

Comments	How comment dealt with
<p>As a gut reaction, many members of the Moffat County Land Use Board suggested that the strategies to handle disease be ranked between 13-15, while strategies to deal with all the other issues be ranked between 1-4. Although we understand rankings are not as simple as we just portrayed in the above sentence, we wish to make the point that separation of disease vs. all the other issues is critical, and currently insufficiently portrayed in Appendix F. We request Appendix F more adequately address this concern.</p>	<p>Appendix F was 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 (current ranking were removed) and strategies to be implemented in a 3-5 year action plan. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has consensus from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs. Responsible parties will be identified during this meeting.</p>
<p>Moffat County has concerns over the PVA model due to the lack of accuracy of imputed data. The WTPD PVA model has more variability than the Sage Grouse model, which was called into question and controversial. The WTPD PVA model cannot accurately predict WTPD population curves due to significant variability in model inputs such as plague severity, colony size (no accurate counts exist), and the fact that it is based on a Utah subspecies of prairie dog. It is not known if or how the Utah subspecies relates to the Colorado subspecies of prairie dog. We acknowledge that there is little data regarding the WTPD to run a PVA model with, but we suggest using this data, rather than data from a separate subspecies, such as has been done. When the best available data is not accurate enough to model, the model should not be run. Considering there may not be enough data to run a PVA model on WTPD, we highly recommend deferring running this model until such time the data is available for the correct subspecies. This is not a proposal to permanently abandon the model, but rather a gesture to offer our assistance in providing good data so quality outputs of the PVA</p>	<p>To develop the PVA model, we researched relevant literature and held a 2-day workshop with experts in the field of prairie dog biology and plague to determine inputs appropriate for the model. The PVA is a tool for investigating current and future risk of GUPD and WTPD population decline or extinction, it does not dictate decisions. The need for and consequences of alternative management strategies were modeled to suggest which practices may be the most effective in managing prairie dog populations. Baseline models were used to study the interaction of a number of prairie dog life history and population parameters, to explore which demographic parameters may be the most sensitive to alternative management practices, and to test the effects of selected management scenarios. Because we know that plague is present throughout the system, we used an enzootic base model and incorporated epizootic plague in our risk analysis.</p>
<p><b>Appendix B – Rangewide Conservation Strategy and Plan – Objectives and Prioritized Issues</b></p>	
<p>Gunnison County would like more information on the scientific basis for developing and prioritizing the “Priority issues and associated conservation activities.”</p>	<p>A new Implementation Process has been developed on in Draft#2 of the document (page 176). This process will be a stakeholder process to rank issues (current ranking will be removed) and strategies to be implemented in a 3-5 year action plan. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has consensus from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs. Responsible parties will be identified during this meeting</p>
<p><b>Appendix E – Protocol for Conducting Prairie Dog Occupancy Surveys</b></p>	

<p>Has this protocol been peer reviewed? If so, what were the comments?</p>	<p>Occupancy monitoring is an accepted technique for estimating patterns and trends in the distributions of animals. See: Mackenzie et al 2005 (Occupancy Estimation and Modeling: Inferring Patterns and Dynamics of Species Occurrence. Academic Press. 344p) for an introduction to this methodology <a href="http://www.directtextbook.com/prices.php?q=0120887665&amp;dtkts=ssp_0120887665&amp;classes=ssp">http://www.directtextbook.com/prices.php?q=0120887665&amp;dtkts=ssp_0120887665&amp;classes=ssp</a>) This protocol used in Colorado on the GUPD and WTPD surveys we conducted was published in the Journal of Wildlife Management (see Andelt et al 2009 in Literature Cited Section of the Plan)</p>
<p>Gunnison County is again, concerned about the lack of private landowner involvement. Population estimates without private lands information will not be correct.</p>	<p>Occupancy sampling surveys are conducted on both private and public lands.</p>
<p>Gunnison County does not feel comfortable with the statements made regarding landowner liability. Gunnison County recommends a more thorough review of landowner liability with regards to observers.</p>	<p>Appendix E is a report produced for the CDOW by Dr. Bill Andelt of Colorado State University and, as such, was not meant to include a legal analysis of liability issues. Only those occupancy plots that had approval by the landowner to visit were surveyed. The CDOW does maintain workers compensation in case an injury incurred during surveys.</p>
<p><b>Appendix F – Conservation Strategy Prioritization and Selection for Implementation</b></p>	
<p>Overall, Gunnison County does not believe that the conservation strategy development, prioritization or selection for implementation has been given adequate public process by the CDOW. Very few Gunnison County residents were aware that the only workshop that has occurred for GUPD’s even occurred. Further, few workshop attendees realized that that single event was the only public input that would be allowed during development of this Plan. Gunnison County believes that participation by affected stakeholders, particularly landowners has not been adequately addressed and must occur before this section is finalized.</p>	<p>A new Implementation Process has been developed on in Draft#2 of the document (page 176). This process will be a stakeholder process to rank issues (current ranking will be removed) and strategies to be implemented in a 3-5 year action plan. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has consensus from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs. Responsible parties will be identified during this meeting.</p>
<p>The “wish list” of conservation strategies for rangeland condition is long and will be virtually impossible to achieve, if anything because of cost. Gunnison County is particularly concerned about rangeland condition BMP’s for GUPD’s because of their potential impact on County residents and in particular our ranching industry. These BMP’s must not be developed in an agency vacuum, as most of this Plan has been.</p>	<p>The document incorporates a series of strategies that may or may not be implemented to conserve these species. A new Implementation Process has been developed on in Draft#2 of the document (page 176). This process will be a stakeholder process to rank issues (current ranking will be removed) and strategies to be implemented in a 3-5 year action plan. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has consensus from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs. Responsible parties will be identified during this meeting.</p>
<p>Rangeland condition has the most strategies though the Plan does not rate it as the highest threat to the species.</p>	<p>The number of strategies identified for each issue is not meant to be an indicator of the importance of that strategy for conservation of the prairie dog species. The number of strategies are the result of a stakeholders workshop. Some groups developed more strategies than others and CDOW kept all of the strategies developed by the stakeholders to include in this document.</p>

