



# Parks & Open Space

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## PARKS & OPEN SPACE ADVISORY COMMITTEE MEETING

**TO:** Parks & Open Space Advisory Committee

**DATE:** Thursday, Jan. 27, 2022

**AGENDA ITEM TITLE:** Proposed Changes to Section “8.3.3. Extermination” of the Prairie Dog Habitat Element of the Grassland and Shrubland Management Policy

**PRESENTER:** Jeff Moline, Resource Planning Division Manager

**ACTION REQUESTED:** Approve staff recommended changes to Section “8.3.3 Extermination” of the Prairie Dog Habitat Element of the Grassland and Shrubland Management Policy

### SUMMARY

Boulder County Parks & Open Space (BCPOS) recommends lifting the seasonal moratorium on the lethal management of prairie dogs in order to control their populations on open space agricultural lands designated as No Prairie Dog (NPD) areas. This recommendation would require striking a portion of Section 8.3.3 Extermination of the Prairie Dog Habitat Element of the Grassland and Shrubland Management Policy (prairie dog management plan). Additionally, staff is recommending changing the title of the section to “Lethal Control” for clarity.

### BACKGROUND

#### Prairie Dog Management Plan

The county adopted a prairie dog management plan for BCPOS in 1999. At the time, staff developed the plan to comprehensively manage prairie dogs across an open space system that included a range of properties and uses. In ecologically valuable contiguous native grassland systems, the department designated Habitat Conservation Areas (HCAs) where prairie dogs would have a prominent role in the continuation of these systems and their occupancy of these sites would be promoted. Due to their large sizes, the prairie dog colonies on HCAs generally don't have many private landowners nearby. In other places, where the county leased cultivated and irrigated lands to tenants, the department would remove prairie dogs so that these properties could continue to be productively farmed without damage from them, and these became No Prairie Dog (NPD) areas. Generally, these areas are found in the parts of the county where agriculture is practiced on neighboring properties and the NPD designation fits into the landscape patterns of those areas. Finally, BCPOS manages properties with a mix of activities or areas that need buffer zones between the other two categories, and these typically have more neighboring private properties than HCAs. These Multiple Objective Areas (MOAs) provide flexibility for the department to remove prairie dogs as necessary, but the department rarely does. Thus, the plan provided for the designation of three categories for managing prairie dogs and the plan classified or zoned the acreage of each property, with suitable prairie dog habitat, into these three categories. The plan was reviewed by staff at the Colorado Division of Wildlife (now Colorado Parks and Wildlife or CPW) as well as federal wildlife managers. After public meetings, both POSAC and the Board of County Commissioners (BOCC) approved the plan.

The plan has been adaptive. It has been updated five times since 1999 to address issues that have arisen over the years or to consider the experience staff has gained. In an organization that has a mission encompassing both the protection of ecological values, systems, and resources, as well as agriculture, the plan has provided an appropriate balance to guide the department's management. Past updates have allowed trapped prairie dogs to go to the black-footed ferret recovery center, banned the use of the fumigant aluminum phosphide, and added the modeling and mapping of non-suitable habitat within MOAs and HCAs (enabling staff to more accurately understand the status of prairie dogs on open space).

### **Lethal Control**

While lethal control has been a component of the department's prairie dog management program, other methods such as relocations, donations to wildlife programs, and passive control efforts (such as the installation of prairie dog barrier fences) have been a part of the management program as well. Every year the county attempts to perform additional relocation and passive control efforts at a portion of the properties, but, as prairie dog populations continue to grow, BCPOS has been forced to use more lethal control in its attempt to keep NPD properties clear of the animals given current staffing, funding, and equipment resources. (Current policy provides for removal of prairie dogs from areas designated as NPD by live trapping as well as lethal control such as injecting the burrow with compressed carbon monoxide gas.) In 2019, the county directed an additional \$64,000 in funding for more staff, materials, and equipment. While having some notable impact, the additional resources still have not allowed staff to achieve the full removal of prairie dogs from NPD properties. BCPOS staff believes that part of the reason is that the moratorium on lethal control allows for dramatic reproduction and dispersal into NPD areas annually each spring.

In the 2000s, CPW had a regulation that prohibited the trapping of prairie dogs from March 1 to May 31 unless that trapping was followed up with lethal control to avoid leaving pups in burrows where adults were removed. At that time, BCPOS did not want to be in a position of performing lethal control during the same springtime season due to public concerns over how lethal control was handled. The 2012 prairie dog management plan update reflected this:

“Exterminations will not occur during the pup rearing season of March 1-May 31.

This timeframe was selected to capture the peak rearing season to limit the potential of young being left unattended in the burrows. The exception will be in cases where dispersing individuals attempt to colonize an NPD without prairie dogs. If these areas are free of prairie dogs as of March 1 of each year, direct lethal control may be used to prevent recolonization during this period.”

### **Prairie Dog Impacts on the Agricultural Program**

BCPOS manages 25,000 acres of agricultural lands, 16,000 of which are croplands. These croplands generate approximately \$1.3M per year in revenue for the county and are managed by 67 tenant farmers. There are 3,588 acres of known prairie dog colonies on BCPOS lands with only 768 acres of prairie dog colonies on NPD lands, which represents approximately 4% of the cropland. The table below and the Attachment 1 map provide more detailed information. When crop damage occurs due to wildlife, including prairie dogs, BCPOS reimburses those tenant farmers and when the problem is severe enough, has discounted their

rent by up to fifty percent. On average, this costs the county approximately \$18,000 per year in lost revenue due to crop damages and rent discounts. The prairie dog management program itself costs \$206,000 annually, primarily in staffing and equipment.

**Suitable Land Inhabited by Prairie Dogs (2021)**

<b>Land Designation</b>	<b>Occupied</b>	<b>Total</b>
Multiple Objective Area (MOA)	1,150	3,700
Habitat Conservation Area (HCA)	1,670	4,520
No Prairie Dog (NPD)*	768	17,198
<b>TOTAL</b>	<b>3,588</b>	<b>25,418</b>

\*Suitable refers only to MOAs and HCAs

**ANALYSIS**

In 2004, BCPOS had 731 acres of prairie dogs on NPDs and, despite 17 years of management, in 2021 there are 768 acres on NPDs, a 5% increase. While a portion of the increase in colonized NPD acreage over that time frame is due to the department’s acquisition of additional cultivated agricultural lands, most of this static, which reflects the challenges associated with clearing these lands of prairie dog colonies, and is due to the enormity of the task. For example, since 2017, staff have treated approximately 140,500 burrows and trapped over 7,200 animals. And still, prairie dogs remain on NPD areas. The key reason is staff’s inability to keep up with the annual dispersal and growth of populations back into NPD areas, and this is tied to the effect the moratorium has on the annual population and management cycles.

Prairie dogs give birth in the spring and can raise up to four pups annually. Implementing lethal control at this time of year reduces the population before the reproduction cycle dramatically grows the number of animals. Additionally, the environmental conditions from March to May facilitate the effective application of lethal control.

Staff experience has demonstrated that the moratorium exposes more prairie dogs to lethal control in the long run, since populations increase during the spring, then staff must lethally control the new additional prairie dogs on these NPDs. Therefore, more prairie dogs need to be lethally controlled and more staff time is spent on the task of keeping NPDs free of prairie dogs. Changing the plan to eliminate the lethal control moratorium will result in less overall prairie dog mortality when compared to status quo management over the course of management on NPD properties. Additionally, greater control in the NPD zones will benefit agricultural tenants, neighbors, and the BCPOS program. Finally, more effective control should provide BCPOS staff the opportunity to address other prairie dog management activities with less overall emphasis required on NPDs.

**PUBLIC COMMENTS**

At this year’s annual Prairie Dog Stakeholders Meeting held on Dec. 14, 2021, staff introduced the idea that a change to the moratorium in the plan could result in some impacts to the departments program. Staff received 45 comments and questions in the “Q and A” feature of the meeting and responded to all the verbal questions and comments at that time. The day after the meeting, the staff recommendation was posted to our website and a

comment page has been available for receiving public feedback since then. Thirty-three comments have been received as of Jan. 11, 2022. All of these comments are included in Attachment 2.

