

**Carolyn Holmberg Preserve at Rock Creek Farm Management Plan • 2020 Update**  
**Compendium of Public Input received on draft plan from Oct 19 to Dec. 15, 2020**

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**Theo Kuhn • Denver**

12/13/2020 5:32:00 PM • comment # 79

Please see the attached petition.

222 individuals have signed on, including representatives signing on behalf of the following groups: Boulder County Audubon, Rocky Mountain Wild, Denver Audubon, Evergreen Audubon, Stand with Our St. Vrain, Broomfield Bird Club, Foothills Audubon, Lindsey Sterling-Krank for Prairie Protection Colorado, and the American Eagle Foundation.

The petition requests several modifications to the plan:

- Eliminate the plan for the railroad grade trail and parking lot at the south end of 104th street.
- Develop a site-specific management plan for Bald Eagles, Ferruginous Hawks, and other state species of special concern (as required by the Boulder County 2017 Cropland Policy).
- Commit to formally study the potential effects of the proposed prairie dog thinning plan on protected raptors.



#79

12.11.20\_petition\_for\_

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**Dana Bove • Boulder**

12/10/2020 11:40:00 AM • comment # 78

BCPOS Staff:

The staff memo to the BOCC's doesn't reflect any recency of public comments. it appears that the most recent discussion in memo if from the Zoom meeting on Nov. 27.

There is nothing about a signed petition that now includes 218 signatures including 11 organizations-- Boulder County Audubon; American Eagle Foundation; a number of other local Audubon groups etc-- that oppose the 104th Street parking lot; RR grade trail; and promise about informed plan on any PD removal.

There is not a mention of wintering ferruginous hawks that utilize the area, among nesting eagles and other raptors that will be impacted by the RR grade trail and parking lot.

There is the frankly false claim that a new trail--RR grade trail--is necessary to fulfill BVCP guidelines that call for regional trail connections. The regional connections are already in place, what BCPOS is advocating for is an unnecessary trail to cater to recreational pressure, while at the same time

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abandoning the mandate in County plans that require protection of species of special concern, in hope that busy BOCC will lump the RR grade trail as a necessary regional access route. That is misleading.

BCPOS admittedly has never mapped or studied available alternate nest trees in and adjacent to Holmberg. FRNBES has made that mapping available. There are essentially about 2 trees in the entire preserve that are suitable for and will be of interest to the eagles for nesting. The current nest tree--barely--and the big live cottonwood with the very dense canopy nearby. The crotch support of the current nest will maybe last a season.

The current nest could last a few years with a bit of "man made" support beneath the crotch. We are big believers in non-interference. However, the Stearns eagles have been interfered with for years by development. While BCPOS may not have the same affection for nesting bald eagles as we do, this pair is incredibly well loved, and they deserve our support after being messed with for so long now. After this season, a couple of strategic supports under the nest will keep them potentially productive without the issues of last season--possible for a number of years.

The idea that working on a nest platform or support is "dangerous" and thus not worth doing because of the is just unreasonable and unfounded. Walking on the Cradleboard trail is now probably more dangerous, with motorized bikes and the new COVID crowd wizzing by. Putting a support under that nest next season would be simple and I'd put the risk of walking on the current trail and getting knocked over by a bike as a much higher risk.

Thank you.  
Dana Bove

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**Pam Wanek & Lindsey Sterling Krank • Boulder**

12/9/2020 • comment # 77

Comments originally submitted by email to the BOCC on Dec. 7

Please find our comment letter to the Commissioners for the upcoming item on the agenda related to the Carolyn Holmberg preserve. Please note, it is our strong recommendation that the County keep prairie dogs and let them occur naturally where they are desired and manage for conflict prevention, coexistence and regenerative ag uses where they are not. This plan is largely based on 'thinning' prairie dogs as a management tool. Thinning prairie dogs does not work. They are a social, colonial species who would do anything to be together, pair up and live in groups- even on lower quality habitat. Ie: prairie dogs would rather be together on lower quality habitat then spread out over better quality habitat.



