

## MEMORANDUM

TO: Open Space Board of Trustees

FROM: Dan Burke, Director, Open Space and Mountain Parks  
John Potter, Resource and Stewardship Manager  
Andy Pelster, Agriculture and Water Stewardship Supervisor  
Heather Swanson, Ecological Stewardship Supervisor  
Victoria Poulton, Prairie Dog Conservation and Management Coordinator

DATE: January 13, 2021

SUBJECT: Written Information: Annual Prairie Dog Management Update

---

### **Background**

At their Aug. 11, 2020 meeting, City Council approved the Open Space Board of Trustees (OSBT) and staff recommended preferred alternative for prairie dog management and soil health on irrigated agricultural land in the northern portion of the Open Space and Mountain Parks (OSMP) land system to complete 140-240 acres of prairie dog removal annually with barrier construction and soil health restoration activities. This direction added to the suite of prairie dog conservation efforts already undertaken by the department from past guidance including the Grassland Plan and the recommendations of the Prairie Dog Working Group. OSMP staff held a virtual public meeting on Dec. 14, 2020 to provide updates to the community on implementation of the prairie dog working group, restoration of soil health and agricultural sustainability, and to describe initial plans for management in 2021. Prior to the virtual meeting, presentations on each of these topics were released for public viewing. At the meeting, OSMP staff gave abbreviated presentations and answered questions that had been submitted by the community both before and during the meeting. OSMP continued collecting comments from the community on 2021 management of prairie dogs until December 20. All items related to the meeting, and questions received and answered can be viewed at <https://bouldercolorado.gov/osmp/prairie-dog-management-and-conservation>.

### **2020 Accomplishments**

Prairie dog management and Agricultural (Ag) land restoration accomplishments in 2020 included filling the Prairie Dog Conservation and Management Coordinator OSMP staff position; obtaining sylvatic plague vaccine from the United States Department of Agriculture (USDA) at no cost; distribution of two rounds of plague vaccine in the Southern Grasslands; donation from the Humane Society of the US of expertise, labor, and materials in support of some prairie dog relocations; barrier construction at relocation sites and the receiving site; restoration work on 2019 relocation sites; soil sampling to determine baseline conditions; providing educational programs; supporting research into prairie dog contraception; and interacting with agencies, researchers, tenants, and the public to communicate about prairie dog management. OSMP staff also completed annual prairie dog colony mapping that has taken place since 1996. More details are available in the recorded presentations about prairie

dog management and population monitoring, prairie dog removal, agricultural land restoration and the soil health program referenced above.

### **2021 Implementation Plans**

Staff evaluated transition and removal areas within the project area in the northern portions of the OSMP system to determine the highest priority for management in 2021. The criteria to establish priority as presented in the preferred alternative supported by OSBT and approved by City Council are:

1. Areas designated as removal and transition areas.
2. Areas where the likelihood of effective removal, exclusion, and restoration are most likely to be successful.
3. Areas leased by tenants that are most affected by prairie dog occupation.
4. Areas that are currently unleased but can be restored to production.
5. Areas where successful management will increase OSMP lease revenue.
6. Areas where removal will have least impact to associated species.
7. Areas with the highest degree of neighbor conflict.
8. Areas that provide some degree of relief to the greatest number of tenants.

Plans for 2021 Implementation presented to the community in December 2020 included the following:

- Continued implementation of priority Prairie Dog Working Group recommendations - see presentation at website above for more details
- Relocation of approximately 43 acres of prairie dogs from the Nu-West South and Gallagher properties to a receiving site in the Southern Grasslands (TBD with state)
- Lethal control of approximately 100 acres of prairie dogs from the Hester, Cowles, Axelson-Coot Lake, Lousberg, and Ditzel properties
- Installation of barriers where necessary to prevent recolonization of properties following removal
- Restoration of agricultural properties after removal to encourage enhanced agricultural sustainability and soil health
- Collection of baseline soil information prior to and after removal of prairie dogs to study the changes associated with prairie dog removal and restoration

Prior to the Dec. 14, 2020 public meeting, staff received approximately 99 questions on these plans. During and after the meeting, additional questions were submitted by the community. A subset of questions were answered verbally during the meeting, but all questions received a written response- that document can be viewed at <https://bouldercolorado.gov/osmp/prairie-dog-management-and-conservation>

In addition to comments, staff collected feedback and suggestions for 2021 implementation of prairie dog management through Dec. 20, 2020. Thirty-four comments were received by the deadline, and an additional two comments were received after the deadline. A summary of feedback is provided below, and a full list of comments is available on the website referenced above.