### **RECOMMENDATION**

Staff proposes removing the seasonal moratorium on lethal control by striking a portion of section 8.3.3 Extermination of the Prairie Dog Management Plan. Staff proposes to remove the springtime (March 1 – May 31) moratorium on lethal control to increase effectiveness of management and to reduce the number of prairie dogs annually killed. Additionally, to provide clarity, staff recommends the section be retitled “Lethal Control” instead of “Extermination.” A redline version of the changes is below:

#### **8.3.3 ~~Extermination~~ Lethal Control**

BCPOS staff will continuously research the efficiency and expediency of all control methods in an attempt to minimize undue stress to the animals. ~~Extermination~~ **Lethal control** substances may include lethal gases, such as CO<sub>2</sub> or CO, no chemical rodenticides are permitted for use by Parks and Open Space staff or by tenants. Prior to ~~extermination~~ **lethal control**, BCPOS staff will perform an on-site inspection of the area to identify precisely the area to be ~~exterminated~~ **controlled** and the extent of the work to be done. Assessment of active burrows will occur, and only those deemed active will receive treatment. Any holes deemed inactive will not be treated, and may not be closed, in an attempt to minimize non-target species impacts.

~~Exterminations will not occur during the pup-rearing time period of March 1–May 31 annually. This timeframe was selected to capture the peak rearing season to limit the potential of young being left unattended in the burrows. The exception will be in cases where dispersing individuals attempt to colonize an NPD without prairie dogs. If these areas are free of prairie dogs as of March 1 of each year, direct lethal control may be used to prevent recolonization during this time period.~~

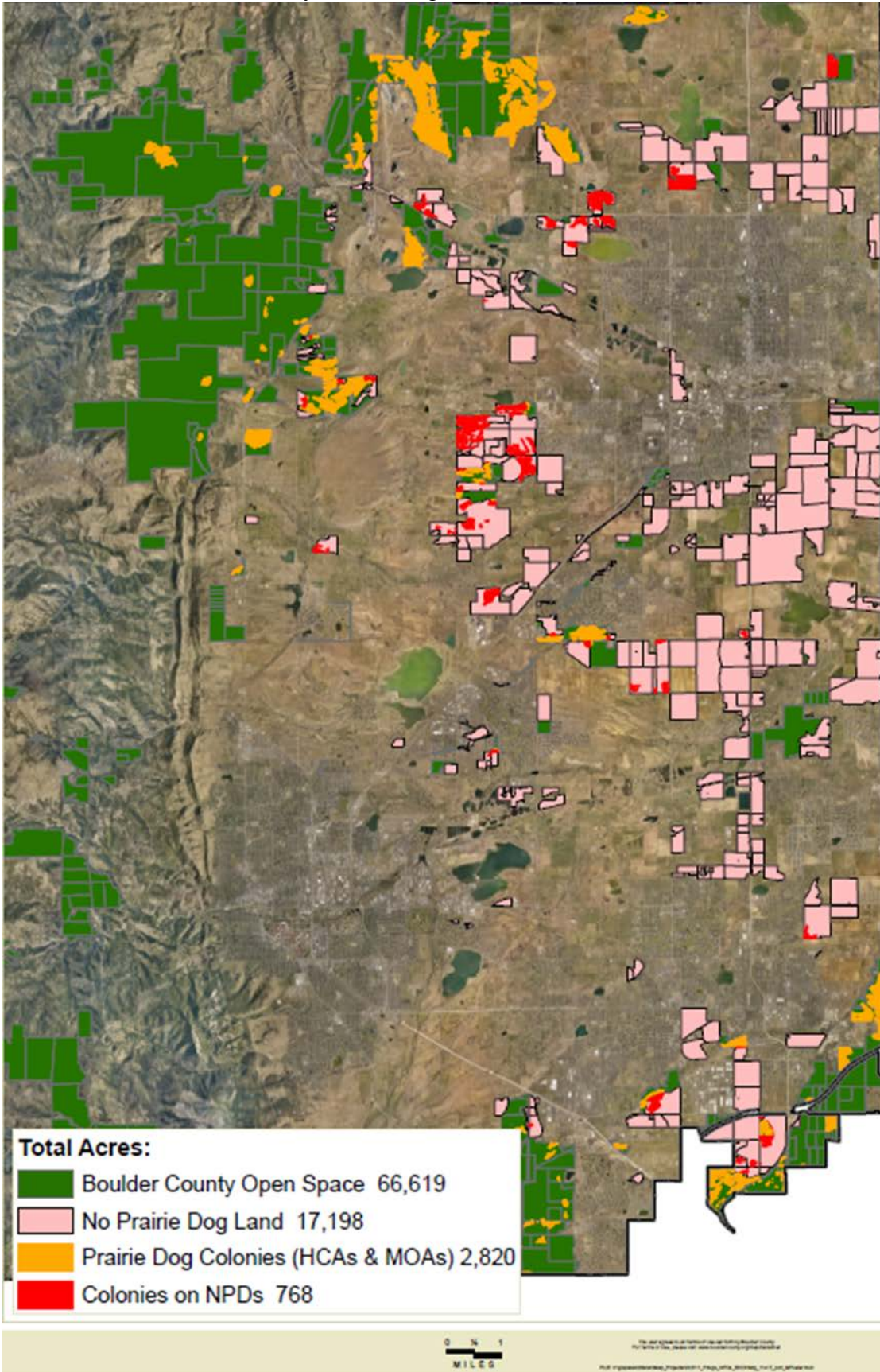
After the initial treatment, follow-up treatments may occur within two to three days of each other, depending on weather conditions. When ~~extermination~~ **lethal control** has been completed, staff will inspect the site. Follow-up monitoring and management will strive to discourage recolonization.

#### **POSAC Action Requested**

Approve staff recommendation on the Prairie Dog Element of the County’s Grassland and Shrubland Policy.



Attachment 1. Boulder County Prairie Dog Colonies



Attachment 2.

- A. Questions/Comments/Answers from Dec. 14, 2021 Prairie Dog Stakeholder Virtual Meeting
- B. January 16, 2022 Capture of Comments on BCPOS Prairie Dog Webpage

# Question

- 1 How will the commissioners get information from participants wanting to weigh in on ending the
- 2 What is the process to change designations from NPD to HCA or MOA and vice versa? Boulder, CO
- 3 Can we get copies of the maps that shows the different areas that are being managed?
- 4 How many prairie dogs do you estimate were killed on the 318 ac of lethal control?
- 5 Rob, can you explain the difference between "cartridges" and "compressed CO?"
- 6 Can you please include the property names on maps provided on the website?
- 7 29678 treated burrows on 318 acres equates to about 93 burrows per acre? am I reading this  
for live questions , will this be at the end of session? I have questions and issues with the destruction of
- 8 my property which borders a colony north of highland reserv #2...I would prefer to ask questions live
- 9 Can you please add me to the volunteer list for barrier installation?
- 10 When did you start dusting the colonies in what year and has this been the reason we have not seen  
Unfortunately that has not worked as nothing has been done. I was invited to this meeting to discuss
- 11 the issue that not only affects my property but at least 6 other neighbors  
Is the SPV & Dust abatement working? I.e: are colonies still succumbing to plague with this management
- 12 being implemented? If colonies are still dying even with this protection, why do you think this is?  
This dust is known to affect insects, amphibians and bees how can county and city be using this product
- 13 with these affects on other species and also the soils
- 14 When was the moratorium implemented
- 15 David Kelley  
I your relocation methods you are impacting in the grounds thousands of lbs of plastics that are not
- 16 removed. Roads are created and soils disturbed creating more room for invasive weeds. these methods
- 17 When was the moratorium implemented
- 18 Susan, did you say 1/3 of the 5,000 ac complex at Rabbit Mtn is suitable habitat for PDs?  
Can you tell me what agricultural properties and/or natural resource promotion have been improved or
- 19 changed by the colony preserve next to Highland 2 irrigation reservoir so I can keep that in mind as I ask
- 20 This relocation is outrageous, nesting boxes outrageous use of plastic. You should stop your relocation
- 21 With global warming all your relocation numbers should be reduced to save our grasslands  
Why are any prairie dogs being killed when you also have a goal of re-introducing black footed ferrets
- 22 and only 52 acres are occupied on the land you want to reintroduce them to?  
Susan mentions PD's at Holmberg diminishing due to high grass==assuming it is just due to precip. Why
- 23 no mention of taller grasses planted during the early summer on HCA?MOA land?  
But, what is the process to change designation once it's been designated? is there public comment or a
- 24 public process to provide input or make recommendations on designations?  
thank you Rob, did I mis understand this that the prairie dog preservation colonies are also for the  
purpose of promoting agriculture on the actual property? so I was wondering what the agriculture
- 25 promotion goals were for the DeBerry ? I had thought it was leased for pasture but what are the ag
- 26 Hi Amy,  
and neighbors lands that adjoin these properties. No longer is the PD acting as keystone species on this
- 27 That dust has changed the biology of the soil forever dropping it down a hole is not changing that.  
I feel for you Patricia, so sorry that you have this happening. Boulder Valley Ranch is a mess and the  
prairie dogs have destroyed hay fields, pastures and is riddled with holes. Worse and worse, it is time
- 28 for them to go, no matter what the method. Fencing mitigation is really not a great solution. We all fear  
Patricia, Colorado is a fence out state, so maybe you should construct a barrier fence to keep the prairie
- 29 dogs out instead of the tax payers having to pay for your problems.
- 30 thanks Rob, will look forward to meeting you with a resolution