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**Carol Hindes • Boulder**

12/9/2020 • comment # 76

Comments originally submitted to BOCC by online form on Dec. 7

Please do not allow the proposed parking lot at the Carolyn Holmberg Preserve. It violates our comprehensive plan and state protections and is contrary to the direction we should be moving. We have to make a GENUINE effort to protect wildlife that is being squeezed out of our remaining fragmented habitat. PLEASE! Draw the line in the sand!

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**Theodore Kuhn • Denver**

12/7/2020 11:57:00 PM • comment # 75

With the County Commissioner's final review of the Draft Plan fast approaching, it unfortunately appears that consistent public pressure in favor of stronger wildlife protections have yielded few meaningful changes.

An area that needs serious reconsideration in particular is the draft plan's treatment of site-specific management plans for State Species of Special Concern, which are required by BCPOS Cropland Policy for mixed-use properties such as Carolyn Holmberg Preserve at Rock Creek Farm. Ferruginous hawks spend winters in the preserve and are a State Species of Special Concern, yet the draft plan makes no mention of a ferruginous hawk management plan.

The draft plan's version of a bald eagle management plan is vague and inadequate for dealing with the preserve's changing conditions. Increased trail use due to the coronavirus pandemic, plans to cull significant numbers of prairie dogs (an essential prey source) and to build near a bald eagle nest all pose potential conflicts with the eagles that have taken up residence in the preserve since the last management plan update. It is perplexing that the new management plan would not adopt robust proactive measures – with structured, regular updates – to adapt to these new circumstances. Please see our previous comments on the details of site-specific management plans for State Species of Special Concern.

The Parks and Open Space Advisory Committee (POSAC) passed the draft plan on the condition of certain language being adopted that would provide greater consideration for the preserve's predators, and yet this language remains absent from any public discussion of the draft plan by staff. POSAC passed the plan on November 19th with the requirement that the prairie dog management objective be amended to balance "prairie dog population, grassland health and predator populations." But in staff responses to public comment on December 5th, the prairie dog management objectives continued to be described as only balancing "the maintenance of the critical social structure of the prairie dogs" and "vegetation response to decreased densities."

To adhere to the requirements imposed by POSAC and countywide policy, it is essential that BCPOS staff explicitly and proactively address the needs of predators at Carolyn Holmberg Preserve in their prairie

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dog management and in all other relevant management areas. Predators such as the bald eagle are an essential piece of the preserve’s ecosystem and benefit all visitors who are fortunate enough to see them.

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**Dana Bove • Boulder**

12/7/2020 11:51:00 PM • comment # 74

Introduction – Protecting Wintering Ferruginous Hawks and Nesting Bald Eagles at Holmberg

The Stearns bald eagles and the wintering ferruginous hawks that share their territory both depend on habitat protection at the Carolyn Holmberg Preserve. The spatial association between the nesting bald eagles and wintering hawks at Holmberg – as well as other bald eagle nest territories in the northern Front Range (FRNBES unpub. data, 2020) – emphasizes a fundamental commonality of needs that include expansive open lands with an abundance of protected prey resources (largely prairie dogs), and safe buffers from human disturbance and development. The proposed Holmberg management plan, which includes a parking lot, a new trail (proposed Railroad Grade trail), and still undefined plans to remove prairie dog in the most utilized hunting are for both eagles and ferruginous hawks, will hurt both species by degrading habitat and resources that they both rely on.



#74

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**Ruby Bowman • Longmont**

12/7/2020 2:33:00 PM • comment # 73

RE: CAROLYN HOLMBERG PRESERVE DRAFT PLAN IS NOT READY FOR PRIME TIME.

Board of County Commissioners:

One wildlife management recommendation in the draft plan calls for thinning of prairie dog colonies. This method involves random removal of prairie dogs in order to reduce the population size of a colony, usually by trapping the animals and donating them to wildlife recovery facilities. It may not be a scientifically proven method.