General Comments:

- Change the ratio of levels of relocation to lethal control
- Use only lethal control
- Do not use any lethal control
- Prioritize ecological preservation and/or prairie dogs over agriculture
- City Council did not listen to the public's desire to avoid lethal control
- Slow down implementation of lethal control
- Focus removals on only highest conflict areas
- Offers of financial or volunteer support for relocation
- Investigate further coexistence strategies
- Support suggestions submitted to City Council as part of the expedited review process by Keep Boulder Wild
- Staff is mis-representing the relationship between prairie dogs and soil health to make false statements about negative impacts of prairie dogs
- Staff is understating the negative impacts of agriculture on soil health, habitat loss and climate change
- Highly visible lethal removals create emotional distress to community members, including and especially children
- Staff is undermining efforts to conserve prairie dogs through demonizing them
- Suggestions of prairie dog relocation contractors
- Increase relocation opportunities in Southern Grasslands
- Do not relocate to Prairie Dog Conservation Areas
- Revegetate prairie dog colonies with native forbs resistant or resilient to prairie dog grazing
- Use vegetation buffer zones to keep prairie dogs out of conflict areas
- Utilize soils testing inside prairie dog tunnels
- Implement a general education program about prairie dogs
- Consider the addition of native living windbreaks where practical - designed to protect crops, feed wildlife and exclude prairie dogs
- Avoid use of contraceptives over large areas of the landscape

Specific comments related to 2021 Implementation:

- Relocate from Ditzel, Lousberg and Hester rather than lethal control, or passively relocate from Lousberg
- Implement additional coexistence tactics in area
- Focus 2021 relocation efforts on leased properties with conflict, defer unleased lands (Nu West, Gallagher)
- Reduce removals around Boulder Reservoir to avoid removals in highly visible areas and issues associated with population crashes of prairie dogs and impacts to associated species
- Focus removal efforts on the Bennett property
- Treat larger blocks to eliminate the need to put barriers on each and every parcel

## **Response to Comments Related to 2021 Implementation**

Staff appreciate the continued involvement by many community members and recognize the depth at which several members of the community have considered the 2021 plans to provide productive suggestions for modifications. Many of the general comments received were related to the council decision and direction around lethal control. The intent of the Dec. 14, 2020 meeting was not to revisit the decision by City Council, but rather to provide information and collect feedback on 2021 Implementation of the City Council direction. Other comments provided helpful suggestions for implementation of restoration and soil health monitoring which will be considered by staff as specific plans are developed in those areas. Staff has included all feedback collected to ensure that OSBT can see the comments from the community, however, only those specifically related to 2021 Implementation are included below with further evaluation.

- Comment: Relocate from Ditzel, Lousberg and Hester rather than lethal control, or passively relocate from Lousberg

Staff took an additional look at the potential for non-lethal removal on the Ditzel, Hester and Lousberg properties. Lousberg may be able to be included in 2021 relocations due to the small colony size, however, since on-the-ground conditions will change through the spring, staff will continue to evaluate options on Lousberg through the spring as relocation project specifics are developed. If feasible, staff will include the Lousberg prairie dogs in the 2021 relocation projects. Staff do not think that passive relocation is an option since there is no adjacent colony to receive passively relocated animals.

Ditzel and Hester presents additional challenges to include in relocation in 2021. Both of the colonies on Ditzel and Hester properties are too large to include in the relocation projects planned for next year due to receiving site capacity, feasibility of large-scale relocations, and staffing required to support relocations. One comment suggested relocating the prairie dogs adjacent to the road on Ditzel to address the highly visible nature of these parts of the colony, but without landscape barriers to the rest of the colony, this would require additional cost to install temporary barriers and substantially increase complexity of the project to coordinate separate phases of the project with multiple contactors, and greatly increase the time required to implement this removal. Staff asserts that focusing on full colony relocations is a more efficient use of limited resources to best meet the goals and objectives included in the City Council direction and maximize the scale of relocations accomplished.

