pages earlier, at the bottom of page 162, agricultural conversion and range condition were ranked as a very low priority. Again, we request this table be modified to separate disease in a class of its own, rather than mixing it in with other issues to give a false appearance of equality between range condition (and other issues) and disease.</p>	<p>Table 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 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>Add an Objective to Recognize the Benefits of Ag lands and create strategies to retain lands in Ag production Strategy 1.2.1.2 any corridors must be voluntary incentive based even on Federal land or you will create Ag land conversion to houses! If this plan does not recognize that it’s adverse recommendations' can create ag land conversion then it’s disingenuous and culpable.</p>	<p>See strategy 1.1.1.2: Create and identify funding sources for implementation, or use available incentives (e.g., easements, fee title, management alternatives, depredation payments, incentive programs, CCAAs) for landowners to maintain GUPD and WTPD colonies on private land. The benefits of agricultural land use, need for connectivity, and opportunities for conservation actions will be discussed at the IPA prioritization process.</p>
<p>If predation is not an issue why this section?</p>	<p>It was added because predation is mentioned as a potential threat to populations in the multi-state assessments, in the petitions to list the species and in addressing the USFWS 5 listing factors we need to evaluate predation.</p>

<p>Though the effects of GUPDs and WTPDs on ecological processes and biological diversity may be more muted than those reported for BTPDs, their role in maintaining the integrity of the system is no less important” Prove it! Where are your facts or strike it!</p>	<p>See page 15 and 16 in the document for what we know about how GUPD and WTPD alter their environments: BTPDs, the most widely-studied prairie dog species, are known to significantly alter their habitats. The limited amount of research conducted on GUPDs and WTPDs shows that their impact on the environment is less dramatic than that of BTPDs. For example, 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. However, Bangert and Slobodchikoff (2000) 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. The magnitude of difference between the impact of BTPDs and that of the GUPD and WTPD may be due to the vegetative communities they inhabit, as well as to the relatively limited above-ground activity of GUPDs and WTPDs (they can live 5 months underground), lack of “clipping” behavior, lower densities, and fewer social interactions.</p>
<p>Reorder priority Place Issue 3.2 and 3.3 Objective 3.2.1 as the # priority for funding research and Implementation</p>	<p>Strategies are not in priority order. Priorities will be set at the local level through the Implementation Process (page 176).</p>
<p>Genetics Object to “postulation” throw them out Support research</p>	<p>CDOW is conducting a genetics study to evaluate genetic variation within portions of the GUPD range, evaluate the presence of metapopulation structure and examine potential existence of two GUPD subspecies using both microsatellite and mitochondrial DNA analyses.</p>
<p>Recent impacts are over stated as poisoning is not occurring on federal lands in the NW IPA and PVA results are flawed because recolonization was not part of the model The lack of factual representation discredits “by in” by major stakeholders.</p>	<p>In the document we state that poisoning is occurring on private lands. PVA is a management decision support tool. The PVA is not intended to provide accurate “answers” for what the future will bring for a given wildlife species or population. 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. Thus because we know that recolonization is not part of this model, poisoning impacts on a complex of colonies is potentially overstated. But isolated colonies exist within the range of the species. Again it is only a tool.</p>
<p>Amend 8.1.1.1.3 to mitigate impacts to grazing Permittees Necessary if you want buy in and Civic Environmentalism Remember adverse impacts to permits causes conversion of private habitat</p>	<p>Added " permittees" to the list. 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 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>First paragraph is overly critical and unnecessary! Strike all but the last sentence. I would refer you to appendix B and the range wide conservation plan which only encourages habitat manipulation not a return to presettlement conditions or the implication which this draft seems to be rife with.</p>	<p>Healthy landscapes should be the ultimate goal of all natural resource managers and agencies. Species-specific management should only be implemented when specific threats have been identified and strategies exist to bolster species of concern population viability. We are not advocating presettlement condition, but a focus on rangeland health. Removed reference to presettlement.</p>
<p>Omits that livestock Numbers have decreased more than 50% range wide in the west. believe the numbers for Colorado are the similar.</p>	<p>Added additional sentences: The numbers of sheep and cattle on western rangelands peaked in the early 1900s, with livestock grazing centered on season-long use and stocking rates routinely exceeding carrying capacity of habitats (Cottam and Stewart 1940 <i>in</i> Collier and Spillett 1975, Young and Sparks 1985 <i>in</i> Crawford et al. in press). Within the recent past, stocking rates have been reduced by more than 25% (USDI-BLM 1990) and concurrent with these reductions, public rangelands have seen improvements (Box 1990, Laycock et al. 1996 <i>in</i> Crawford et al. in press).</p>
<p>Fails to mention misguided agency policies (Smokey bear) and 60plus years of agency fire suppression including CDOW.</p>	<p>We discuss changes in fire frequency in the plan.</p>
<p>Fails to reference new research that prairie dogs (BTPD) adversely affect grazing Question, have you characterized Cheng & Ritchie 2006 accurately? High biomass reduces visibility and palatability Common sense Fails to acknowledge the conversion of private Ag lands to urbanization if Grazing Permittee economic sustainability is not considered when making recommendations or regulations by state or federal agencies 2nd paragraph, Ah hell folks just admit the last sentence is true and Take the MAY out of it you might make some friends</p>	<p>Research on the impacts of grazing on BTPDs is difficult to extrapolate to the WTPD and GUPD range. The behavior of the BTPD differs from the WTPD and GUPD; WTPD and GUPD do not clip vegetation and live in more arid habitats with winter/spring grazing. A new implementation process has been developed in Draft#2 of the document 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.</p>