Hi Amy, I thinkg the ferret intro is a good idea but realistically we do not have the contiguous acreage in  
31 our fragmented landscape. Good luck with this study.

Yes and precipitation and tall grasses was great at Gunbarrel Hill and the restoration. Now with dorught  
32 and colonies out of control gunbarrel hill is losing ground. Southern Grasslands will be destroyed if they  
33 Agree removed 100 percent and lets get on with it.

34 Yes, thats a lot, very dense. Its something we need to talk about at some point in time Rob.

35 Why do you despise Prairie Dogs so much?

Boulder County Horse Association supports lifitng this moratorium so you all can do your jobs when you  
36 need to. Keep working on clearing our ag properties so we can continue agricultural practices in the  
37 I'll bet they can be very resilient.

38 kudos to all the man/woman hours you have all put in. Let's vote to let tham do their jobs all year-

You should show all the comments. This isn't for the public unless you are transparent. And here is a  
39 solution...stop spending money on killing them and quit supporting welfare ranchers.

Will all of the 300 prairie dogs in field 7 at Carolyn Holmberg Preserve be relocated in 2022? Parks and  
40 Open Space is proposing to kill more prairie dogs on county land on NPDs by eliminating the  
41 thanks Steven well said.

42 Would the moratorium only apply to NPDs?

I have another meeting to attend. Will the rest of the questions be posted or the rest of the meeting be  
43 posted on the website? Can you send me a link to this if so. Comments on the info presented tonight

44 I would like my questions answered before the end of this meeting. Thank you.

45 Money, mortality and trauma to our grasslands.

A I do not think we should be preventing plague. We should allow it to clear our lands of a species which

B Birds of prey so prefer rabbots and mice. Rarely do you see them eating a PD"



# Answer(s)

1 live answered

2 live answered

3 We will make the presentaiton available on our website after this evening's meeting

4 This may be best addressed by Susan but in short, we simply don't have a a method to determine that

5 live answered

6 We will work to get maps depicted the categories on our properties with the names uploaded to the

Yes, hta is correct. While there is a fair amount of variability in burrow densities, since 2019, we hve seen a significant increase in the poulations and burrow densitis on most of our NPD properties. One

7 of the implications of this is that it takes much longer to progress across a particular area with

Thank you, when Susan is done with her presentation in about 15 minutes we will take questions on our management and that would be a great time for you to ask your question. For specific property

8 situations, it's likely that staff will need to work individually with you off-line to discuss details.

9 Definitely will do.

10 2017. This has been helpful to control plague, but in general we are seeing less plague in the county

Patty, I agree that you have had some significant impacts and that we need to meet to evaluate wht we can do together. Hopefully we can get together in the first half of January. I will be in contact with

11 you. You have been very patient and I regret that we have not been able to do much to this point to

It appears to work well when SPV and dust are used together. We did not dust one year at SE

12 grasslands and had the low concentration bait. That is likely the issue there...

13 Correct. Hopefully this was answered via live answer.

14 We will be answering this in the next meeting section.... but 2012 is when we instituted the lethal

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16

17 2012, we will be getting into details on this in the next meeting segment.

~2,300 acres are suitable within the Rabbit Mtn Complex. We will also have an additional 700 acres

18 added to the total acreage once the restoration of the mine site is complete. (Cemex mine)

The OS property adjacent to your operation is the DeBerry Property. While it is leased for agriculture, 19 it is rangeland.... not cropland. As such, it is designated as MOA, not NPD.

20

Linda, we have not done a lot of relocation for some time but when we do perform relocation, we

21 look at potential relocation site to identify areas where the plant community is able to support the

22

23 live answered

Lindsey, that is an interesting question. Our Policy does outline the criteria for designation very

24 clearly. We've never had a public process related to designations due to the criteria being outlined in

25

26

Hi Linda, We do not do plague mitigation across the county. The two properties we are doing mitigation on is solely for the purpose of bolstering the colonies in hopes of reintroducing ferrets.

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32 Linda, those areas are owned/managed by COBOSMP

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34 I would love to discuss and get some of your insight. It has been a challenge.

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42 Yes. Any removal on other designations would still be very limited and only done during the season.

43 yes, our goal is to post all of the comments/questions that have come in this evening

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#

After this meeting, Parks & Open Space will open up a section of our website to accept public comments. Those comments will be compiled and shared with the Commissioners when we present

1 this issue to them in February

2 We will answer this live during question period.

3

4

Cartridges are a combination of sodium nitrate and charcoal. The byproduct produced is carbon monoxide. The compressed CO is a machine that blows the air/carbon monoxide down the burrow.

6

Hi Pam. Two points on your question. We do not keep track of acreages that tenants treat nor do we account for retreated burrows. However, we are seeing upwards of 60 to 70 burrows per acre on

7 several properties, which is pretty darn high.

8



# Prairie Dog Management Public Comments

*Most recent comments are shown first. There are 62 comments.*

## **Shari Depauw**

**Comment #62**

*Boulder*

Jan 16, 2022

Killing pups and nursing mothers?! That's the most inhumane thing ever. I don't think there's any regulation anywhere in the country that allows the killing of nursing mothers and babies of any mammalian species, simply because of the level of cruelty that involves to sentient beings. It is appalling what Boulder has become, and if you approve this, that takes you to a whole new depth of inhumane atrocity. Do not allow this.

## **Patinberg Francois**

**Comment #61**

*Soisy*

Jan 16, 2022

It's so sad to read comments approving this lethal solution... How can you talk about ecology when you're thinking of removing a keystone specie already reduced to 1% of its initial population. Think twice about it and please avoid taking this horrible solution.

## **Patrice Tullai**

**Comment #60**

*Port Orchard*

Jan 15, 2022

No, no , no killing prairie dogs. They are a very important species. A keystone species. There is only one percent of them left. We cannot afford to lose one more. If you must not allow them on specific lands, allow them to be relocated. Why murder an innocent creature that does so much to help our eco system. It makes no sense, it only looks evil and wrong. No more killing. My old neighborhood is no longer the same. To see and spend time with wildlife is what makes life good. Otherwise we become cold and shallow. No More Killing wildlife.

## **Helen Braider**

**Comment #59**

*Boulder*

Jan 15, 2022

Attached is a photo I took out in Open Space last week. It shows all too clearly what is happening to our top soil without the grasses to hold it in place. This is one of the areas stripped bare by prairie dogs. Please lift this moratorium on controlling prairie dog populations. We cannot pretend that this can return to a natural situation anymore. Humans have done too much already just starting with turning prairie into pastures and finally with climate change. We need to step up our management to preserve what little is left of our natural world. And I am afraid full prairie dog control is one tool we have if we want to

keep our Open Space from turning into a wasteland.