- Comment: Implement additional coexistence tactics in area

Staff continue to focus on potential for coexistence in the project area and other areas of the OSMP system as part of implementation of the Prairie Dog Working Group recommendations. There is an intention to evaluate barrier options across the system (including vegetative options as well as fencing options), continue to support the work of an external collaborative group evaluating the potential for coexistence on agricultural land, work with neighbors to support them in reducing conflict on their properties to reduce lethal control on adjacent lands, and other projects. Work to evaluate and determine coexistence

options is ongoing and will continue to be a focus of the Prairie Dog Conservation and Management Coordinator.

- Comment: Focus 2021 relocation efforts on leased properties with conflict, defer unleased lands (Nu West, Gallagher)

Properties for removal in 2021 were determined based on the set of criteria established by staff and supported by OSBT and City Council as part of the preferred alternative. These criteria include returning unleased land to a condition where it can be leased and support improved soil health. Based on these evaluation criteria, both Nu West and Gallagher were deemed high priorities for 2021 for removals. Both properties present valuable agricultural opportunities with sufficient infrastructure and potential to support sustainable agricultural operations after removal and restoration. As a result, staff will keep both properties on the list for removal in 2021.

In 2020, issues associated with relocation operations (high level of presence on property, timing of trapping, required use of insecticides, etc) made relocation on leased lands substantially more challenging and time consuming for staff. With full control over what is occurring on unleased lands, relocation contractors will have more ability to control the schedule of operations to maximize their efficiency in the relocation effort. In addition, staff time can be focused on supporting the relocation, rather than in coordination with the lessee and troubleshooting conflicts that arise.

- Comment: Reduce removals around Boulder Reservoir to avoid bad PR and populations crash of prairie dogs

The removals scheduled in 2021 in the area near Boulder Reservoir represent a removal of a very small portion of the population of prairie dogs in the area. While staff are concerned as well about impacts to associated species from removal, it does not believe that 2021 removals alone will substantially alter the ecological conditions of the larger landscape. However, staff will continue to evaluate management and consider the cumulative and landscape level impacts of removals and barrier installation as plans for implementation are developed for future years.

- Comment: Focus removal efforts on the Bennett property

The Bennett property was evaluated along with all of the removal and transition areas within the project area according to the prioritization criteria approved by City Council. This property did not reach a level of priority as high as the colonies that were selected for 2021. Staff will re-evaluate priorities based on progress on selected sites in 2021, budget and staffing availability, and the stated criteria to determine priorities for 2022 implementation.

- Comment: Treat larger blocks to eliminate the need to put barriers on each and every parcel

Staff is working to do this wherever possible while still addressing the properties that are the highest priority based on the evaluation criteria. 2021 plans for removal on Cowles and

Axelson Coot Lake are intended to build areas of removal adjacent to relocation sites from 2019 and 2020, building a larger block of prairie dog free area that will require fewer barriers and hopefully result in less recolonization over time. In addition, although private land makes removing directly contiguous areas impossible in the southern portion of the project area, Gallagher, Nu West, Lousberg, and Ditzel are all properties in close proximity to each other and adjacent to the site of relocations in 2018 and 2019.

### **Next Steps**

Staff will prepare an information item for City Council in February detailing the 2021 Implementation Plans. Staff will work through the spring to finalize details of removal plans, contract installation of barriers, relocation, and lethal control, and apply for a wild-to-wild relocation permit from the state. Lethal control will begin on planned sites once barriers are completed and outside the March 1 – May 30 prairie dog pupping season. Exact timing will be determined in collaboration with lessees on the property and contractors performing the work. Relocation will begin later in the summer. Staff is hopeful that permitting, contractor selection, and barriers can be completed by late July or early August to allow trapping to begin late summer and continue into the fall as needed. Restoration and soil health improvement on properties will begin after prairie dogs have been fully removed from each of the properties and continue through the remainder of the year.

Late in 2021, staff will once again hold an update meeting to provide the community with progress in 2021 as well as preliminary plans for 2022.