<p>The title and the description of easements seem unrelated what was the author's intent? Why is there no mention of the other tools listed in table 16? Table 16 makes no mention of how the table may change with the various implementations of the strategies</p>	<p>The easement section was removed, as we do not have enough information on individual easements to make this data meaningful.</p>
<p>Misses most all of the stakeholders points above it Incorrectly assumes that restoration to presettlement is necessary Focuses on reducing grazing Fails to acknowledge that rangeland degradation form fire suppression and the need to restore rangeland to a lower successional state which will benefit WTPD</p>	<p>We removed the reference to presettlement condition. New paragraph: There is a lack of information on the impacts of rangeland changes on prairie dogs; additional research is needed. Currently, many land-use agencies have improved and continue to improve rangeland conditions by reducing intensity and altering the duration or timing of grazing, controlling invasive weed infestations, and seeding areas to promote grass, forb, and sagebrush growth. Through these efforts, GUPD and WTPD habitat will likely be improved.</p>

<p>Strategies seek to pedestal PD over grazing Permittees This is unacceptable and fails to recognize other ungulates (Besides livestock) and PD's create impact on the habitat as well</p>	<p>Healthy landscapes should be the ultimate goal of all natural resource managers and agencies. Species-specific management should only be implemented when specific threats have been identified and strategies exist to bolster species of concern population viability. A new Implementation Process has been developed in Draft#2 of the document. 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.</p>
<p>Again strategies seek to pedestal PD over other users and create mandates for federal lands None of these were agreed to in the Stake holders meeting</p>	<p>Strategies are simply listed as provided 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 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>Strong object to the Ranking of range condition and Ag conversion and or the implication that this is a serious issue to WTPD IT IS NOT The charts are very misleading and confusing</p>	<p>Strategy rankings have been removed from the document. Rankings of issues and prioritization of strategies will be completed within each IPA with stakeholders. These rankings will be included as an addendum to the plan and will be used for the development of a 3-5 year action plan.</p>
<p>The conclusions regarding the affects of agriculture on the species does not acknowledge that the creation of some croplands (particularly grass hay meadows and alfalfa fields) may actually benefit prairie dogs, though it is acknowledged elsewhere in this section. Because statements are often taken out of context by others, Gunnison County recommends including a discussion of creation of croplands benefiting prairie dogs be included in the conclusion section of the Issues and Strategies: Agricultural Conversion section.</p>	<p>Creation of alfalfa fields for prairie dogs does not seem like a reasonable conservation action. While croplands can result in high densities of prairie dogs, they can also create wildlife-agriculture conflict. We are advocating protecting native landscapes for prairie dogs in which they can perform their ecological function.</p>
<p>Considering the prairie dog colony mapping difficulties noted in the Plan, Gunnison County questions how the DOW was able to accurately map 3,178 acres of active colonies in South Park. Gunnison County believes that this mapping effort and all the other referenced in the Plan are, at best, estimates with little reproducible accuracy. Because these types of figures are often used by other agencies, and in particular by proponents of listing species under the Federal ESA, Gunnison County believes CDOW should be extremely careful in noting the limitations of data presented in this Plan.</p>	<p>Limitations are noted in the plan. The number of occupied acreage for each IPA is an estimate, as the polygons on the map have not been ground-truthed and are updated only once every four years.</p>
<p>There appears to be uncertainty regarding separation of species, much less delving into subspecies and their management needs. Gunnison County recommends removing discussion of subspecies and associated issues from the Plan.</p>	<p>We agree there is uncertainty. CDOW is currently collecting data to help shed light on this uncertainty. The subspecies question becomes very relevant when considering management strategies such as translocation. Thus, though there is uncertainty, this issue still needs to be considered in management of the species.</p>

<p>Gunnison County strongly supports genetic studies that will help elucidate and support or refute the USFWS designation of “montane” and “prairie” populations of GUPD. Gunnison County recommends that this strategy be given the highest priority within the Genetics Conservation Strategies because of the potential impacts of this designation in any ESA listing decision made by the USFWS or in any judicial decisions.</p>	<p>CDOW intends to continue genetic studies as resources, prioritize and new information allow. As part of the new Implementation Process, stakeholders can rank issues and strategies to develop their 3-5 year action plans.</p>
<p>Some of the poisoning and other management alternatives noted directly conflict with Gunnison Sage-grouse conservation strategies (such as the use of raptor perches). These conflicts should be identified and resolved before this Plan is finalized.</p>	<p>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 in Draft#2 of the document (page 176). 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.</p>
<p>Occupancy sampling is obviously the author’s preference, but insufficient detail is provided to allow an evaluation of the protocol. Gunnison County recommends that a transparent peer review process of the sampling protocol be conducted prior to incorporation into the Plan as the preferred method of population trend estimation.</p>	<p>Occupancy sampling is an accepted technique for monitoring populations in a cost effective way. It has been peer reviewed and is published in the Journal of Wildlife Management (see Andelt et al. 2009 in Literature Cited). Other monitoring tools and their application for response to conservation actions can be considered during the IPA planning process.</p>