At the 11/19/2020 public meeting of the Parks and Open Space Advisory committee (POSAC), the director of prairie dog conflict resolution for the Humane Society of the United States (HSUS) told POSAC members that thinning prairie dogs does not work. The HSUS representative read a quote from a communication she received from Dr. John Hoogland, the leading authority on the Black-Tailed prairie dog:

“Several studies have demonstrated that Black-Tailed prairie dogs survive better and have higher reproductive success following reduction in colony size for natural and unnatural reasons.

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Consequently, thinning of prairie dogs is often short lived because in most cases populations quickly rebound.”

Thinning may also destabilize the social structure of the thinned colony, increasing the occurrence of prairie dog dispersal. To utilize the thinning method on colonies at Carolyn Holmberg Preserve is counterproductive to the department’s objective of population reduction. It is foolish to spend taxpayer money on an approach that will end in failure.

Parks and Open Space staff have stated that they intend to reach out to experts and do an extensive literature review to develop its “thinning” method next year in 2021 (pers. comm. 12/3/2020). It is unacceptable that this research work by staff will be performed after the commissioners adopt the draft plan. It should have taken place prior to the commencement of the public process. If the Board approves the draft plan with the thinning recommendation, the commissioners will essentially be giving pre-approval of a dubious, unsubstantiated prairie dog removal technique.

Boulder County wildlife management decisions need to be based on science, not on myths, bias, or unproven management techniques. I urge the Board of Commissioners to remove the recommendation of thinning prairie dog colonies from the Carolyn Holmberg Preserve draft plan. Please direct staff to go back to the drawing board and come up with a better plan that will benefit the Holmberg Preserve prairie dogs and the wildlife species associated with the prairie dog, like the Bald Eagle.

Thank you for considering my comments.

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**Paula Kelly • Lafayette**

12/7/2020 10:39:00 AM • comment # 72

The Carolyn Holmberg Preserve is a beautiful, ecological preserve where we can still experience nature in a natural habitat. It is one of the last remaining places in Boulder County where this is still possible, thus it’s name, Preserve. It is our duty to preserve places like this and keep it as natural as possible, placing this precious environment and all the species it supports as a priority over human interests. Protecting a pair of nesting eagles, kestrels, hawks and other raptors who migrate through, the lake that supports geese and migrating water fowl every year, the prairie dogs that support our bird and animal species needs to be protected to preserve this fragile ecosystem. Is it too much to ask to keep this small fraction of land in Boulder County protected from development “upgrades”? We don’t need paved trails and more parking lots, people that want to observe and find a place to immerse themselves in nature are happy to walk on dirt trails, and actually prefer it. This would be so detrimental to this fragile ecosystem. This is one of our last places and last chances to save a sensitive environment in our county for future generations.

Please keep this preserve as is, our precious gem in Boulder County.

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**Bev Baker** • Louisville

12/7/2020 9:12:00 AM • comment # 71

Dear Commissioners and BCPOS Staff,

I recognize the complexity of managing multiple uses of the CHP/RCF. Successful implementation of the management plan will depend on BCPOS dedicating resources to it as a high priority for the foreseeable future.

The health of riparian habitat should be prioritized over grazing, in contrast to what has happened to date. The riparian health recommendations on p. 47 and the H priority given to these recommendations in Table 1 should address this, as long as the necessary BCPOS and landowner resources are committed. I would like to see fencing in riparian areas minimized or eliminated, as it affects wildlife access to these important areas. Also, please refer to this CPW document for alternatives to barbed wire fencing (mentioned in Table 1), which is hazardous to wildlife - such as combinations of barbed wire with smooth or high-tensile wire:

<https://cpw.state.co.us/Documents/LandWater/PrivateLandPrograms/FencingWithWildlifeInMind.pdf>.

Re: proposed reduction of MOA acreages and increase of NPD acreage - are there any opportunities to expand MOA acreage north of fields 40 and/or 70 to avoid reducing overall MOA acreage on the property?

