

extinction is exacerbated by a short lifespan.

Grassland Conversion Issues

Comment 28: Grassland conversion has destroyed mountain plover habitat and resulted in a decline in mountain plovers.

Response 28: We are unable to precisely quantify the amount of mountain plover habitat that has been lost due to agricultural conversions and, therefore, are unable to precisely quantify the impact to mountain plovers. We do not believe the present or future conversion of grasslands is an imminent threat to all mountain plover breeding locations, throughout the species' range.

Comment 29: The Service overstated the loss of grasslands as an impact on breeding mountain plovers, because the rangeland loss reported in the 2002 proposed rule is minuscule relative to total rangeland available. This means that the impact to mountain plover habitat is even smaller and, therefore, of no consequence.

Response 29: We agree that most grassland conversion occurred prior to 1982, and that the proportion of rangeland lost to total rangeland from 1992 to 1997 is small. We have revised the section of the final determination addressing grassland conversion.

Comment 30: The Service inappropriately analyzed the National Resource Inventory database in its description of rangeland conversion loss, and the implications to mountain plover habitat.

Response 30: Because we are unable to precisely differentiate mountain plover habitat from among the NRI cover types, the NRI data are of little value in clearly and concisely assessing the degree of threat to mountain plovers or their habitat. We have revised the section of the final determination.

Comment 31: Some commenter stated that the presence of thousands of acres of Conservation Reserve Program (CRP) lands represents a threat to mountain plover habitat. Other commenter complained that the Service has not given credit to the thousands of acres of grassland created by the CRP.

Response 31: The CRP administered by the Department of Agriculture allows producers to retire lands for 10-year periods to remove highly erodible soils from production, thereby benefitting wildlife and other resources. As of 1992, 2,002,000 ha (4,946,000 ac) of land were enrolled in the program in Colorado, Montana, and Wyoming, and most of these lands were planted to grass (Berlinger and Knapp 1991, Lesica 1995). The wildlife that benefit most

from these practices (such as ring-necked pheasant, northern bobwhite, and western meadowlarks) are those associated with tall vegetation (Schenck and Williamson 1991), although within each State, the Department of Agriculture has the ability to plant a variety of grass species, including short grasses that benefit mountain plover.

Comment 32: Wintering habitat is becoming a limiting factor. The historic conversion of grassland in California impacted mountain plovers, and future modifications of crop types, agricultural practices, or urbanization will have additional impact.

Response 32: Mountain plovers demonstrate some flexibility on winter habitat. Wunder and Knopf (2003) reported that agricultural practices on croplands in the Imperial Valley are critical to wintering mountain plovers, although Knopf and Rupert (1995) concluded that grasslands were preferred by wintering mountain plovers to agricultural fields in the Central Valley. While not all of the croplands are suitable foraging habitat, and modification of practices on croplands used for foraging could be detrimental to some mountain plovers, we do not believe the rate of conversion occurring now is having a significant influence on the total abundance of mountain plovers throughout California.

Livestock Grazing, Range Management, and Farming Issues

Comment 33: Range management is a factor in the historic decline of mountain plovers, and represents a current threat to existing mountain plover populations. Grazing practices now are very similar to those that were adopted decades ago.

Response 33: The prevailing grazing management standards adopted by Federal agencies and grazing associations tend to maximize forage production and diminish excessive disturbance to grass and soil. Such practices can be detrimental to mountain plovers, although we have no information to indicate this is happening on a broad scale across the species' range.

Comment 34: The Service incorrectly stated that the Forest Service has no schedule for revising grazing management prescriptions on the Pawnee National Grassland.

Response 34: This final determination has been corrected to report our recent coordination with the Forest Service regarding their planned revisions to range allotment management plans on the Pawnee National Grassland, which are designed in part to enhance mountain plover breeding habitat.

Comment 35: Since farming practices have not changed in 50 years how can there be any impact to mountain plovers?

Response 35: We recognize there are numerous small farming and ranching operations that have retained historic practices that may benefit mountain plovers. As a result of a variety of factors, including more advanced technology and more effective agricultural chemicals, the average farm size has increased. As the farms have gotten larger, it is no longer feasible to till and plant a field within a short period of time. Consequently the lands are tilled in early spring when suitable habitat for mountain plover nesting is present. Therefore, some nests are at risk from spring tilling if measures are not taken to avoid nests. This final determination describes the implications of current farming practices to mountain plover conservation.

Issues Related to Prairie Dogs

Comment 36: We received numerous comments on the Service's discussion of mountain plovers and prairie dogs, the abundance and distribution of prairie dogs, and the role of prairie dogs in the historic and current status of the mountain plover.

Response 36: This final determination cites published literature, expert opinion, and other sources of available information to describe the association of mountain plovers and prairie dogs. Of the many comments received addressing prairie dogs, only one provided detailed information to challenge our discussion regarding the distribution of mountain plovers on prairie dog colonies in Montana. Recently, research completed in southern Phillips County, Montana, affirmed a strong association of mountain plovers with prairie dogs (Dinsmore 2001). Therefore, based on our review of the information available, we continue to believe breeding mountain plovers are strongly associated with prairie dogs in Montana. We have revised the section on prairie dogs to report new information.

Comment 37: The Service grossly underestimated the abundance of prairie dogs and, therefore, grossly underestimated the abundance of mountain plovers.

Response 37: The Wyoming Department of Agriculture is correct that the current estimate of black-tailed prairie dogs in Wyoming is greater than earlier Service estimates. However, it does not follow that the mountain plover population is proportionately underestimated. As stated above, we base our total mountain plover