<p>The discussion of population re-establishment does not take into consideration the impacts of movement of transplanted prairie dogs from target areas to nearby private lands. It appears that the author assumes that if the re-establishment effort takes place on public lands, then all is well and good. Gunnison County recommends development of a matrix to evaluate areas to be considered for re-establishment efforts that takes all factors, including impacts to private lands, into consideration.</p>	<p>This type of detail can be addressed in local IPA implementation plans. A new Implementation Process has been developed (page 175). 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.</p>
<p>Population Re-establishment. Strategy 8.1.1.3 does mention working with public land agencies, stakeholders, and local governments to gain support and approval for reestablishment sites. Because of the issues and controversy associated with transplanting prairie dogs, Gunnison County recommends a more comprehensive and <u>required</u> public process – beyond “working with...”)</p>	<p>This type of detail can be addressed in local IPA implementation plans. 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 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>Consider changing the heading of “I.” from Rangeland Condition to Rangeland Health to correlate with how Rangelands are evaluated under the CCAA process for Sage-grouse, using TR 1734-6 Interpreting Indicators of Rangeland Health. Though crested wheat grass is an introduced species that has altered rangelands, Gunnison County does not agree that it is an “invasive weed”. Broom snakeweed is a native plant that is an increaser as rangeland ecosystem change, and could be direct result of prairie dogs. In the interest of clarity and uniformity Gunnison County believes there should be an additional paragraph topic under Rangeland Condition that addresses “introduced species.” TR 1734-6 addresses this in the evaluation of the 17 indicators of rangeland health.</p>	<p>We use Rangeland Condition to describe how changes in plant species composition and structure may impact prairie dog populations. Some of these changes have been caused by human-induced alterations such as livestock grazing, application of herbicides to thin sagebrush stands, and alteration of natural fire regimes. More natural alterations include drought, wildfire, and the spread of invasive weeds. All of these changes impact rangeland composition and vegetation structure, and influence prairie dog population dynamics (i.e., nutritional planes, litter size, survival). We avoided using Pellant et al's TR 1734-6 Interpreting Indicators of Rangeland Health because it is a specific evaluation of 17 different indicators of the system's functionality in relation to soil characteristics. Rangeland Health is a specific qualitative assessment of site potential based on soil characteristics. It is not a more generic term (Rangeland Condition) which we preferred for this section in order to address the many extrinsic factors that influence vegetation composition and structure. Pellant et al. defines range condition as the present status of vegetation of a range site in relation to the climax (natural potential) plant community for that site. It is an expression of the relative degree to which the kinds, proportions, and amounts of plants in a plant community resemble that of the climax plant community for the site (SRM 1999). Rangeland health is the degree to which the integrity of the soil, vegetation, water, and air, as well as the ecological processes of the rangeland ecosystem, are balanced and sustained. Integrity is defined as maintenance of the structure and functional attributes characteristic of a locale, including normal variability (SRM 1999). Society for Range Management. 1999. A glossary of terms used in range management. Society for Range Management. Denver, Colorado. 20p.</p>
<p>Livestock Grazing: Cattle vary their diet as well, utilizing desirable forbs when available. Their diet is predominately grass because that is the majority of the forage available. Grazing impacts on grass reduces competition by grass species, allowing forbs to better compete.</p>	<p>Thank you for your comment.</p>
<p>GIS – The discussion of easements does not fit with this section.</p>	<p>The easement section was removed, as we do not have enough information on individual easements to make this data meaningful.</p>
<p>Gunnison County is not sure who reached the “conclusion” on this page; stakeholders at the workshop, or the author. The statement that “...many land use agencies are working to improve rangeland conditions by reducing intensity and timing of grazing...” and the following conclusion that “Through these efforts prairie dog habitat will likely be improved” is not supported by the previous discussion and referenced research on livestock grazing/prairie dog interactions. Out of context this “conclusion” provides opportunity for misuse of this document. Gunnison County recommends using the word managing intensity and timing of grazing instead of reducing. Restoring rangelands is not hard, it is matching it to the needs of a species in a manner that they will use it. Succession usually has to be reset and allowed to move forward, and species usually do best during some point in that successional sequence.</p>	<p>New paragraph: Healthy landscapes should be the ultimate goal of all natural resource managers and agencies. Species-specific management should only be implemented when specific threats have been identified and strategies exist to bolster Species of Concern population viability.</p> <p>There is a lack of information on the impacts of rangeland changes on prairie dogs; additional research is needed. Currently, many land-use agencies have improved and continue to improve rangeland conditions by managing intensity and duration or timing of grazing, working to control invasive weed infestations, and seeding areas to promote grass, forb, and sagebrush growth. Through these efforts, GUPD and WTPD habitat will likely be improved.</p>

Issue 9.4: Strategy 9.4.1.2. Gunnison County supports developing a list of best management practices (BMP's) to help meet the habitat needs of prairie dogs based upon VALID research.	Added "based upon peer reviewed research results and adaptive management strategies".
Issue 9.4. Strategies 9.4.2.1-.3. Gunnison County supports an incentive plan and an assurance plan for maintenance of prairie dog habitat and for species/ecosystem maintenance. In short, the carrot works better than the stick.	Agreed.