The draft plan includes "considering the potential to re-route the regional trail on a more permanent basis" - I support this concept. Based on the value of this property to wildlife, especially in the southern portion, I think redundant trails should be minimized or eliminated. In the long term, perhaps the proposed "green trail" along the north property boundary between 104th and Brainard Road, plus the north/south corridor along the old railroad grade, could be the permanent route and replace the sections of the Cradleboard trail east and west of 104th that have been seasonally closed - ONLY IF a trail along the railroad grade would not interfere with burrowing owl nesting. In general, a trail crossing a creek and riparian area has less impact to wildlife than trails following those corridors. Permanent closure and restoration of the Cradleboard Trail sections east and west of 104th that are already seasonally closed in some years would benefit riparian habitat and wildlife and reduce staff time now required to implement and maintain seasonal closures.

I strongly oppose a new parking lot at the south end of 104th street, and appreciate that POSAC voted to defer new trailheads. A parking lot in this location would remove and degrade more wildlife habitat, both from the footprint and by increasing concentrated human activity. Of particular concern are the proximity to Rock Creek (in or adjacent to the floodplain), plus prairie dogs and raptors, including bald eagles and red-tailed hawks that nest and hunt near this area. In just my two most recent visits to the area, I observed samples of the area's raptor diversity: a ferruginous hawk, bald eagle, sharp-shinned hawk, male and female northern harriers, and multiple American kestrels and red-tailed hawks, plus a

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coyote trotting south from the south end of 104th, carrying a freshly killed prairie dog. All except the sharp-shinned hawk were seen from near this proposed parking area.

Please consider other parking alternatives. Formalizing parking along Brainard Road makes sense for public safety and would have less impact to wildlife and habitat. If horse trailer parking is a priority, perhaps one or two spaces at the Stearns lot along the fence could be designated since they are already used for horse trailer parking, and/or provide for horse trailers along Brainard Road. I would also support other actions to address parking, especially during peak times - such as reservations or eliminating parking along 104th if it is a safety concern.

Thank you for considering my comments.

Bev Baker  
Louisville, CO

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**Suzanne Bhatt • Boulder**

12/7/2020 7:57:00 AM • comment # 70

Thank you for the opportunity to comment on the draft management plan for the Carolyn Holmberg Preserve at Rock Creek Farm. The focus of this plan should be on maximizing wildlife and habitat health of the preserve. The plan's update is an opportunity to restore much of the preserve to native grassland habitat and to re-establish and nurture the diversity of wildlife that once flourished there. To this end, I add my voice to the call to permanently close the "cut-off" trail that encroaches on the nesting territory of the resident bald eagle pair. Rerouting the trail down 104th Street is the best option and requires no additional incursions into the preserve. I am in agreement with other commenters that the entire southern portion of the area, including Stearns Lake, should be restored to native grasslands of a size that would support a thriving prairie dog population and perhaps once again be a home to now extirpated species, such as the burrowing owl, white-tailed jackrabbit, lark buntings, and others that have been driven out by current agricultural and development practices. I do not support the development of new trails inside the preserve, which would likely inhibit the reintroduction of these native species and put added stress on the nesting eagles. Cattle should be prohibited near riparian areas and any future grazing in restored grasslands should be carefully scrutinized and researched in terms of effects on habitat and wildlife. I am also opposed to plans to "thin" prairie dog populations, the key species required to restore burrowing owls and to maintain the nesting eagles, hawks, and other predators on the site. While walking in the preserve several days ago, I saw a coyote carrying a freshly killed prairie dog. If we are to encourage a rich wildlife presence in this area, then management must mean providing ample space for survival and foraging rather than "thinning", or more plainly, killing, a key grasslands species. I also echo calls for site-specific plans for restoration and protection of Boulder County species of concern, such as bald eagles, black-tailed prairie dogs, burrowing owls, and the northern leopard frog.

The management of our open spaces tips entirely too far toward agricultural interests. The damage to grasslands and subsequent loss of wildlife that has been allowed to occur on the farmland through

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irrigation changes, spraying and tilling near wildlife areas, and grazing near riparian areas is totally unacceptable and further infractions must be prohibited. These impacts on the natural characteristics of the preserve over the past two decades call for a pivot to a focus on native grassland and wildlife restoration with firm oversight and enforcement of any future actions by the tenants that would impact the health of this ecosystem.

