



Open Space and Mountain Parks Department
City of Boulder, Colorado

P.O. Box 791 Boulder, Colorado 80306
303-441-3440

January 4, 2010

Dear Grassland Plan Mailing List Member:

The Open Space and Mountain Parks department appreciates your past participation in the development of the Grassland Plan. I am writing to inform you about two changes that staff is proposing to make to the plan before it is presented to City Council in February. Staff will be presenting these changes to Open Space Board of Trustees' (OSBT) for their consideration on January 13, 2010.

The first recommendation is to change the designation of two prairie dog colonies west of Foothills Park from "Transition Areas" to "Removal Areas". This change is being recommended to make the Grassland Plan consistent with the council-approved Urban Wildlife Management Plan (UWMP). Staff is also recommending that the OSBT approve a change to the prairie dog relocation criteria that would allow staff to consider prairie dog relocation onto OSMP lands after **one year** of plague-free conditions on city OSMP lands. The draft plan currently requires two years of plague-free conditions on OSMP prior to considering relocation onto OSMP.

The Open Space Board of Trustees approved the draft Grassland Plan in August 2009. Since then has been working to present the plan to City Council for their acceptance. OSMP staff will present the Grassland Plan as part of a City Council study session on February 23, 2010. In preparation for this study session, conversations about the interaction of the Grassland Plan and the UWMP revealed the need to improve plan coordination by making the previously described management designation changes. Details about these changes are attached and will be available on the Grassland Plan webpage www.grasslandplan.net (note new address).

OSMP will be hosting an Open House on Monday January 11, 2009 to discuss and gather feedback on these changes. The Open House will be held at OSMP's Cherryvale offices (66 South Cherryvale Road Boulder 80303) from 6:30 to 7:30 pm. You can also email your comments to me directly at gershmanm@bouldercolorado.gov, or fax comments to 720-564-2095. Comments received by 5 pm on Tuesday January 12 will be provided to the OSBT at their January 13 meeting.

The January 13 OSBT meeting is open to the public. There will be a public hearing on the proposed changes to the draft Grassland Plan.

Feel free to contact me for more information.

Sincerely,

Mark Gershman
Environmental Planning Supervisor
Grassland Plan Project Manager
720-564-2046 gershmanm@bouldercolorado.gov

PROPOSED DRAFT GRASSLAND PLAN CHANGES

January 4, 2010

Staff is proposing that the Open Space Board of Trustees move to **change the designation** of the prairie dog colonies on the ERNI and Mary Moore properties from “transition area” to “removal” area

Staff is also proposing that the OSBT move to **change relocation criterion #3** for Prairie Dog Conservation Areas or Grasslands preserves to read: “At least one year has passed since presence of active plague on OSMP system or bordering properties and proper flea dusting has been conducted in the burrows slated for introduction and a surrounding buffer area as designated by health officials.” The draft plan approved by the Open Space Board of Trustees included an option of waiting two years without burrow dusting.

Prairie Dog Management Designation Changes

The proposed designation changes affect a total of 29 acres of occupied prairie dog habitat west of the Foothills Park site. Attachment A is a map showing the location of these two properties and the most recently mapped extent of prairie dogs. These areas were designated as “near term removal” sites in the Urban Wildlife Management Plan (2006) and removal areas in the Open Space Prairie Dog Habitat Conservation Plan (1996). The major factor affecting designation was incompatibility with the operation of the proposed (now partially developed) Foothills Park. Past public opposition to plans by Parks and Recreation to construct a barrier separating the park site from nearby prairie dogs colonies and questions about effectiveness of such a barrier also contributed to the designation of all surrounding lands as a “near term removal area” in the UWMP. While the Grassland Plan is consistent with the UWMP in that it allows for removal of prairie dogs from these areas,—the transition area designation relies upon relocation for removal of prairie dogs and therefore the availability of relocation sites. The UWMP calls for near-term removal, and although relocation is the preferred alternative, allows for lethal control as well. In order to have the Grassland Plan designation allow for lethal control, the designation needs to be changed to “removal area”. Attachment B provides descriptions of the various management area designations from the OSBT-approved draft Grassland Plan.