Issue 9.7 Address drought impacts. Strategy 9.7.1.2. "Encourage land managers to reduce herbivory during times of drought..." needs to be reconsidered and the language refined/amended. Use of this strategy by land managers simply to get the livestock off of public land range is a possible consequence of this statement.	Removed strategy 9.7.1.2. since it was a repeat of 9.7.1.1. 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 in Draft#2 of the document (page 176). 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.
Issue 9.7. Strategy 9.7.1.3. Grass banks are one option but often, because of logistics or other issues, cannot be taken advantage of by livestock producers. Other similar strategies such as a drought fund to offset feed costs should be explored and included in this issue.	A drought fund was included in the issue.
In the GIS Analysis Results, low urban development is defined as being >80 units/acre and high development is defined as <40 units/acre. The definitions appear to be reversed which makes us wonder if the GIS analysis is not in error as well.	Thank you for noticing the error. The GIS analysis was done correctly. Labeling was incorrect and has been fixed.
The issue ranking process concerns Gunnison County. Gunnison County is not aware of a formal process that involved all stakeholders, such as Gunnison County or its residents, in a ranking process. Because of the possible use/misuse of this section, at minimum Gunnison County asks that the participants in the ranking process be identified.	A new Implementation Process has been developed in Draft#2 of the CCP. 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.
There are two sets of pages 161-164, which need to be renumbered.	Numbering has been redone
The last sentence on p84 and continuing on p85 is an incomplete sentence. Its content should be clarified. Were the words "disrupt" and "can" intended to be switched?	Changed as stated

<p>We believe the statement that agriculture “is significant only on the local scale, not a statewide scale” is not accurate. While the total impact of agriculture on the overall viability of the 2 species in Colorado cannot be definitively determined as this point, we believe it is premature to make a statement that agriculture is not impacting (directly, indirectly, and/or cumulatively) their overall viability (as discussed on p 87). Considering that impacts resulting from habitat fragmentation and poisoning are having impacts, in combination with other threats such as urban development and plague, future management of prairie dog habitats on a landscape level must consider the impacts (positive and negative)of agriculture on the long-term viability of prairie dog habitats.</p>	<p>This statement was removed.</p>
<p>In section 2.1.1.1, insert “landscape scale” in between “on” and “conservation”. More emphasis should be placed on maintaining large scale management units, where the ecosystem has a better chance of maintaining itself – realizing other human perturbations will also likely be occurring in the units, within each of the IPAs.</p>	<p>Changed as stated</p>
<p>We strongly support the objective and strategies discussed in Issue 2.2. Utilization of such an ecosystem approach will benefit many species and could be a positive proactive step towards precluding the need for such species to be petitioned for or actually become listed species. Monitoring should be conducted in an adaptive management approach as outlined in Williams et. al (2007).</p>	<p>Details of monitoring will be developed during development of the 3-5 year action plan.</p>
<p>Information presented in the Plague section should be updated with information presented at the November 2008 Plague Symposium held at Fort Collins, CO. We would be willing to assist in that effort.</p>	<p>Section was updated.</p>
<p>Delete the word “be” in the first line of the first full paragraph</p>	<p>Changed as stated</p>
<p>In Strategies 3.3.1.7, 3.3.1.8, 3.3.1.9 and 3.3.1.10 insert “or other appropriate flea control methodologies” after dusting since other methodologies may prove to be more effective and cost efficient as time proceeds. Wherever “dusting” is used or referred throughout the CCP, a similar search and replace effort should be implemented (assuming it is appropriate in all cases).</p>	<p>Changed as stated</p>
<p>Add Strategy 3.3.1.11 – Utilize the Plague Contingency Plan being compiled by the BFF Conservation Committee that is currently in draft form to assist in the management of plague within GuPD and WTPD habitats.</p>	<p>Added strategy</p>
<p>Change “persent” to “percent” in last sentence of first paragraph under “Background”.</p>	<p>Changed as stated</p>
<p>First paragraph on page. Leases have already been issued for oil shale RD&D on four 160acre parcels of BLM lands. The Final EIS/Record of Decision for oil shale development was issued in November 2008.</p>	<p>This following text has been added to the end of this paragraph on page 119, "Five RD&D leases were issued by BLM in the Piceance Basin. Each of these 160 acre tracts, along with preference lease rights resulting from successful development of the RD&D tracts, are located outside occupied WTPD range."</p>

Pipelines associated with energy development also impact PD habitat in a manner similar as that outlined for well development and placement. These effects should also be discussed in this section.	Added a statement about pipelines in the direct impacts to prairie dogs.
. The energy and mineral development section does a good job of discussing the energy development that is under Federal purview. However, a discussion on the amount of energy development occurring on other lands (non-Federal purview) is needed in this section so that conservation strategies already identified can be implemented	Data on leasing and development of state and private minerals has been difficult to acquire. We would be glad to include additional information if the commentor can provide data that we lack. Localized assessments of drilling pace will be used in the development of IPA implementation plans. A new paragraph is inserted on page 126 that reads, "Much of the preceding description addresses oil and gas development on federal mineral estate. Leasing and development of state and private minerals is occurring at what appears to be an equivalent pace, but data for these lease and development rates is more difficult to acquire. The Colorado Oil and Gas Conservation Commission information presented in Figure 21 on page 118 includes all well permits approved in Colorado. Federal permits make up 35-40% of the total number of well permits issued "
The FWS strongly supports the position of the CDOW on opposition of the use of toxicants on any prairie dog species	Thank you for your comment
The FWS strongly supports the monitoring discussed in Issue 7.1. We believe enhanced management capabilities could be achieved through intensive monitoring of more than 1 GUPD site and the BFF WTPD sites given the broad portions of Colorado that are covered by these 2 species. We realize budget and personnel availability issues need to be considered in developing overall strategies for monitoring the numerous species the CDOW manages, but a combined effort with other agencies/entities should be pursued so that intensive monitoring can be conducted at more than 1 site.	Thank you for your comment. Discussion of monitoring more than one site will occur during the Implementation Process. Monitoring should go hand in hand with plague control or surveillance efforts.