[Download Attachment](#)

## Richard Reynolds

**Comment #58**

*Boulder*

Jan 15, 2022

I support the proposed changes. I have written previously about the ecologic damage wrought by PD presence and relocation to native grassland followed directly by decimation of native plants and their replacement by invasive plants. (Native-plant settings harbor critically important species, such as insects; soil microbiota, etc. that don't tug at our hearts; we just don't see them.) In many cases, lethal-control elimination of PDs from some areas is regrettably preferable to relocation. Thank you.

## Richard Jorgensen

**Comment #57**

*Longmont*

Jan 15, 2022

I support lethal control of prairie dogs in all of Boulder County. They are a constant problem to me and my property which adjoins both city and county open space. They are also destroying the open space property on which they dwell. Please be a good steward of the land you manage.

## Karl Kellogg

**Comment #56**

*Boulder*

Jan 15, 2022

The prairie dog populations in Boulder County are clearly out of control due mostly to lack of their normal predators. The only viable solution is the lethal one, which I firmly support

## Amy Strombotne

**Comment #55**

*Longmont*

Jan 14, 2022

If you eliminate the moratorium on killing prairie dogs during rearing season, please add undeniable wording that states that no form of live trapping will be allowed during the former moratorium time.

Watch the National Geographic video "Harsh Reality of Saving Endangered Ferrets". And then consider what the next video would look like if that crate of prairie dogs contained females who appeared to have been trapped just after giving birth. Or if one of her pups were in that crate with her. That is not the part of your program that you want the public to focus on, right?

I am asking because it breaks my heart to see what these prairie dogs go through in this video. And I sincerely hope that we can at least spare new colony mothers this slow, terrifying, unnatural death.

**Bill Howland****Comment #54***Boulder*

Jan 14, 2022

I am in favor of adopting the changes proposed by staff with regards to the prairie dog lethal control moratorium since it appears that we are not effectively dealing with the issue despite expending considerable taxpayer dollars. Since the County still retains the right to designate which lands would fall under the proposed guidelines, the degree to which this mitigation is pursued can be adjusted as necessary. I don't believe that adding an additional tool to our program means that it has to be applied in every setting, and I am comfortable with letting our experienced staff use this added control method when and where it seems most needed.

**Dan Yechout****Comment #53***Boulder*

Jan 14, 2022

I support removing the lethal control moratorium on prairie dogs. I live on a 30 acre property in Boulder County. We raise organic, grass fed beef. Prairie dogs are a constant threat to the health of grasslands and local agriculture. Thank you.

**Ted Binder****Comment #52***Longmont*

Jan 14, 2022

I support the proposed changes to allow Prairie Dog control year round.

**Amanda Vandever****Comment #51***Boulder*

Jan 14, 2022

I endorse lethal control for prairie dogs. They devastate the land.

**Stacey Smith****Comment #50***Henderson*

Jan 14, 2022

What is wrong with you people?? Prairie Dogs only have 48 Acres of (viable Prairie Dog Land).... You need Prairie Dogs to have a healthy Colony of Black Footed Ferrets. Not only that, STOP KILLING THE PRAIRIE DOGS. You People should be ashamed of yourselves!! Sickeningly pathetic is what you want to do, and what you are for doing it.

**Robert O'Donnell****Comment #49***Longmont*

Jan 14, 2022



Good afternoon,

I am writing this note in support of removing the moratorium and allow for lethal control of prairie dogs during the months March 1st through May 31st. As you have heard from many folks, and some my neighbors, the collateral damage from the prairie dogs has become extreme.

My house and property are adjacent to (County Ag lands zoned NPD - No Prairie Dog Zones) on the south and east side. The open space land is a moonscape with the primary vegetation being thistle, cheatgrass and dirt.

Below is summary of the damage I have incurred from the prairie dogs located around (next) to my property. I continue to battle the prairie dogs on a monthly basis but I am losing.

I would also like to take a moment and let everyone know I am not a killer. We have been labeled as such by those who truly don't understand the grave situation. When I moved onto this property and area 30 years ago, there were no prairie dogs. To protect my land, I have been forced to take extreme measures which would not be occurring if the lands had been properly managed and the prairie dogs were kept in the areas designated as such. So please, allowing the moratorium to be lifted will give us a chance to manage the prairie dog population and also save our properties from further destruction.

- 1) Currently 48 holes located on the property (2.8 acres)
- 2) Holes located on the south/southeast of my property (back yard, 11,000 sq.ft/ total approx. 21,000 sqft) and holes located on the north/north east of property (front yard, 17,500 sq.ft/ total approx. 39,000 sq.ft)
- 3) Holes in back yard and front yard are also my hay fields
- 4) Holes located on residential landscape our proper (where weekly mowing occurs)
- 5) Holes located in septic field (north part of property) Sand from septic field brought to surface from prairie dog digging.
- 6) 700 feet of four strand barbed wire fencing destroyed from cows pushing fence from open space. This is the fence that runs on the east and south side of my property
- 7) 48 holes for my horses to fall into and possibly break a leg
- 8) Ongoing and cost associated with the collateral damage brought on to my property by the prairie dog
  - a) 700 feet of 4 strand barbed wire fence surrounding my property on the east and south needing complete replacing: \$4000.00
  - b) Septic field replacement: \$25,000.00
  - c) Grass/seed replacement south and north approx.  $\frac{3}{4}$  acre 50 pounds + labor: \$300.00
  - d) Holes fumigated in 2018: \$495.00 Kill 100% only good for two months
  - e) Initial chicken wire installed for prairie dog mitigation (700 ft) 50 foot x 4 foot sections + labor: \$630.00 + \$640.00 = \$1270.00 destroyed by cows and prairie dogs. None existent on north property, front, some remains on south property, rear
  - f) Current bi monthly fumigation/mitigation cost per treatment (doing myself) materials and time: \$400.00 Kill good for 1-2 weeks and then reinfested by Open Space prairie dog!!!!!!
  - g) Annual cost of loss of hay in front and backyard, 30 bales: \$300.00
  - h) Annual cost of loss of hay at Brewbaker property: 60 bales: \$600.00

Thank you for your time.

Robert and Lynn O'Donnell

## David Hester

Comment #48

*Boulder*

Jan 14, 2022

James and Adrienne Hester have been rural landowners in unincorporated Boulder County since 1968. The rural agriculturally-zoned property owned by the Hester Family has been used for cattle-ranching and hay cropland production.

One of Boulder County's Goals in their Prairie Dog Management Plan is the "maintenance of croplands for agriculture" and the Mission Statement for Boulder County Parks & Open Space includes "promote and provide for sustainable agriculture."

Boulder County Parks and Open Space own 66,619-acres within the County that are classified into Habitat Conservation Areas (HCA), Multiple Objective Areas (MOA), and No Prairie Dog (NPD) areas.

The Boulder County Open Space Prairie Dog Management Plan defines NPD Areas as "not appropriate prairie dog habitat by virtue of their land use."

Boulder County NPD Areas are often lands being leased for agriculturally production generating revenue for the County and (or) adjacent to private Boulder County land that is still zoned and being used for agricultural purposes.

NPD Areas in Boulder County account for 17,198-acres or 25.8-percent of total Boulder County Open Space lands.

As of the 2021 Boulder County Annual Prairie Dog Meeting, there were 4.4-percent or 756.7-acres of the NPD-zoned areas still occupied by active prairie dog colonies.

In 2021, Boulder County spent 20-percent of their Annual Agricultural Budget for lethal control of prairie dogs on what amounts to 1.1-percent of their Total Boulder County Open Space lands.

Allocating 20-percent of the Annual Agricultural Budget towards management of prairie dogs on 1.1-percent of Boulder County's Open Space lands is a fiscal imbalance and takes funds away from other Boulder County Open Space land management priorities.

Boulder County Agricultural Resources is the only Parks & Open Space Division that is self-funded by revenue being generated by leases of the 22,000-acres of productive agricultural land; especially the 12,678-acres of irrigated agricultural land.

Management and lethal control of prairie dog colonies on Boulder County NPD areas is a population control issue that cannot be suspended during the Pup-Rearing time period of March 1st through May 31st.