The Grassland Plan includes a process by which lands occupied by prairie dogs can be designated into one of five management categories (*see box--below*). Staff developed this approach as an objective, criteria-based tool to integrate various types of ecological conservation, sustaining agricultural productivity, as well as seeking to address adjacent land uses. This tool was used uniformly to designate prairie dog management in the Grassland Plan and represents a significant step in the development of OSMP’s prairie dog conservation activities. At other sites, the designations resulting from the use of this tool have been consistent with the UWMP. The changes being recommended in this memo represent the need to make a single site-specific change because of the importance already assigned to the Foothills Park by City Council.

Prairie Dog Management Designations in the OSMP Grassland Plan

- Grassland Preserve
- Multiple Objective Area
- Prairie Dog Conservation Area
- Transition Area
- Removal Area

Changing the designation of these colonies may have implications for OSMP land management. Currently, the removal of prairie dogs from these properties is not a departmental priority. Several properties where agricultural uses have been eliminated or curtailed because of prairie dogs activities or where other sensitive ecological communities are threatened by prairie dog occupation have been identified as priorities for prairie dog removal. OSMP has approximately \$15,000 allocated in the 2010 budget. At this level of funding, staff was anticipating addressing small prairie dog populations where removal would leverage significant conservation benefit—in this case, returning lands to agricultural productivity.

The existing 2010 OSMP budget allocation is insufficient to fund removal of the current populations on these properties. If prairie dog removal from the Mary Moore and ERNI properties becomes a city, and therefore, departmental priority OSMP would need to find other sources of funding (i.e., partnerships with Parks and Recreation, re-allocation of 2010 funding from other priority projects, or supplemental appropriation to the 2010 budget).

Another implication could be the need for receiving sites in 2010. OSMP will not know about the extent of available receiving sites until late summer 2010. Staff also places a priority on using any city OSMP relocation sites for prairie dogs from city OSMP removal or transition areas and making city OSMP lands available to “non-OSMP” prairie dogs once staff has brought OSMP lands into compliance with the Grassland Plan designations.

Using OSMP lands as receiving sites for prairie dogs parks and recreation property will reduce the availability of prairie dog receiving sites for relocation needs from city OSMP removal and transition areas—delaying the implementation of the Grassland Plan.

Prairie Dog Relocation Criteria Change

Prairie dog relocation is a way to remove unwanted prairie dogs from a site. Relocation has significant implications for the receiving site. In addition to its benefit as an alternative to lethal control, the reintroduction of prairie dogs can create conditions that support other desirable species. Prairie dog relocation under the wrong conditions can have undesirable effects upon prairie dog survival, vegetation, wildlife habitat, agricultural activities, and soil conservation. In order to minimize adverse effects, OSMP staff developed a set of criteria to guide prairie dog relocation onto OSMP lands. Relocation criteria represent a series of conditions that must be met before OSMP-managed lands can receive black-tailed prairie dogs through active relocation. Attachment C includes the prairie dog relocation criteria from the OSBT-approved draft Grassland Plan.

The proposed modification of the prairie dog relocation criteria would apply to the 24,000 acres of the Grassland Planning Area. Staff’s original version of this relocation criterion was for

one-year, plague-free conditions on the OSMP system and bordering properties prior to considering relocation. The duration of plague-free conditions was increased to two years in response to public comment, a request from prairie dog advocates to consider plague a more serious threat, and a specific request to increase the duration of plague-free conditions by the Prairie Dog Coalition. Prairie dog advocates have subsequently indicated that they would prefer a shorter plague-free interval.

The existing criterion allows relocation after one year if burrows are dusted with insecticide (to kill plague carrying fleas). Removing the two-year plague free period from the criterion means that burrows must be as part of all prairie dog relocations. The Colorado Division of Wildlife frequently requires dusting as a condition of their prairie dog relocation permits. Consequently changing this criterion has little management or logistical impact.

Some community members raised concerns that even a one-year plague-free standard may make for long waiting periods for prairie dog receiving sites. The lack of receiving sites could result in greater use of lethal control.