The concluding paragraph should discuss the need to manage rangeland with the idea of the uncertainty that lies ahead relative to the influence of climate change. While there are a lot of uncertainties about how climate change will affect certain habitats, an overall management strategy that maintains a larger landscape and thereby increases the ability of given species the opportunity to adjust their range as changes occur should be included. Add Issue 9.9: Design IPAs and other management units such that they are large enough to maintain species ability to respond to habitat changes that may result from climate change.	Added statement to concluding paragraph: Management of rangelands needs to consider the potential influence of climate change. While there are uncertainties about how climate change will affect certain habitats, an overall management strategy that maintains a larger landscape, and thereby increases the ability of species to adjust their ranges, should be incorporated in the overall conservation of these two species. Management emphasis areas are a strategy and can be selected for management during the Implementation Process. We feel this was adequately addressed in other issues, and details of the development of an MEA can be done at the IPA level.
add: "as long as seasonal closures are maintained" at the end of the first sentence.	Added to sentence
In Strategy 10.2.1.2, insert "significant declines and/or" between "causing" and "extirpati	Changed as stated
Objective 10.2.2, add "when supported by sustainable prairie dog population" to the end of the statement.	Changed as stated
Strategy 10.2.2.1 add "when supported by data and management objectives" to the end of the statement.	Changed as stated
Strategy 10.2.2.2. Please explain what the economic analysis will be done on (prairie dog in general, a control technique, etc?).	Detail will be developed in local action plans. This strategy was developed at a stakeholder workshop and we have no further detail.

<p>Strategy 10.2.2.3 add “to assist in achieving population management objectives, as well as other site specific objectives such as control” to the end of the sentence.</p>	<p>Changed as stated</p>
<p>Strategy 10.3.2.4 Please clarify as to what information sources will be used and improve that available information.</p>	<p>The PVA is the only currently available information source. This strategy was developed during the workshop, and detail will need to be developed in the Action Plan if this strategy is selected for implementation.</p>
<p>Add the following statement: “Indirect effects of urbanization also result from poisoning or other control efforts deemed appropriate for human health issues, as well as predation resulting from domestic pets, in prairie dog population areas adjacent to urbanization.” to the first paragraph in this section.</p>	<p>Changed as stated</p>
<p>add “initially” in second sentence between “were” and “higher” since it seems from the description in this paragraph that the populations declined in the long-term.</p>	<p>Changed as stated</p>
<p>We believe more emphasis should be placed on the direct and indirect effects of Urbanization on prairie dog populations. While the potential impacts of urbanization vary within the IPAs due to the variances in the amount of land subject to urbanization as demonstrated (23% in Gunnison IPA to 67% in the LaPlata/Archuleta IPA), the direct, indirect and cumulative impacts of growth inducing activities (urbanization, associated roads, power lines, pipelines, etc) have more potential to have substantial impacts than implied.</p>	<p>We used the information available to develop this section. If you have additional information we can use please provide it and we can use as appropriate.</p>
<p>Specifically, here in La Plata County for over a decade, the total permits issued by the Colorado Oil and Gas Conservation Commission are about 4% of the State’s total. For Archuleta County, it is even smaller with less than one half of 1%. In 2007, the State did have a total of 6,368 APDs, but La Plata County had only 251 of those permits; and in 2008, the State’s total was 8,027 with La Plata County having 328 of those permits. For Archuleta County, they had 47 permits in 2008 and only 26 permits in 2007. Regarding rising energy prices, according to the Colorado Oil and Gas Conservation Commission the current price of the San Juan Basin index is \$3.11/mcf compared to \$6.92/mcf in 2005, \$5.88/mcf in 2006 and \$5.92/mcf in 2007. In 2008 the average equaled \$7.21/mcf; however looking at the October 2008 through February 2009 average it is \$3.93/mcf. Gas Prices fluctuate, and while we agree that they are a factor in drilling activity, it should not be a reason to rush a conservation plan without good data regarding the consistent pace of energy and mineral development in southwestern Colorado.</p>	<p>In developing the plan we used current oil and gas information. The pace of energy development is recognized as constantly changing and unpredictable. Our focus is on the impacts of this threat to the two prairie dog species, recognizing that energy development is and will take place within the overall range of these two species. Site specific analysis will need to be completed to adequately address issues and implement adequate strategies. This plan cannot address the fluctuating pace of the oil and gas industry. All of these actions are identified as potential management strategies, and will be implemented as appropriate in specific circumstances through the Implementation Process.</p>

<p>Spacing in La Plata County and Archuleta County also differ, depending on the formation. For coalbed methane (cbm), in some parts of the counties you can have 8 cbm wells, in other parts only 4 cbm wells in a section of land (640 acres). A well pad is generally about 1 acre not 2 acres in these counties, and this conservation plan does not address the fact that here pad sharing or pad twinning is occurring with most if not all of any 80 acre infill applications. As a matter of fact, in the State of Colorado the number of oil and gas well permits for wells drilled from a common well pad was 5,007 out of 8,027 permits in 2008 and in 2007 3,649 from a common well pad out of 6,368 permits. By utilizing directional drilling, operators have less impact on the surface, and utilize the same roads and need no additional pipelines. There is no seismic exploration occurring in La Plata County or Archuleta County.</p>	<p>Site specific analysis will need to be completed to adequately address issues and implement adequate strategies. This plan cannot address the fluctuating pace of the oil and gas industry. All of these actions are identified as potential management strategies, and will be implemented as appropriate in specific circumstances through the Implementation Process.</p>
