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Received
County Adminstration
8/7/2012

August 6, 2012

Gunnison Basin Sage Grouse Strategic Committee
Attention-Chairman Ken Stahlnecker
200 E. Virginia Avenue
Gunnison, CO 81230

RE: Predator control inquiry

Dear Chairman Stahlnecker,

Thank you for your letter regarding a proposal to conduct a predator control project in the Gunnison Basin and your recommendation to review the Gunnison Sage-Grouse Rangewide Conservation Plan (RCP) to keep the science current. Colorado Parks and Wildlife (CPW) appreciates your continued interest in conservation actions that may benefit Gunnison sage-grouse (GuSG). As you point out in your letter, predator control is a very sensitive issue. In the RCP, criteria were developed (through a public process), including thresholds, to evaluate the need for conservation actions such as predator control and we still believe these criteria are based on the best available science. Sage-grouse populations can vary widely over time. CPW had spent considerable time reviewing data, literature, research and options before recommending the Miramonte predator control project. The Wildlife Commission then approved the project at Miramonte as a management action with specific objectives, monitoring and other criteria and for a limited time (two years). In addition, a considerable amount of public outreach was conducted to inform the public of the proposal to conduct a predator control project and established the 2-year time frame for the experiment to be conducted within.

Our data from grouse studies and monitoring in the Gunnison Basin do not support predator control in the Gunnison Basin under the guidelines of the RCP. The criteria that would need to be considered before implementing a predator control program for the Gunnison Basin population are the same as those that were used for Miramonte. The Wildlife Commission Mammal Predator Management Policy and the RCP guidelines require evidence for the need for predator control; there is no documented evidence of increased predation on the Gunnison Basin population. Lek counts have doubled between 2004 (498 males) and 2006 (1061 males) and have remained around 750 males (50% increase) over the last 5 years. Absent other scientific evidence to the contrary, that trend can anecdotally be interpreted as though predation is not a significant

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limiting factor to recruitment of young of the year in GuSG. Therefore, we still consider long-term habitat conservation that is intended to minimize fragmentation, to be the highest priority conservation action for GuSG in the Gunnison Basin.

Although the Gunnison Basin GuSG population seems to have been reasonably robust in recent years, all of the small populations outside of the Gunnison Basin currently meet the RCP recommended guidelines for considering predator control as a conservation measure. Given the highly vulnerable long-term viability of these populations, we conclude they should be given high priority for conservation efforts (including predator control).

Miramonte was selected for the predator control project because of timely data from on-going research which showed that predators, primarily coyotes, were suppressing the limited population in that area. Further, Miramonte is a small geographic area (only about 12,000 acres). Past coyote control efforts demonstrate that coyote numbers are most effectively reduced when control efforts are implemented across relatively small areas. Thus, Miramonte was an ideal location for implementing predator control given biological data implicating coyotes and the likelihood for successfully reducing coyote numbers. Predator control efforts were only recently completed and data have not been fully analyzed. Preliminary indications are that nest success and chick survival have not increased significantly in response to two years of predator control efforts.

In addition to the lack of biological data in support of predator control, we have additional financial, legal, programmatic and social concerns about a Gunnison Basin-wide predator control experiment. Costs associated with large scale predator control are very significant and could easily run $100,000 - $500,000 annually. Such a project would require contracting and coordinating predator control with the U. S. Department of Agriculture (Wildlife Services). Additional funding would be needed to conduct surveys and other demographic studies necessary to meet the criteria in the RCP to approve a predator control project as well as subsequent monitoring costs to determine the effectiveness of such control. Funding for predator control would likely have to be diverted from other conservation actions as our resources are not unlimited. We want to make sure that we are focusing first and foremost on those conservation actions that address the primary threats identified by the U.S. Fish and Wildlife Service (USFWS) in its warranted but precluded finding (or any future listing proposals).

The USFWS would also need to be involved in predator control involving corvids, such as those mentioned in your letter, including ravens, crows and magpies. These avian species fall under the Migratory Bird Treaty Act and are under the authority of the USFWS, and any take of corvids would require a federal permit, likely issued to a local or

state agency. Additionally, the Miramonte project indicated a need to also take raptors which was not allowed by the Wildlife Commission action which approved the project. The take of raptors (which are federally protected), while possibly necessary, could create a significant amount of public dissatisfaction with the action and the predator project over-all.

Initiating a predator control project at this time is also complicated by the possible change in legal status of GuSG, as the Endangered Species listing decision is only a few months away. If GuSG is found to warrant listing as either a federally threatened or endangered species, authority for their management will likely transfer from Colorado to the USFWS.

Because a listing decision is imminent (no later than September 2012), CPW is reluctant to undertake a review of the Gunnison Sage-Grouse Rangewide Conservation Plan this year. If GuSG are listed, we expect that the USFWS will create a recovery outline over the 18 months that follow, and subsequently develop a recovery plan. If this scenario unfolds, we feel that the most appropriate time to update the science that was used to develop the RCP is during the development of a recovery plan. The USFWS has solicited updates to all science as well as ongoing conservation activities relating to GuSG since the RCP was approved in 2005, through their Candidate Review process. Through this process, CPW has contributed annual updates on monitoring, research, habitat improvement and conservation. We are happy to provide you with copies of these documents upon request.

Gunnison sage-grouse continue to be a high profile species and will become more so with the listing decision deadline approaching. CPW appreciates all the efforts of the Gunnison Basin Sage-Grouse Strategic Committee, and we will continue to work with you for the benefit of the grouse and their habitat.

Sincerely,

Tom Spezze
SW Region Manager

cc: Rick Cables, Jeff Ver Steeg, Craig McLaughlin, Chad Bishop, J Wenum, Kathy Griffin, Francie Pusateri