

**Recommendations for a Reduced Project Area and Decreased Lethal Control in  
OSMP's Expedited Plan for Prairie Dogs on Irrigated Agricultural Lands**  
*Keep Boulder Wild, August 29, 2020*

Dear Council,

Thank you for your attention to this very important matter. This matter is one of the issues that draws much public input and speaks to the values of our community. Our community values wildlife, conservation, being progressive and humane.

- Of the 525 total emails received by Council regarding prairie dogs and OSMP plan:
  - **403 were in favor of the Keep Boulder Wild recommendations** for prairie dog management, with 153 from our local Boulder supporters including agriculture stakeholders; the remaining 250 from concerned citizens who either live in Boulder or whose residency was unknown.
  - The remaining 122 emails were in support of the OSMP Preferred alternative/lethal control.
- During the public comment portion of the meeting,
  - **43 people signed spoke in favor of non-lethal prairie dog management** or Keep Boulder Wild's recommendations
  - 20 speakers were in favor of lethal management.

Since the public hearing component of this plan took place on Aug. 11, KBW has realized that the approach we took to create our recommendations to amend the Expedited Plan was one of conservation conflict transformation. **We did not write the recommendations as a prairie dog advocate would like to see; rather, we offered amendments that took ALL stakeholder's requests into the plan. We respectfully request Council to consider that on Tuesday.** It has also become clear that stakeholders on all sides of the issue have many shared values and it is our belief that much progress could come out of continued stakeholder engagement that is meaningful and inclusive of locals who are solution oriented.

It is clear that lethal wildlife management, no matter the species and including prairie dogs, is becoming less and less favorable to the general public. Indeed, recent work published from Colorado State University's Tara Teel & Paul Manfredo documents a growing shift in values towards mutualism (Manfredo & Teel, 2017, America's Wildlife Values). The long-term benefits of developing and implementing non-lethal options in alignment with our community's values seem to far outweigh convenience and expediency of extermination for short-term gains.

We support and appreciate the OSMP staff and believe the below recommendations represent a balanced take on the plan and ask Council to pass a motion to include the below amendments in the plan:

1. **Reduce the 967-acre Project Area to 406 acres** by removing

- a) properties where agricultural uses can co-exist with prairie dogs,
- b) OSMP-designated Prairie Dog Conservation Areas, and
- c) OSMP-designated Grassland Preserves.

The Reduced Project Area would include all properties experiencing significant conflicts with prairie dogs within the designated Removal and Transitions Areas.

2. **Prior to implementation of any lethal control on properties within the Reduced Project Area, perform an analysis on each property, with knowledgeable stakeholders (see #3),**
  - a) to determine best management practices including a real analysis of where lethal makes sense and where non-lethal approaches would be more effective; and
  - b) to collect baseline data on each parcel for research on soil health, co-existence strategies, and carbon sequestration.

The stakeholders could then create a **community-based shared learning process** consisting of, agricultural entities, coexistence strategists, prairie dog experts, soil health and climate change experts and staff to participate in the parcel by parcel analysis to measure and study solutions and results on soil health. We ask Council to support or direct staff to participate in this effort.

3. **Ask the City Manager to authorize a Special Use Permit for use only on the properties within the 2021 and 2022 prioritized removal and transition areas that have been identified for lethal control through a parcel-by-parcel analysis** with staff and stakeholders (see #2).

Apply for a second permit in early 2023, only if it has been determined necessary after the Plan is reviewed by staff and stakeholders.

4. **Work with other entities including the state office to consider outside funding and resources to increase annual relocations and coexistence techniques if they become available.**
5. **Release relocated prairie dogs to the city's Southern Grasslands** where there is historic unoccupied habitat, a larger landscape, only 3% occupancy and a Prairie Dog Working Group goal to create sustainable prairie dog populations alongside our Boulder County & USFWS neighbors.

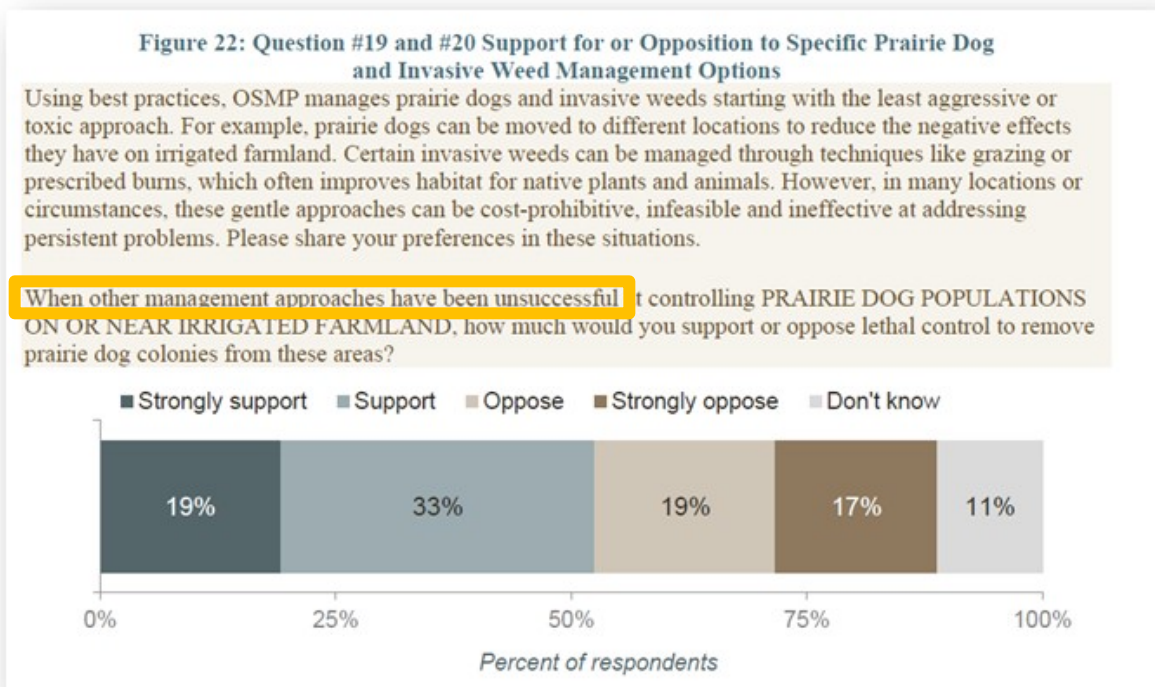
Very relevant to this decision on Tuesday, is Figure 22, Question 19 & 20 from a 2019 OSMP survey. The question clearly asks residents if they would support lethal after other management approaches have been tried and found unsuccessful. Other management approaches including those made by the Prairie Dog Working Group exist but have not yet been implemented because the Expedited Plan put them aside. As

such, the public's response to this survey question does not translate into community support for lethal methods in our opinion.

These are some of the management approaches that have yet to be implemented:

1. Installation of buffer zones
2. Barrier installation when appropriate on adjacent agricultural property & private land borders
3. Increase relocations (with additional outside support)
4. Increase passive relocation
5. Research & implement coexistence measures
6. Pilot alternative leases with lessees and conservation groups
7. Support for lessees providing significant wildlife habitat, for example, Boulder Valley Ranch, to participate in voluntary conservation incentives

Until some or all of these approaches have been implemented or proved unsuccessful, we do not believe the City is justified in saying that the responses on the slide below reflect the community's support for lethal management.



Thank you very much for your attention to your constituent's input.

Sincerely,

Thank you,

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