The relocation criteria related to “time since plague” was intended to avoid plague mortality of relocated prairie dogs and minimize the chances of moving plague around the landscape artificially—thereby *decreasing* prairie dog mortality. Because plague is expressed seasonally—typically during warmer weather, a full year is needed to determine if plague is active or just seasonally dormant. OSMP staff maintains that a one-year plague free standard is needed to avoid mortality of prairie dogs already living on city OSMP lands.

There was also community concern that requiring the entire OSMP land system to be plague free was an unreasonable standard that could lead to greater use of lethal control because relocation sites would be unavailable.

Given the uncertainty in how plague spreads among prairie dogs, moves from place to place, and the unusual behavior of the current epizootic around Boulder, staff felt that predicting whether plague was present on either a receiving site or source site would be difficult while plague is active in the broader landscape. The return of plague to one an OSMP site suggests that passage of time since plague moved through a localized area such as a receiving site might not be a good predictor of the potential for plague to re-occur. However, the absence of plague on a larger landscape such as the OSMP land system seems to be a more reliable indicator of plague risk. In addition, the unpredictable spread of plague makes it difficult or impossible to assume that plague is not present in prairie dogs being captured at the removal area if plague is active somewhere nearby.

Dusting of animals with insecticide has been viewed in the past, as a reliable way to ensure that plague is not transported by the relocated animals. However, the recent evidence that some individual prairie dogs infected by plague live on for extended periods casts doubt on this assumption.

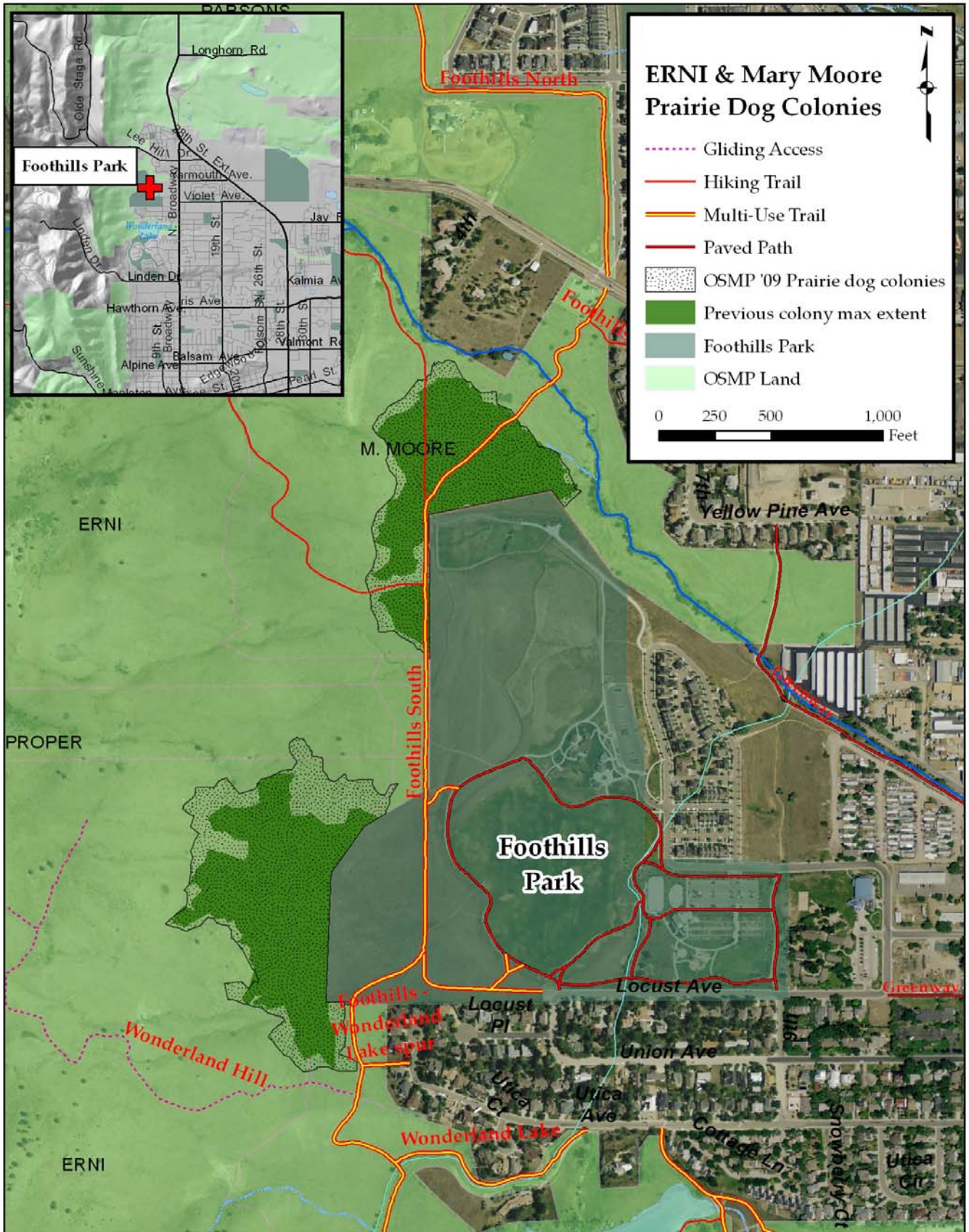
As a result, OSMP staff feels that the best way to ensure that prairie dogs moved to a receiving site did not succumb to plague present on the receiving site or transport plague to the receiving