<p>Strategy 11.1.1.1. The mapping of “apparent” movement corridors is likely to be much easier than the mapping of “real” movement corridors. Again, Gunnison County is concerned about how much science will be put into mapping corridors and how those corridors will then impact Gunnison County constituents.</p>	<p>The document incorporates a series of strategies that may or may not be implemented to conserve these species. Any implementation of corridor mapping will be discussed at the action plan meeting at each IPA. Only the best science available will be used to design and implement corridors.</p>
<p>Strategy 11.1.2.4. Why is working with local governments to amend local plans considered as having “LOW” feasibility? Gunnison County believes local governments are very amenable to consideration of species of concern in their local planning processes.</p>	<p>Appendix F was 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 (current ranking were removed) and strategies to be implemented in a 3-5 year action plan. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has consensus from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs. Responsible parties will be identified during this meeting.</p>
<p>Strategy 11.1.3.3. Identifying sending and receiving areas appears to us to be greatly over-simplified in cost and feasibility.</p>	<p>A new Implementation Process has been developed on in Draft#2 of the document (page 176). This process will be a stakeholder process to rank issues (current ranking will be removed) and strategies to be implemented in a 3-5 year action plan. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has consensus from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs. Responsible parties will be identified during this meeting</p>
<p>Strategies 11.5.1.2 and 1.3. Why is providing information materials, maps etc. and working with land-use planners and other entities considered to have low feasibility?</p>	<p>A new Implementation Process has been developed on in Draft#2 of the document (page 176). This process will be a stakeholder process to rank issues (current ranking will be removed) and strategies to be implemented in a 3-5 year action plan. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has consensus from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs. Responsible parties will be identified during this meeting</p>
<p><b>Appendix G – Population Viability Analysis Report</b></p>	
<p>Who are the members of the “Gunnison’s and White-tailed Prairie Dog Conservation Plan Steering Committee”? If the membership has not been identified, please let Gunnison County know whom you are considering for membership. Gunnison County would like to have a seat on the Steering Committee.</p>	<p>No committee will be formed. We will rely on the stakeholder process to develop a local action plan. If we find that there is a need for a committee you will be invited to participate.</p>
<p>This report unequivocally states that historic overgrazing by livestock (which is listed above poisoning, land conversion, urban development, and shooting) has caused “apparent declines” in GUPD and WTPD populations. Gunnison County is concerned about this conclusion and interested in how the CDOW reached this apparent prioritized assumption.</p>	<p>The table of prioritization was removed. Ranking of Issues will be completed at the IPA level with the public since the local communities have a clearer understanding of the issues in their area. The ranking will be based on scope and severity of an issue.</p>

<p>The conclusions of this report include the statement that "...prairie dog populations, if free from natural and anthropogenic stressors, can show strong demographic dynamics. This greatly reduces the risk of extinction for even the smallest populations on the landscape." Gunnison County understands that the USFWS likely had not seen this report before its 12 month finding, but this statement appears contrary to statements the USEFWS made in that finding.</p>	<p>The PVA was presented to the USFWS. The document does show that prairie dog populations have low to no extinction rate potential if free from anthropogenic disturbances or plague. However, if we overlay these issues onto the base model, since plague free populations do not exist and many populations are impacted by shooting, and poisoning, the risk analysis showed that these robust populations can go extinct when the above risk factors are included in the model.</p>
<p><b>Appendix H – Results of Aerial Surveys for GUPD’s and WTPD’s</b></p>	
<p>Gunnison County is very concerned about the statement in this report that "...this methodology might be sufficient for consideration of listing prairie dogs as threatened or endangered." The methodology referred to, interviews with biologists with random verification, is noted as inherently inaccurate for a number of reasons. Gunnison County understands that this report was written in 2003 and does not necessarily reflect the CDOW’s current position on population estimates, but at minimum, Gunnison County believes discussion of this statement within the Plan itself must occur to avoid confusion and misrepresentation.</p>	<p>If mapping is the best available data then the USFWS will use it in their listing decision. When data were presented to the USFWS from the CDOW, we added discussions about the limitations of mapping data.</p>