Suspension of prairie dog lethal control during the March 1st through May 31st time period is resulting in an infinite loop for managing prairie dog populations continuing to expand and inhabit what Boulder County has defined as "No Prairie Dog" areas.

As long-time rural agricultural landowners in Boulder County, the Hester's are in favor of changing Section 8.3.3 of the Boulder County Prairie Dog Habitat Element of the Grassland and Shrubland Management Policy to eliminate the seasonal; that is Pup-Rearing time period, moratorium on using lethal control for management of prairie dogs on Boulder County Open Space lands zoned as NPD areas.

## **Andy Breiter**

**Comment #47**

*Lafayette*

Jan 14, 2022

I am writing in support of lifting the moratorium on lethal control of prairie dogs. I am a farmer who raises beef cattle. I support lifting the moratorium on BCPOS land that is designated to have no prairie dogs because to me it makes no sense to allow lethal control for only part of the year. This appears to create a situation where it will only have us paying for more lethal control down the line. If we want no prairie dogs in certain areas, it seems advisable to allow lethal control throughout the pupping season so as to not let the prairie dog population expand. From my understanding, under the current policy this moratorium simply means that over time BCPOS is spending more money and killing more prairie dogs. This effect does nobody any good. For this reason, I believe we should lift the moratorium.

## **Larry Longseth**

**Comment #46**

*Longmont*

Jan 14, 2022

As someone who owns acreage and leases pasture from Boulder County, and other private owners, our work increases dramatically in the Spring because of all the prairie dog pups. Maintaining good healthy pasture for my cattle is Very difficult with prairie dogs constantly destroying the grass. The prairie dog mounds make it impossible to irrigate, and over time the grass dies with nothing left for grazing. In addition there is always risk of the cattle stepping into a prairie dog hole and injuring a foot or a leg. It's a viscous cycle without more opportunity to control the increase in prairie dog population.

## **Vanessa McCracken**

**Comment #45**

*Longmont*

Jan 13, 2022

On January 10th, the Board of Supervisors for the Boulder Valley Conservation District considered the proposal by the Boulder County Parks & Open Space Department to revise the Prairie Dog policy 8.3.3 regarding the springtime moratorium on lethal control on County Agricultural lands in NPD – No Prairie Dog zones. The Board is supportive of the proposed changes including elimination of the current moratorium period of March 1st through May 31st in favor of a year-round allowance for prairie dog control. After decades of investment in staff time and money since 1980 on county open space ag lands in an attempt to counter the crop losses and plant cover decimation directly related to overpopulation of

prairie dogs, it is time to give POS staff more leeway to manage the ag lands in the NPD zones.

Thank you for your considerations.

## **Vanessa McCracken**

**Comment #44**

*Longmont*

Jan 13, 2022

On January 11th, the Board of Supervisors for the Longmont Conservation District considered the proposal by the Boulder County Parks & Open Space Department to revise the Prairie Dog policy 8.3.3 regarding the springtime moratorium on lethal control on County Agricultural lands in NPD – No Prairie Dog zones. The Board is supportive of the proposed changes including elimination of the current moratorium period of March 1st through May 31st in favor of a year-round allowance for prairie dog control. After decades of investment in staff time and money since 1980 on county open space ag lands in an attempt to counter the crop losses and plant cover decimation directly related to overpopulation of prairie dogs, it is time to give POS staff more leeway to manage the ag lands in the NPD zones.

Thank you for your considerations.

## **Gary Flauaus**

**Comment #43**

*Longmont*

Jan 13, 2022

As a Farm property owner in Boulder County I sure do get tired every Spring having to deal with the new Prairie Dog pups showing up followed by the resulting dispersal of the previous year's pups onto my property as well as from my neighboring farm properties.

I sure think this problem could be minimized if the 3-1 through 5-31 timeframe moratorium on removing these critters could be lifted in order to reduce the current cycle of having us farmers take time away from our regular chores by having to spend that time resolving this problem ourselves.

Thank you !

## **Cody Oreck**

**Comment #42**

*BOULDER*

Jan 13, 2022

see attached PD Moratorium letter or:

I write to support lifting the Moratorium to allow lethal control year-round on 'NO PD' zoned agricultural acreage. I do so in recognition that, under current management approaches, this has become the only option available to reverse the spreading degradation and desertification of our county public agricultural lands as a consequence of overgrazing by prairie dogs and/or cows and the fragmentation of our lands through urban sprawl.

Through conversations with both public and private land managers, a number of them County

employees, it appears we are not effectively implementing the lethal control authority we currently have. Specifically, insufficient fall and winter lethal control and cleanup are allowing remnant populations to simply repopulate the areas in which we are investing hundreds of thousands of dollars to clear prairie dog impacts.

Here are some things we all need to know and to question:

1. Rigorous stewardship is needed on all of our public lands but our 'No PD' designated agricultural acreage should be prioritized.
2. If lethal control is accomplished in the late fall with rigorous 'clean up' over the winter, then lethal control during pupping season should be minimal.
3. Any kind of prairie dog control (including the county's work on private property and passive relocation of prairie dogs) should be followed up with MAINTENANCE—of barriers, buffers and with constant vigilance, especially on 'NO PD' lands.
4. Are we under-staffed or under-funded to manage our county agricultural lands effectively? If so, why?
5. As a community, we taxed ourselves to buy land but are we not willing to tax ourselves for managing these lands carefully?
6. If a thing is worth doing, shouldn't we do it right?

Proper management of our public ag land--to include regenerative agricultural techniques--represents to me our greatest opportunity to address climate change, water retention and fire resilience and our community's human health in right relationship to the millions of species of wildlife we must depend upon.

Respectfully submitted,

Cody Douglas Oreck

203 Morningside Park Road, Boulder CO 80304.

[Download Attachment](#)

## Daniel Moorer

**Comment #41**

*Longmont*

Jan 13, 2022

My wife and I understand and agree with the science-based statement that the prairie dog is a keystone species. However, that statement assumes that a prairie-dog population is not out-of-control. Personally, we've experienced, first hand, the effects of an out-of-control prairie-dog population. It turned all of our land into a dirt lot where the topsoil blew away every year. To fight back, we've expended tens of thousands of dollars on control and on rebuilding our topsoil and reestablishing natural grasses. But, in nearby county open space where prairie-dog overpopulation is not controlled, we continue to watch the wind, every year, remove incredible amounts of topsoil. That occurs because, in heavily over-populated areas, little vegetation remains to hold the soil in place. Now, the County's Parks and Open Space is doing a good job beginning to reduce the over-population. They appear to be following the science (Crosby and Graham, Population Dynamics and Expansion Rate Of Black-Tailed Prairie Dogs, 1986, p.114) which states that, with few predators, a prairie dog colony will approximately double each year; that is, ". . . it would be necessary to achieve a minimum of 55% yearly reduction simply to maintain the population at the prior level . . .". Given the results of this research, the moratorium should be lifted NOW: (1) so that Parks and Open Space can control the prairie-dog over-population while it is in the process of doubling; (2) so that Parks and Open Space may eventually achieve a long-term stable

number of prairie dogs on selected, maintainable areas; (3) and so that this can be accomplished at the most efficient annual cost to the taxpayer. In this way the County can achieve, in a few years, a healthy and stable prairie-dog population, balancing its needs with those of the local agricultural community.

## David Kelley

Comment #40

*Longmont*

Jan 13, 2022

Please see attached file. Thank you.

[Download Attachment](#)

## Jerry DeBruyne

Comment #39

*Longmont*

Jan 13, 2022

Please see attached file. Thank you.

[Download Attachment](#)

## Teresa Arrospide

Comment #38

*Loveland*

Jan 13, 2022

This change to control prairie dog populations should be put on the 2022 ballot, so everyone can have input

In April burrowing owls return to Colorado and stay until late September. The burrowing owls are a threaten species in Colorado. Burrowing owls live in prairie dog communities raise their young, and eat prairie dogs. I feel the new proposed plan will further harm a threaten species in Colorado. I see the plan is to used CO2 and not chemicals, but it is very likely during process burrowing owls will be killed accidentally. So year round lethal control on prairie dog should never occur.

All I am seeing here is few people with the loudest voices are going to make decisions for the county and state. I feel this should be put on 2022 ballot, so everyone can have input and not a select few.