site and nearby healthy colonies, was to wait until the entire OSMP land system appeared clear of plague.

The proposed changes the Grassland Plan have potential implications for conservation of OSMP lands and the implementation of the plan. There may be an expectation that changes resulting from the modification of the relocation criteria will result in greater availability or receiving sites from outside the city OSMP land system. Staff is concerned that it will be difficult to find suitable relocation sites for prairie dogs in priority removal and transition areas on city OSMP lands. Staff will need to carefully manage and track relocation opportunities over the next ten years. Doing this while simultaneously providing relocation opportunities for prairie dogs from off city OSMP lands will make it more difficult to achieve the conservation objectives in Grassland Plan and conserve the ecological and agricultural values of city OSMP grasslands during the 10-year planning horizon.

Developing policies and practices for prairie dog relocation onto city OSMP lands that are compatible with both the Urban Wildlife Management Plan and the conservation of OSMP grasslands is identified as an early implementation step in the Grassland Plan.

Attachment A
 Location map for ERNI and Mary Moore Properties/Prairie Dog Colonies



Attachment B

Descriptions of Prairie Dog Management Designations from the OSMP Grassland Plan

Grassland Preserves (GP)

Grassland Preserves are areas where prairie dogs and their associated species are part of large and ecologically diverse grassland habitat blocks. These areas are considered the best opportunity to conserve prairie dogs and their associated species. In most cases, prairie dogs will be allowed to persist without removal in Grassland Preserves. However, removal will be allowed for the purposes of maintaining existing irrigation facilities such as headgates, ditches, lateral ditches, reservoirs, and irrigated fields. In addition, to ensure protection of habitat within Grassland Preserves, the need for limited removal from a Grassland Preserve will be assessed if prairie dogs occupy more than 26% of the Grassland Preserve (i.e. viability drops below “Good”) and indicators of vegetation composition fall below thresholds identified in relocation criteria (*contained in Appendix I of the draft Grassland Plan*). Inactive, previously occupied colonies within Grassland Preserves could serve as relocation receiving sites (where there is an existing burrow infrastructure) and if the area meets relocation criteria (*contained in Appendix I of the draft Grassland Plan*). However, prairie dogs will not be relocated into irrigated fields nested within Grassland Preserves. Following a die-off or other disappearance of prairie dogs from an area, they could be excluded to allow for habitat restoration or to protect existing habitat restoration projects.

While Grassland Preserves contain significant extents of habitat suitable for prairie dogs, they also contain less suitable habitat as well (*illustrated in Figure 25 of the draft Grassland Plan*).

Multiple Objective Areas (MOA)

In Multiple Objective Areas, preservation of prairie dogs and their associated community is one of several management objectives. Prairie dogs will be allowed to persist without removal except for the purpose of maintaining existing irrigation facilities such as headgates, ditches, lateral ditches, reservoirs, or irrigated fields. MOAs will not be used as receiving sites for relocated prairie dogs. Exclusion of prairie dogs attempting to re-colonize an MOA could occur to allow habitat recovery.