<p>Also, here in La Plata County and Archuleta County there has been no dramatic increase in oil and gas development on federal lands, even with the Record of Decision on lands contained in the Northern San Juan Basin Coal Bed Methane Project Final Environmental Impact Statement, in July of 2006. As of September, 2008, there were only 28 pending APD with the San Juan Forest Service in La Plata County and 0 pending APD in the Pagosa Forest Service. Waiting for research is warranted in these two counties before implementing any conservation strategies</p>	<p>Thank you for the information on weed management. When and if weed management becomes the focus of an IPA, it can be addresses with appropriate strategies from the plan.</p>
<p>Weed plans are required here in La Plata County, as well as a yearly effort sponsored by the La Plata County Energy Council with a Weed Symposium, full day event. Approximately 150 people attend these learning sessions with topics ranging from Key Weed Identification and proper control, the effect of disturbance on weed populations along roadsides, rights of way and easement, and even effects of herbicides on grassland establishments. Speakers are local or from the New Mexico and Colorado State Universities.</p>	<p>Site specific analysis will need to be completed to adequately address issues and implement adequate strategies. This plan cannot address the fluctuating pace of the oil and gas industry. All of these actions are identified as potential management strategies, and will be implemented as appropriate in specific circumstances through the Implementation Process.</p>
<p>Land Use –With 3,068 active wells in La Plata County as of February 6, 2009 compared to 37,586 active wells in the state, La Plata County has 8% of the total wells, and less than one third of one percent of the land in this county has a gas well on it. Natural gas development has coexisted here for over 55 years and Energy Council members firmly believe energy can be produced safely and responsibly with the highest regard for our residents, wildlife, livestock and the environment.</p>	<p>Site specific analysis will need to be completed to adequately address issues and implement adequate strategies. This plan cannot address the fluctuating pace of the oil and gas industry. All of these actions are identified as potential management strategies, and will be implemented as appropriate in specific circumstances through the Implementation Process.</p>

<p>The Energy Council agrees that the data related to oil and gas impacts on prairie dogs and their ecosystems are insufficient to make robust management decisions. Drilling is not occurring at a pace here in La Plata County or Archuleta where it will be difficult to wait for research results. We suggest a basin approach or area approach, a better strategy is to get sufficient data before developing a regulatory mechanism that may impose a substantial burden and significant economic cost for operators or transporters here in southwestern Colorado. Thank you for your consideration.</p>	<p>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 in Draft#2 of the document (page 176). 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.</p>
<p><u>Add the following word to Objective 1.1.1:</u> Minimize the <u>perceived</u> negative effects of prairie dogs on agricultural lands. Comment: The existing objective assumes that the presence of prairie dogs has a negative effect on agricultural lands. Because the stated “ISSUE” is that the “[t]he co-existence of prairie dogs and agriculture presents challenges . . .” the corresponding objective should mirror and resolve this issue.</p>	<p>Added wording</p>
<p><u>Add the following phrase to Objective 1.1.1.1:</u> Provide landowners in GUPD and WTPD range with educational materials on alternatives to poisoning to protect croplands from prairie dog damage, <u>together with the incentive plans set forth in Objective 1.1.1.2 below.</u></p>	<p>Added an additional Strategy: STRATEGY 1.1.1.1: Develop alternatives to poisoning to protect croplands from prairie dog damage.</p>
<p>Objective 1.1.1.2: Create and implement, or use available incentives . . . for landowners to maintain GUPD and WTPD colonies on private land. Comment: In order to have meaningful protection and conservation, the State and CDOW must develop and implement feasible alternatives to poisoning and destruction of prairie dogs within a defined time frame, not to exceed one year from adoption of the Plan.</p>	<p>Currently CDOW is unaware of any feasible alternatives for protecting landowners from prairie dog damage. This is not a recovery plan and we are not attempting to protect every prairie dog on the landscape. We recognize that poisoning needs to be used in certain circumstances as a management tool. CDOW advocates the development and use of non-lethal methods, yet we do not have those methods available at this time. Poisoning and extermination of prairie dogs is not condoned or promoted. Local control of distribution and abundance by landowners is acknowledged as necessary.</p>
<p><u>In ISSUE 10.2, delete the sentence:</u> “However, there are “socio-economic benefits to shooting prairie dogs that may conflict with prairie dog management.” Comment: There are certainly no benefits, “socio-economic” or otherwise, to the prairie dog itself, to being shot. It is a statement of opinion that there exist “socio-economic” benefits to humans when they shoot prairie dogs. I and others dispute that there any benefits accrue to humans when they shoot animals, and request that the existing final sentence be deleted from the formal objective.</p>	<p>This issue and corresponding strategies were developed at the stakeholders workshop. The strategies developed at this workshop included a wide array of stakeholder interests. We agreed to maintain the strategies developed from this process within this strategy as potential options for prairie dog management and conservation.</p>