## Teresa Arrospide

Comment #37

*Loveland*

Jan 12, 2022

I do NOT support the proposed change to control the prairie dog populations. Please relocate the prairie dog populations.

Burrowing owls in Colorado are now listed as an endangered species and they often use prairie dog burrows as their homes, and sometimes eat prairie dogs. My concern is the poison used to kill the prairie dogs will threaten the endangered burrowing owls and other wildlife in Colorado. Typically burrowing owls arrive in April for breeding season and stay until September. How do you know all the prairie dogs

killed by poison are ALL removed and do not kill other species like the burrowing owl, coyotes, badgers, weasels, golden eagles, and large hawks. A lot of Colorado revenue comes from the tourism industry and people want to see the wildlife. Please protect the prairie dogs.

## Michael Moss

**Comment #36**

*Niwotq*

Jan 12, 2022

As a tenant of Boulder County Open Space I feel strongly that the prohibition on lethal control in the pupping season should be removed.

The challenge that I see directly around the county is that the control of prairie dogs is a never ending cycle. The prohibition on lethal control during the pupping season allows the problem of infestation in targeted areas to be never ending. Every pause during the pupping season allows a new generation of prairie dogs to establish themselves, forcing the County to start the process over every year. I feel that this is more inhumane than stopping proliferation once and for all.

Please amend the policy and untie the hands of our BCPOS staff to do the job mandated by the County.

Thank you

## Jill Skokan

**Comment #35**

*Longmont*

Jan 11, 2022

We are VERY much in support of the proposed change to year-round prairie dog controls. We have found that controls in early spring are critical and allow a population to be kept in check much more effectively (with the need to control fewer prairie dogs over a smaller area), ultimately resulting in fewer overall prairie dog deaths, reduced labor, and expenses.

In addition, we VERY much appreciate the mitigation that happened in 2021 on the Platt property next to ours. It really helped. It was in the nick of time for many of the neighboring properties... not soon enough for others who are really struggling to feed their livestock, but it still helped them. The prairie dogs have expanded exponentially, on the mesas and steep slopes, irrigated cropland and pastures, dry land, and to the neighbors all around us.

## Dennis Cooper

**Comment #34**

*Fort Collins*

Jan 11, 2022

I wish to encourage the powers that be to adopt the staff recommendation of removing the "moratorium" language from the current BOCO Cropland Policy.

As the former Manager of the BOCO POS Ag. Resources Div. I found two issues in the Cropland Policy were virtually impossible to deal with based on science or logic. The new commissioners have now, after



careful examination of the GMO policy, rectified the first issue.

The second policy issue that was non-science based was the so called "moratorium" on lethal control of Prairie Dogs. Before I applied for the Ag Div. Mgr. job, I carefully studied the Cropland Policy and felt the No-Prairie Dog (NPD) designation for croplands sounded just about right. It was only when I was hired and on the job that I understood that NPD really looked more like Never-Ending Prairie Dogs, partially as a result of the moratoriums impact on the County being able to reduce colonization on NPD designated crop / range lands to a level that was sustainable for viable operations.

I was told the moratorium language was merely a holdover from a much earlier time, when ONLY live trapping of animals was permitted, raising the specter of pups starving to death if the mother had been trapped and removed. No one takes pleasure in or wants to see animals suffer and the humane job that is done by the County PD Control team, capably led by Amy Schwartz, is probably one of the most difficult, but necessary jobs in the entire County. The crew is limited in terms of staff, budget and time (their ability to work during the moratorium). Control would only occur during the current moratorium period on a handful of selected properties where the numbers had already been sufficiently reduced to justify the complete removal of PD's from a given area. It is physically impossible for the crew to blanket the entire county. There are places where PD's can be tolerated and encouraged to live and provide habitat for reintroduction of the endangered natural predator Black Footed Ferret.

Humane lethal control is just what the name implies, the use of PERC machines and/or Carbon monoxide cartridges are both recognized methods of humane control of Prairie Dogs when they encroach on NPD areas. Humane lethal control would happen on adults and pups alike AND in the long run it will result in far less lethal control than what occurs with the moratorium policy in place where the PD crew makes reductions in population on a given field only to be inundated by a whole new generation that was missed during the moratorium.

The only sane and scientific method to PD control on areas where they are not desired, is to take the numbers on that given property down to NPD (ZERO or very near ZERO) at which point further use of lethal control will be minimized for years. We were never able to actually prove this beyond doubt, because the moratorium policy prevented us from even attempting this on an experimental single property basis.

The best I could do was to use a careful analysis of peer reviewed literature on reproductive rates and life expectancy (fecundity) of Prairie Dogs to simulate mathematically what populations would be with and without the moratorium period. Effectively, those graphs demonstrated an intolerable logarithmic growth (annual doubling) without any control; with lethal control and the moratorium in place, the numbers could be held roughly constant or maybe slightly reduced on an annualized basis, due to the new generation of pups that were left to mature resulting in an endless and futile cycle of partial control. If the moratorium was removed, as is now proposed by staff, the simulation showed that the population in a given area would be quickly and efficiently reduced to a level that further cycles of lethal control would be unnecessary for several years barring extensive migration.

I have attended many PD Stakeholders meetings in the past in person and understand that emotions run deep on this issue. I have personally been likened to a Nazi death camp commander and some not-so-subtle verbal threats of "how you would like it if we came to your home and gassed your family".

I also attended the most recent PD Stakeholders meeting virtually, and once again, I heard a preponderance of comments from the neighbors of Open Space properties that were simply fit to be tied over the inability of the County to control the problem on Open Space leaving their personal property subject to great harm. I also heard the same faithful tenant stewards of Open Space crop and range lands attest to the insanity that results from the moratorium resulting in the problem not really being controlled. These comments were freely made in the face of threats and the prior destruction of County equipment by those few folks adamantly opposed to any lethal control what-so-ever. I am sure these types of threats and actions make many good folks wary of commenting at all. But I am quite confident that the preponderance of stakeholders wants better results than what is currently happening.

With these thoughts in mind, I strongly urge the BOCO Parks & Open Space Advisory Council and the BOCO commissioners to do what is right and remove the moratorium language from the Cropland Policy per the staff recommendations.

Doing so will accomplish the following: 1.) First and foremost, it will reduce the total number of animals that are subjected to humane lethal control over the long run. 2.) It will free the county staff to concentrate more effort on dusting to control salivatic plague bearing fleas in Multiple Objective Areas (MOA's) or Habitat Conservation Areas (HCA's) where PD's a can be tolerated or encouraged to occupy. 3.) Over time, it will reduce complaints of tenants and neighbors to Open Space properties. 4.) Over time, it will preserve the soil health and productivity, which without adequate control can be severely impacted when populations exponentially increase to the point the landscape becomes totally barren and subjected to wind and water erosion. 5.) It is sound fiscal policy to remove the moratorium period. The current program is a significant cost to the taxpayers of BC, but as currently limited by the moratorium as shown by carefully recorded numbers it is historically seemingly incapable of actually addressing the problem beyond maybe holding the status quo of endless control with minimal results.

Sincerely,

Dr. Blake Cooper, Former Ag Resource Div. Manager

## **Daniel Fentress**

**Comment #33**

*Longmont*

Jan 10, 2022

As a third generation landowner and farmer in Boulder County, I am concerned about agricultural land sustainability for future generations. I support staff's proposed changes to prairie dog management to remove the moratorium and allow prairie dog control all year long.

## **Marianne Giesler**

**Comment #32**

*Larkspur*

Jan 09, 2022

Why is Boulder County so bent on destruction? Haven't you had enough lately? Destroying prairie lands by cruelly annihilating native species SHOULD be beneath you.

**Ruby Bowman****Comment #31***Longmont*

Jan 09, 2022

See attached pdf for my comments.

[Download Attachment](#)**William Vandever****Comment #30***Boulder*

Jan 09, 2022

I support the proposed change to eliminate the moratorium. Prairie Doge have done extensive damage to the Teller Farm area and made it very difficult for the farmer to cultivate several fields.