Prairie Dog Conservation Areas (PCAs)

PCAs are areas where the conservation of the prairie dog is the primary management objective and are managed opportunistically for associated species. These areas would serve as receiving sites for relocation with the minimum requirements described in the relocation criteria. No removal of prairie dogs would occur in PCAs except for the purpose of maintaining an existing irrigation facility such as a headgate, ditch, lateral ditch, reservoir, or irrigated field. Prairie dogs will not be relocated into irrigated fields within PCAs.

Transition Areas

Transition Areas are grassland areas where the preservation of conservation targets other than the prairie dog and associated community takes precedence. Prairie dogs may inhabit transition areas, but will be relocated away from the property when feasible (i.e. relocation receiving site

available). Following relocation, die-off, or other natural events such as dispersal that leads to a reduction of the population and result in uninhabited areas, re-colonization could be prevented or discouraged using barriers, re-seeding, grading, burrow destruction, passive relocation, or other methods available to the department. After efforts are made to trap and relocate all remaining prairie dogs, removal through lethal control will be allowed in accordance with applicable regulations and policies, and if numbers do not exceed 20 individuals. Removal would be allowed at any time for maintenance of existing irrigation facilities such as a headgate, ditch, lateral ditch, reservoir, or irrigated field. Continued irrigation will also be allowed in irrigated fields regardless of prairie dog occupancy.

Removal Areas

In removal areas, prairie dogs are incompatible with OSMP management objectives. The designation of a property as a Removal Area provides the option to remove prairie dogs from the property in accordance with applicable regulations and policies. Following removal, efforts would occur to prevent re-colonization including restoration or irrigation of the property, destruction of burrow system, exclusion structures, etc. Continued irrigation will be allowed in irrigated fields regardless of prairie dog occupancy.

Attachment C
OSBT-Approved Grassland Plan Draft Prairie Dog Relocation Criteria
(From Appendix I of the Draft Grassland Plan)

Prairie Dog Conservation Area (Basic Criteria)

1. Existing burrow structure or evidence of previous occupation
2. Average prairie dog density below 15 animals/acre based on sampling plots
3. At least 2 years has passed since presence of active plague on OSMP system or bordering properties or;
At least 1 year has passed since presence of active plague on OSMP system or bordering properties and proper flea dusting has been conducted in the burrows slated for introduction and a surrounding buffer area as designated by health officials.
4. Relocation will follow regulations set out in City of Boulder's Wildlife Protection Ordinance and associated city policies
5. All appropriate state, federal permits obtained and conditions of permits followed

Grassland Preserves (Full Criteria)

1. Existing burrow structure or evidence of previous occupation
2. Average prairie dog density below 15 animals/acre based on sampling plots
3. At least 2 years has passed since presence of active plague on OSMP system or bordering properties or;
At least one year has passed since presence of active plague on OSMP system or bordering properties and proper flea dusting has been conducted in burrows slated for introduction and a surrounding buffer area as designated by health officials.
4. Relocation will follow regulations set out in City of Boulder's Wildlife Protection Ordinance and associated city policies
5. All appropriate state, federal permits obtained and conditions of permits followed
6. Grassland preserve is below 10% threshold occupancy- as identified in Grassland Ecosystem Management Plan Black-tailed Prairie Dog and Associates viability standards
7. Vegetation and habitat within receiving site meets the following minimum standards based upon data from at least three transects within **each** habitat type on the receiving site:
 - a. Average bare ground no more than 22% cover
 - b. Average native species richness at least 18 species (with exception of non-native grassland patches)
 - c. Average relative cover of perennial graminoid species at least 60%
 - d. Average sensitive/conservative species richness at least 4 species (with the exception of xeric tallgrass or non-native grassland patch types)
8. Majority of receiving site has been identified as exhibiting Good or Very Good Habitat Suitability in OSMP's prairie dog HSM. Relocation should begin in areas with highest suitability.