<p><u>Delete Objective 10.2.1.</u> Comment: It should not be the duty nor the objective of CDOW, the State regulatory agency, to “provide” for recreational opportunities for shooting prairie dogs. This objective does not advance the stated objectives of a conservation and protection plan goal. The objective also implies that CDOW oversees or condones “recreational shooting” of prairie dogs on state-owned land.</p>	<p>Our definition of conservation includes active management. Reworded ISSUE 10.2: Recreational shooting may have detrimental impacts on GUPD and WTPD population dynamics, as well as on associated species. There are, however, socio-economic benefits to humans and their communities that result from shooting prairie dogs; these may conflict with specific management objectives.</p>

<p><u>Delete Objective 10.2.2</u> Comment: Please see the comment directly above. It should not be the State government’s objective to “preserve and enhance prairie dog recreational shooting opportunities . . .” This is an offensive statement and is at odds with the stated purpose of a protection and conservation mandate. The statements and objectives also imply that such “shooting opportunities” may be endorsed and protected on State or Federal land.</p>	<p>Our definition of conservation includes active management. Recreational shooting of prairie dogs is consistent with the CDOW mission as defined by legislative declaration in Title 33. We acknowledge that such activities may conflict with conservation needs and priorities and expect the issue to be addressed at the IPA level as appropriate.</p>
<p><u>In Objective 11.11.1, delete the following phrase: “ in existing developments (for parcels between 10-40 acres)”</u>. Comment: To only conserve and minimize habitat loss and fragmentation with “existing developments” excludes protection and conservation as applied to future development – surely not the meaning nor intent of the Plan. Additionally, there should exist a meaningful minimum and/or maximum land parcel size for protection of prairie dogs. To limit protections for land parcels between 10 and 40 acres is an arbitrary designation and leaves smaller (and larger) parcels completely unprotected. In urban and suburban areas, prairie dogs commonly inhabit parcels less than 10 acres because that is all the land that is left; often they are sandwiched between developments. Also, housing and commercial developments usually take up much more land than 40 acres. Allowing protections for land parcels only between 10 and 40 acres eviscerates the protections in urban and suburban areas for prairie dogs. As a further point, it is worth protecting and conserving prairie dogs within “pockets” of urban and suburban development, even for small land parcel sizes. Scientific research has shown that preserving these “pockets” of prairie dog populations preserves genetic diversity which otherwise would be missing.</p>	<p>Please see Objective 11.1.2 which addresses future development. Removed reference of 10-40 acres.</p>
<p><u>Delete the word “future” from Objective 11.1.1.2:</u> Within existing GUPD and WTPD range minimize habitat loss and fragmentation from sub/urban development [deleting the word “future”]. Comment: The use of the word “future” in the sentence gives no concrete deadline as to when the minimization of habitat loss and fragmentation will occur. In order to be an effective protection of prairie dogs, the protections must begin immediately, or within a defined time frame, not to exceed one year from adoption of the Plan.</p>	<p>No change needed - this objective is planning for future development and Objective 11.1.1. is for existing development.</p>

<p><u>Substitute the following for Objective 11.5.1:</u> Identify existing land use development requirements in Colorado counties and compile a list of all rules and regulations directly impacting prairie dogs (e.g., wildlife assessment requirements). Request that local governments adopt and/or amend such rules and regulations to include provisions (a) requiring an assessment (to CDOW) of the presence of prairie dogs prior to development; and (c) requiring a CDOW report will include recommendations consistent with this Plan as regards the protection and conservation of prairie dogs prior to any development. Comment: Some Colorado counties do require that a wildlife assessment be completed (either by CDOW or another entity) prior to site development, including grading. Assessments should be required throughout the state, as well as a meaningful CDOW response which protects and conserves the prairie dogs.</p>	<p>CDOW does submit landuse comments. 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 in Draft#2 of the document (page 176). 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.</p>
<p><u>Amend Objective 6.2.1 to read as follows:</u> Provide better education and recommendations to agriculturalists and land developers on the proper use of poisons for use in controlling GUPDs and WTPDs, <u>which</u> recommendations to include relocation prairie dogs in lieu of poisoning them. Comment: The group of objectives surrounding Issue 6.2 appear to be in contradiction to the purpose of the Plan. Poisoning and extermination of the prairie dogs should not be promoted or condoned by CDOW; rather, the implementation of relocation and other alternatives (co-existence?) should be explored and promoted by the Agency.</p>	<p>Please see strategy 6.3.1.3, which includes development of non-lethal methods. 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 in Draft#2 of the document (page 176). 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.</p>
<p>After this plan was written there has been a significant decline in oil and gas development in prairie dog habitat. Energy development as stated in this plan is not occurring at an unprecedented rate in Colorado. There is a contradiction in this paragraph, in one sentence it states that WTPD are being more heavily impacted by oil and gas development and in the next sentence it states; however the impacts are not known from these activities because studies have not been conducted. The statement should be removed from the plan that WTPD are heavily impacted from oil and gas development and replaced with more studies on a collaborative effort with the industry need to be conducted to have the best available science to understand the coexistence of WTPD with oil and gas development and the other issues. I attending the November 10 Moffat County Land Use Board Meeting where Brad Petch and Pam Schnurr gave their presentation on the plan and we all came to a general agreement that this plan was not to provide stipulations rather management practices. We also considered the Little Snake Resource Draft EIS and agreed that the two stipulations which are in the new plan are adequate for the protection of the WTPD.