**marianne martin****Comment #29***Boulder*

Jan 09, 2022

Please do all you can to get the exploding prairie dog population under control. Allow year round culling, and add anything you can to stop these animals from ruining our beautiful grasslands.

Thank you so much

Warmly,

Marianne

**Christine Pacocha****Comment #28***Longmont*

Jan 09, 2022

Dear Boulder County officials/staff and Parks and Open Space staff-

I am writing to express my desire that the March 1st - May 31st lethal control moratorium be removed, enabling staff to better control the current out of control prairie dog population.

I have lived in Boulder County for 15 years and have been voicing my concerns to the County and the City that better prairie dog control is critical. I am an animal owner and lover and property owner who has been very negatively impacted by this species as have many others.

Please delete the moratorium, and allow year round lethal prairie dog management.

Thank you.

Sincerely, Christine Pacocha

**David and Teresa Elliott****Comment #27***Boulder*

Jan 09, 2022

We are in favor of the moratorium proposed change. It simply doesn't make any sense to protect any of the colony during certain times and allow expansion (pups) when the focus is trying to control the prairie dogs. Why would you allow the prairie dogs to populate when we are trying to control the population, both the adults and young? As neighbors to Open Space we see the destruction of the fields and property that are ruined by the prairie dogs. When they migrate they travel to our pastures and fields and this makes Open Space a very poor neighbor.

## Raymond Bridge

Comment #26

*Boulder*

Jan 08, 2022

We strongly support the change to the County's prairie dog management policies eliminating the springtime moratorium on lethal control of prairie dogs on agricultural properties. While well-intentioned, this moratorium has not worked well. By trying to avoid lethal control during the period when pups are born and raised during their early life, we have allowed populations to grow rapidly, so that in the end more prairie dogs are killed. This is not humane, not cost-effective, and causes problems, rather than solving them

## Beth Potter

Comment #25

*Longmont*

Jan 08, 2022

Hello!

I'm writing to support an end to the spring-time moratorium on lethal control of prairie dogs on county agricultural lands zoned as No Prairie Dog Zones. In addition, I would like to see the county increase its budget for prairie dog control.

There are not enough predators for the prairie dogs for the Boulder County ecosystem to be in balance by itself, and the imbalance has created arid lands that are not going to be easy to rejuvenate.

Colorado's already fragile ecosystem and overall lack of water for the number of living beings in the state is very tough to keep healthy overall. Healthy soils and grasses create more areas of carbon sequestration, which is important as one aspect to help combat climate change.

Thanks very much for considering this matter.

Sincerely,

Beth Potter

5050 Niwot Road

## Jan Kirkpatrick

Comment #24

*Boulder*

Jan 08, 2022

I support removing the moratorium on the spring time on lethal control of prairie dogs.

Prairie dogs maybe a keystone species but they have no balancing predatory species and damage crop and pasture land.

## Cari Cook

**Comment #23***Longmont*

Jan 08, 2022

I totally support the removal of this moratorium. If the end result is to eradicate the prairie dogs from a parcel of land why would one wait until after the pupping season?

Thank you for considering this. I have seen the damage done by prairie dogs to neighbors properties which cost them thousands of dollars. Its clearly obvious that farmlands and these critters cannot coexist.

## L Buckley

**Comment #22***Boulder*

Jan 08, 2022

Support for Change to Lethal Control Moratorium:

The Prairie Dog Management Plan, with its elements of tracking, relocation, lethal control, burrow disturbance and restoration is a well-thought out and multi-tact approach to prairie dog control in order to keep our agricultural lands and open space healthy. In order to continue the experiment in prairie dog control, please end the lethal control moratorium. Exterminating on the one hand and encouraging proliferation on the other are counter productive.

Thank you for your good work.

## Eric Skokan

**Comment #21***Longmont*

Jan 08, 2022

Based on our experiences in the field we are very clear that the ban on PD control during the spring needs to be removed. The spring control ban allows for a new generation of pups to swell the population making PD control nearly impossible. It is a modern day Sisyphian tragedy.

Remove the ban and the control will be much more effective saving resources. Those resources are better spent on a permanent management system that allows for the longterm, sustainable success of prairie dogs in large dedicated areas.

We'll never arrive at a win-win place if we spend eternity pushing the same boulder up the same hill.

## Suzanne Webel

**Comment #20***Longmont*

Jan 07, 2022

I support the proposed changes to the Prairie Dog Habitat Element of the Grassland and Shrubland Management Policy, to allow prairie dog control year-round. My farm is bordered on one long side by a prairie dog infested property owned by OSMP, and we are roughly across the street from a large assemblage of properties owned by BCPOS where staff has valiantly tried to manage its prairie dogs for several years. If left unchecked, prairie dogs lay waste to valuable but vulnerable agricultural farms, resulting in a devastating loss of topsoil, reduction of forage for livestock, and invasion by noxious weeds. County staff will lose the battle every time -- wasting time, money, and prairie dog lives -- unless

the policy is changed to lift the moratorium and allow management year-round. The City's inability/unwillingness to manage their prairie dogs costs me thousands of dollars every year; please enable BCPOS to be a better neighbor to us all. Thank you.

## Tamara Sneddon

Comment #19

*Longmont*

Jan 07, 2022

I strongly agree with removing the moratorium for Prairie Dog control for several months which will provide more efficiency and ultimately less prairie dogs that need to be controlled. It doesn't make any sense to wait until the population potentially triples or quadruples because of the birth of more animals this coming Spring.

## Maria Wasson

Comment #18

*Longmont*

Jan 06, 2022

We support the removal of the moratorium for lethal control of prairie dogs in designated areas. Waiting to kill more after whelping makes no sense, is more costly and ultimately does not make progress to restore the land for agricultural purposes.

No one wants to kill them, but everyone needs to find a balance between the rural and urban lifestyles. Compromise is never fully satisfying for everyone but it is a way forward.

The attempt to be a good steward for the land and wildlife is a challenge. The previous plan has failed and has been costly. It is time to move on.

Isn't the definition of insanity to keep doing the same thing over and over that doesn't work?

Removal of the moratorium makes sense.

Getting the land restored is a step in the right direction.

## Joel Schaap

Comment #17

*Longmont*

Jan 06, 2022

Boulder County Open Space has a very clear and well defined land use program that determines where they want and don't want prairie dogs. I support staff's recommendation to remove the moratorium to make achieving their goals more efficient and cost effective.

## Bill Stonehocker

Comment #16

*Longmont*

Jan 05, 2022

I fully support removing the seasonal moratorium on lethal control of PD's on NPD properties of BCPOS. Our farm borders one of these properties and every year in the spring and summer I am forced to deal with the migration of PD's from BCPOS into my irrigated hay fields and pastures. It makes absolutely no

sense to handicap control efforts when it is so difficult to manage PD occupation of NPD lands. Not only does it cost more money and time, in the end, it also costs more PD lives. I certainly do not enjoy the responsibility of lethal control from boulder county prairie dogs moving onto our property every year.

## Melanie Loch

Comment #15

*Longmont*

Jan 05, 2022

We support the BCPOS recommendation to remove the moratorium for lethal control of prairie dogs between March and May. As caretakers of a Boulder County Ag Easement, we care deeply about the biodiversity objectives in Boulder County. We also take our mandate to conduct agriculture on our land seriously.

In 2014, the year we moved here, we met with the county to advise us on how to re-establish farming after decades of neglect and a resultant overpopulation of prairie dogs. Our lot consisted almost entirely of weeds—curlydock, kochia, thistle, bindweed—denuded areas, and prairie dog holes. In the absence of plague, the County advised us to do three things in this order: first, get rid of the prairie dogs, attend to the weeds, and only then begin soil mitigation practices, which can take years to heal the land.

We have yet to get past the first stage, even as the Ag Agreement MANDATES that we farm it or pay exorbitant tax penalties. These Ag agreements were put in place, presumably because our local community values local agriculture. In the seven years since we situated ourselves in this no prairie dog area, aside from a small patch of grass the land remains unsuitable for any farming, and we are witnessing the adjacent BCPOS lands degrade over time.

We are sandwiched between BCPOS land and two NUPUDS of residential properties. When the prairie dogs relocate to our treated property from BCPOS lands, and enter our neighbors' yards, it places us at odds with these neighbors, as villains in the process, even though the situation is beyond our control.

