

Prairie Dog Working Group Comments on Recommendations
May 8, 2017

One-time emergency application of Delta Dust at the Armory site:

- The site receiving prairie dogs from the Armory, correct?
- This should say “at the *Damyantovitch* site” (not the Armory site) with the understanding that this does not limit additional applications in 2018, and that 2018 recommendations include continuation of Delta Dust in 2018 and beyond.
- *It focuses on long-term survival of colonies:* We must survey sites and/or take measures to avoid impacts on sensitive insects (butterflies, skippers, and beetles) that could occur on this site.
- *It encompasses broad City of Boulder values:* There must be considerable up-front communication.

Leave the prairie dogs at Foothills Community Park

- ...and install barriers to restrict the prairie dogs and decrease conflicts.

Prepare and submit to CPW and USDA a proposal for plague management for the use of sylvatic plague vaccine and Delta Dust in a focused way for 2017/2018 as part of a larger study to be completed later:

- This must include other elements, such as monitoring effects on non-target insects and conducting social science research on community perceptions and viewpoints.
- The proposal should be submitted as soon as possible for the Southern Grassland Habitat Conservation Area (SCHCA). There needs to be a larger area for the proposal to be approved.

One-time application of Delta Dust in all receiving burrows for 2017 applications

- The term “one-time application” implies that this is the only time this application will be done. We need assurance in the ‘2018 and beyond’ recommendations that application will continue in 2018 and beyond.
- *It protects biodiversity and the overall health of the natural ecosystem:* Precautions for sensitive insects must be taken.
- *It uses effective plague mitigation methods:* Systematic surveys for sensitive insects should be required first.
- *It focuses on long-term survival of colonies:* We must survey sites and/or take measures to avoid impact on sensitive insects that could occur at this site.
- *It encompasses broad City of Boulder values:* There must be considerable up-front communication
- *It allows for flexibility:* There must be public education, research, and adaptive management.

Identify a list of preferred prairie dog contractors:

- ...who meet the criteria developed in recommendation #3.

Provide incentives for private landowners to offer their land as receiving sites:

- ...given specific criteria for inclusion, so that they contribute to a larger contiguous grassland habitat area.

Create a conservation/mitigation fund to be used for acquisition of land for prairie dogs:

- Contiguous, healthy grassland that, in aggregate, could support sustainable prairie dog colonies, NOT simply 'land for prairie dogs' which could include small sites with neighbor conflicts built in.
- The mitigation fund should not just be used to acquire land for prairie dogs. There are many other non-lethal activities and management that the conservation/mitigation fund could support.
- This should be: "create a conservation/mitigation fund to be used for prairie dog conservation, including acquisition of land for prairie dogs."

Evaluate sites that have had plague in the past, identify open burrows that could be used in the future, and act to keep burrows open:

- ...if they occur within large contiguous portions of the southern grassland.

Establish practices that encourage City staff to trust and implement the advice of prairie dog conservation experts:

- Staff should not only establish practices, but should also follow the practices.

Create a process for stopping suspicious activity during the intervening period when City staff has not determined issues of legality:

- New wording: "determine the chain of command and establish protocols to enforce the cessation of suspicious activity when it appears that the City's ordinance to protect prairie dogs is being violated."

Ensure that receiving site criteria includes a requirement to provide adequate accommodation for the number of prairie dogs that will be moved to the site:

- ...using existing burrows and nest boxes, with type/number of nest boxes determined by the Prairie Dog Coalition (PDC).

Review the Administrative Rule for the Relocation of Prairie Dogs to see what could be transferred to future recommendations:

- The specific sections of the Administrative Rule that need to be reviewed are the timeline for plague management post-relocation and the timeline that outlines when prairie dogs are allowed to be relocated.
- Who is reviewing the Administrative Rule and is it currently in effect? If so, how long will it remain in effect? The City must issue a report summarizing the status of the Administrative Rule.
- Both staff and the Working Group should do this task.

Create a relocation policy that prioritizes colonies that are in imminent threat of lethal control, regardless of land ownership:

- This may already be outlined in the Administrative Rule. It is worth reviewing to clarify.

For the relocations, prior to applying an insecticide that may impact bees, check the Field Watch registry and provide 72-hour notice to any hive managers within six miles:

- As noted elsewhere, mitigation measures must be taken to protect rare insects (butterflies, skippers, moths, beetles KNOWN to occur in certain portions of Open Space Mountain Parks grasslands).

Create and update annually (based upon current information) detailed, minimum requirements for contractors to follow in the RFP on how the animals are being treated and the relocation performed:

- This is not needed if a list of legitimate relocators is used annually.

For 2017 relocations using existing burrow systems at the approved release sites; when those are all utilized, install type/number of nest boxes determined to be appropriate per recommendation of the Prairie Dog Coalition (PDC):

- The PDC does not want to or have the capacity to recommend adequate burrows on all of Boulder's relocations. The PDC could provide a simple criteria for receiving burrows, but this is an evolving process and may have to be revised after new techniques are utilized.

ADD: Create a subgroup of the Prairie Dog Working Group to look at some of the more complicated recommendations of '2017' and '2018 and Beyond' that need more work. The subgroup would:

- Outline a comprehensive plague management plan for 2018 and beyond
- Identify criteria for selecting relocation contractors and come up with a list of preferred contractors who meet these criteria.
- Define 'successful relocation.'
- Create guidelines and criteria for prioritizing relocation sites.
- Review the Administrative Rule for the Relocation of Prairie Dogs.
- Create criteria for the identification and prioritization of removal areas.
- Revisit the occupancy rate and/or consider other methods of determining desired occupancy.
- Look at ways to increase the number of receiving sites.

ADD: Establish protocols for allowing private landowners to present their concerns about prairie dogs to City Council without requiring the completion of a kill permit application.