</p>	<p>In developing the plan we used current oil and gas information for 2007. The pace of energy development is recognized as a constantly changing issue and this area of text has been substantially changed to reflect the past year's contraction in drilling activity. Our focus in this section is to identify potential impacts of this threat to the two prairie dog species recognizing that energy development is and will take place within the overall range of these two species. Site specific analysis will need to be completed to adequately address issues and implement adequate strategies. The need for additional research to determine the nature and severity of oil and gas impacts on prairie dogs is identified in the opening paragraph of the discussion of possible impacts (p. 123) as well as in the strategies, specifically issue 4.1 (p. 130). All of these actions are identified as potential management strategies. The need to implement any strategy will be identified as appropriate in specific local circumstances through the revised Implementation Process (Local Action Plans).</p>

<p>I do agree with the statement that adaptive management will need to be employed in this plan, and would suggest it be placed in a more significant part of the plan, maybe in the initial statements.</p>	<p>This was added to the introduction.</p>
<p>Since the new rules and regulations placed by the COGCC, energy development is not occurring at the rate we have had in years past. It is not accurate at this time to state that energy development is occurring at a rapid pace and there are such fluctuations and an immediate decline, that statement should be removed from the document. These strategies call for immediate decisions and actions. These objectives take on significant work and cost to accomplish the strategies and they cannot be accomplished immediately. This statement needs to be removed and the objectives and strategies need to be modified.</p>	<p>In developing the plan we used current oil and gas information for 2007. The pace of energy development is recognized as a constantly changing issue and this area of text has been substantially changed to reflect the past year's contraction in drilling activity. Our focus in this section is to identify potential impacts of this threat to the two prairie dog species recognizing that energy development is and will take place within the overall range of these two species. Site specific analysis will need to be completed to adequately address issues and implement adequate strategies. The need for additional research to determine the nature and severity of oil and gas impacts on prairie dogs is identified in the opening paragraph of the discussion of possible impacts (p. 123) as well as in the strategies, specifically issue 4.1 (p. 130). All of these actions are identified as potential management strategies. The need to implement any strategy will be identified as appropriate in specific local circumstances through the revised Implementation Process (Local Action Plans).</p>
<p>Strategy 4.2.1.2:Map occupied GUPD and WTPD habitat We do not have a base population, we cannot monitor the population and who is going to be responsible for the mapping of the habitat and to what radius</p>	<p>Details of monitoring can be developed during development of the IPA implementation plans. All of these actions are identified as potential management strategies, and will be implemented as appropriate in specific circumstances through the Implementation Process.</p>
<p>Strategy 4.2.1.2: Monitor GUPD and WTPD distribution and occupancy at sites prior to, during and after energy and/or mineral development question again who is responsible for this. Referring to page 134 the, population monitoring, in the conclusion it states that the research current results from occupancy sampling are promising for evaluating the status of both GUPDs and WTPDs. This plan goes on to say that this samplings will allow managers to detect reasonable declines that can provide triggers to initiate management action, taking into account the natural biological variation of the species. This has not been tested in the field and we are asking for immediate action to monitor populations of sites. 4.2.1.2 Should be removed or a pilot project can be tested.</p>	<p>Strategy 4.2.1.2 was developed by stakeholders at the Stakeholders Workshop. However, the wording in Strategy 4.2.1.2 has been changed from "Monitor" to "Evaluate" to avoid confusion as to the intent. The intent of this strategy is solely to document the presence and activity level of prairie dogs in areas experiencing oil and gas development before and after the development occurs. It is not intended to be used for assessing population status as described in the Population Monitoring section. Details of necessary evaluation criteria and priority can be developed during development of the local IPA implementation plans. All of these actions are identified as potential management strategies, and will be implemented as determined to be appropriate in specific circumstances through the Implementation Process.</p>
<p>Strategy 4.2.2.2: Remove the word Require: I would remove the entire strategy because in strategy 4.2.2.1, you already have use BMPs, and adaptive management is monitoring, you do not have to require it.</p>	<p>Removed the word "require" and inserted the word "Complete" . The two strategies encompass two different ideas; Strategy 4.2.2.1. is to develop BMPs and 4.2.2.2. is to ensure compliance.</p>
<p>I am very concerned about developing high quality special management areas for prairie dogs and the issue of connectivity between colonies. This entire section should be deleted. We should not develop large complexes as special management areas as it relates to oil and gas development or rangeland management for prairie dogs. It is stated in this document these prairie dogs are impossible to count, and they colonize. Due to these facts alone, it would also be impossible develop connected corridors for the prairie dogs and special management areas.</p>	<p>These Strategies were developed during stakeholder workshops. 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 in Draft#2 of the document (page 176). 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.</p>