Despite annual treatments, the number of 'our' holes has grown from 1,700 to approximately 2,400+ currently. For perspective, that density would be like asking 80 prairie dog coalitionists to adopt and support 30 holes on each of their one half-acre residential properties (where they also do not belong). Of course, no one would want to be forced to deal with this Catch-22, as conservationists who outnumber us continuously pressure the county to make farmers accept and finance this untenable situation. Yet that is what our own neighbors are concerned will happen as this continues to go unaddressed. And as prairie dogs cross into their yards, it is us, and not the county, they expect should solve the problem. Clearly we can neither deliver on their expectations nor the county's farming expectations if the county fails to do their part.

We have worked consistently with the County, but because of the arcane moratorium, we cannot gain any traction in clearing our land, because the county cannot clear theirs, as we helplessly watch the endless annual cycles of dogs redoubling after pups are born, then treating them afterward, like digging a hole and filling it up again only to dig it up to fill it up....

We are personally placed in the awful position to be the grim reaper every year, at a cost so far, of



thousands of dollars with no commensurate revenue. Prairie dog farming does not qualify for Ag agreements. And it pains us to slaughter. On land that the County has deemed unsuitable to support them—prairie dogs are dying needlessly. And needless deaths is a point on which we agree with the Prairie Dog Coalition.

We have waited for seven years to get started farming our land and we face another cycle. Local long-standing farmers consider quitting because the prairie dog devastation reduces output and increases costs while they compete in the marketplace with mega-farmers. If Boulder County really values local agriculture—which historically has been difficult in this arid climate even without the challenge that prairie dogs place on it—we need a more focused approach to preserving the lands to keep it. That means supporting our farmers by holding stronger PD designation boundaries alongside efforts to nurture our endangered prairie dogs. Respectfully, the moratorium prevents this from happening.

## Ronald Robl

**Comment #14**

*Longmont*

Jan 04, 2022

I support allowing lethal control of prairie dogs on county open space Mar 1 - May 31.

## Elizabeth Black

**Comment #13**

*Boulder*

Dec 31, 2021

Thank you for considering getting rid of the lethal control moratorium. I support this change. I don't like killing things any more than the next person does. However, keeping the moratorium in place as written simply means that more prairie dogs will be killed in the long run. It's a simple matter of math. If you stop killing prairie dogs during pupping season, then more prairie dogs will survive to breed, and they will make even more prairie dogs. This means you will end up having to kill exponentially more prairie dogs to clear the NPD's. It just doesn't make any sense to stop lethal control in the spring time, so that you will have even more prairie dogs to kill in the future. You want to minimize lethal control, and getting rid of the moratorium is the way to minimize the numbers of prairie dogs you will have to exterminate in the long run. Thanks very much for tackling this contentious issue. Elizabeth Black

## Linda Parks

**Comment #12**

*Boulder*

Dec 20, 2021

The Boulder County Horse Association supports the removal of the seasonal moratorium for lethal control of PD's on our agricultural lands. We believe land managers need to have access for the full 12 months of the year in order to stay on track with the removal.

One step forward and three steps back is not working with the current practices, and adjoining private properties to county-owned agricultural lands are struggling to keep PDs from moving onto their lands.

Boulder County agricultural lands (and heritage) should be preserved for healthy pasture grazing, hay production, crops, and the preservation of our soils.

## Paula Shuler

Comment #11

*Longmont*

Dec 20, 2021

I fully support BCPOS staff's recommendation to remove the moratorium period for lethal control of prairie dogs on NPDs. Why would Boulder County want the prairie dog population to increase for three months when the management objective on these parcels is No Prairie Dogs? It makes sense to remove the moratorium, less prairie dogs will need to be controlled and it will allow each of us to manage more efficiently and meet our irrigated land objectives. I farm private property that experiences unwanted prairie dog occupation from prairie dogs moving from contiguous OSMP and BCPOS irrigated agricultural parcels. It costs us quite a bit of money and time to keep unwanted prairie dogs off of our land and our hay fields. None of our neighbors want prairie dogs or want to have to control them. Removing the moratorium will help make Boulder County a better neighbor and land manager.

## Chris Brown

Comment #10

*Boulder*

Dec 19, 2021

I support your need to end the moratorium of lethal control during pupping season. Otherwise all your efforts will just be like pissing in the wind– wasted.

## Shari Depauw

Comment #9

*Boulder*

Dec 17, 2021

This is an incredibly inhumane idea. During rearing season?!? Killing pups?!? I don't believe Boulder has degraded to this. Do the right thing and stop selling out to ranchers.

## Amber Goss

Comment #8

*Boulder*

Dec 17, 2021

This is why I don't eat local produce unless it's organic. Ultimately, the poison used to kill prairie dogs ends up in food. Farmers have to wait 7 years after exterminating prairie dogs before they can use the organic label.

## David Asbury

Comment #7

*Longmont*

Dec 17, 2021

Please see our attached letter.

[Download Attachment](#)

**Laura Bruess****Comment #6***Boulder*

Dec 16, 2021

I am against lifting the moratorium. We killed at least 29,678 prairie dogs last year. Now we want to kill even more, year round. Where is our compassion?

**April Lyons****Comment #5***Boulder*

Dec 15, 2021

Who are we to make this kind of lethal decision when this land was stolen from the prairie dogs and from the Hinóno'éeí (Arapaho) and Cheyenne nations. Let's keep in mind that any decision Boulder County makes is an illegal decision because they were illegally elected after the 1851 Treaty of Fort Laramie was broken. Boulder has disrespected this land ever since (and before) the Sand Creek Massacre where Boulder residents trained to carry out such a horrific act right here at Fort Chambers between Valmont and Jay. This proposal is asking to kill baby prairie dogs that have somewhat been protected. This is so cruel, but not surprising.

**Debra Welsh****Comment #4***Boulder*

Dec 15, 2021

I continue to be against Boulder's killing of prairie dogs under all circumstances and for all reasons, except when they are infected with the plague or other serious contagious disease. I do not approve of lifting the moratorium on spring killing and I would wish you would permanently ban all lethal action!

**Sandra Hale****Comment #3***Boulder*

Dec 15, 2021

I urge relocation of prairie dog populations where necessary.  
I am against lethal extermination of prairie dogs in their natural habitat.

**Dana Bove****Comment #2***Boulder*

Dec 15, 2021

To staff and specifically to Jeff Moline in regard to his response to my questions last night:

The PD management plan and written element is designed to be adaptive. My interpretation of Jeff's response to my questions last night, was that he and apparently BCPOS feel it is unreasonable that FRNBES request that management policy within the general 1/2 mile buffer of eagle nests at properties like Braly, Holmberg, and Rabbit Mtn be locally adaptive and restrictive in terms of tenants or BCPOS staff being allowed to remove substantial amounts of prey source from these areas. Protect species of

special concern is the guiding principle and it is headlined in the County's foundational plans and documents.

I interpreted Jeff's response last night as dismissive of our suggestions and it sounded taht he felt they were without merit. Thus, my take away was how could we ever expect such locally adaptive responses from an agency that only employed 150 staff etc? Yet, when landowners such as last night express concerns over their welfare--as opposed to the well-being of multiple species of special concern dealing with potentially significant prey reduction--I didn't hear you or other staff dismissing those concerns, or suggesting it was unreasonable to ask for protections of their property. Yet, actually responding to their encroachment concerns, as expressed by landowners, does sound a whole other issue.

Which brings me to another promise that was not kept by BCPOS--being interactive and collaborative with stakeholders and experts in the field regarding plans to manage PD's and Grasslands at Holmberg. I appreciate Susan's honesty about not having the time to take that on due to the speed at which things were happening, but is something at least FRNBES wants to be informed about and be able to offer some of what we have learned that would be of value. From the Holmberg planning, I know many other expected that as well.

Dana Bove

## **Laura Portis**

**Comment #1**

*Boulder*

Dec 15, 2021

I support the non renewal of the moratorium restricting lethal control. I agree with many stakeholders that the issue is getting worse. I believe it's important to preserve agriculture and wild vegetation in Boulder County. Thank you.