I believe that most users of open space share my excitement at seeing native plants, birds, animals, and healthy stream systems in a natural environment. Re-creation of this environment necessitates that we do not add additional trails but instead do our observing from a distance on existing trail systems, allowing the land to heal and the native inhabitants to have space to thrive and reproduce without human interference. I hope you will take notice of the fact that virtually all of the commenters on this plan have emphasized protection for the wildlife and natural aspects of this important protected space above other purposes. This should be the primary goal and purpose of future management of the preserve.

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**Elena Klaver • Niwot**

12/4/2020 11:26:00 AM • comment # 69

Dear folks, I am a longtime Boulder County resident, birdwatcher, advocate for environmental protection, and a participant in a longstanding winter raptor survey route that includes the Holmberg Preserve and Stearns Lake. I am very opposed to the plan to build a parking lot on the south end of 104th Street, which currently is as natural an area as can be given the massive development surrounding it, and the plan to put trails into that part of the area, because it is used by Bald Eagles and Ferruginous Hawks, among other species. These birds of prey are already being squeezed out by encroachment, and the addition of a parking lot and more trails will only negatively impact them. I urge you to think first of the birds of prey and other native species whose habitat this is, and whose habitat is increasingly shrinking (I remember when one could see burrowing owls on this property) and not construct more parking lots and trails in sensitive habitat. Thank you for your consideration.

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**Ruby Bowman • Longmont**

12/3/2020 8:07:00 AM • comment # 68

Attached is a letter from Stand with Our Saint Vrain Creek regarding riparian health at Carolyn Holmberg Preserve.



#68

Bowman\_riparian\_hear

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**Diana Green • Broomfield**

11/27/2020 2:27:00 PM • comment # 67

We would like to take the opportunity to express a few more thoughts, like we have seen others do on this comment section.

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In regards to the prairie dogs, which we must agree, has had a population explosion that is out of control, we are not so sure that the existence of the prairie dogs is vital to the existence of the eagle pair. In all the years we have lived here, which was before the prairie dogs were moved here from Lafayette, we have seen many many birds of prey surviving quite well. They feast on a wide variety of food in this area. There are mice, and rabbits, and snakes and fish and even ducks and small birds. What we have never personally witnessed, is an eagle or a hawk or an owl nab a prairie dog. Not that it doesn't happen, but we've never seen it. Neither have our neighbors. I personally have seen all birds of prey around here with all of the other food sources. There is over 40 acres of prairie dog occupation that the birds of prey nor the coyotes (who have also exploded in number) can keep up with as far as population control. That says a lot.

There are many eagles living around Stanley Lake and surviving quite well. One eagle pair and 40+ acres of prairie dogs does not an ecological system make. I'd love to see the eagles stay. They've made their home here for many years. We love them! It's likely that they can still be capable of making their home here without prairie dogs.

I think this property is just too small to promote all the wonderful ideas for this open space. It would be like trying to put a prairie dog colony in the middle of town on a very very large park, and hope they don't overgrow the area. They need acres and acres and acres, thousands of acres, and still need to be constantly managed so as not to ruin all the natural grassland and keep their population in check.

Also, another note about the proposed parking lot at the end of 104th Street and the trail to the west bordering our property. It really is not a good idea for the reasons stated in our previous comments. To add, lots of people come to the end of the road to take pictures and observe the birds in our trees. Its just the right distance to be able to view the birds without disturbing them. A parking lot with all the cars, all the noise, all the foot traffic with a trail along the fence line near those trees, and small ponds, will surely be detrimental to those birds to have a safe and quiet place to nest and fish and hunt and get some shade. We love that people can view the owl or hawk nests from the road. But a parking lot AND trail will surely run them off. Let's keep that area safe for birds and for people to view them. Maybe the eagles will make another stab at building a nest there. It's a good neighbor thing to do. (Birds are neighbors, too)

We would like to add that the people who are farming their portion of the open space are doing a great job of being good land stewards. They rotate crops, keep weeds down, and provide a great place to visit for pumpkin picking and also seeing how a working farm operates. It's not just fun, but educational.

Bottom line, can the prairie dog numbers be kept in control? Can we maintain a lovely open space with them...or without them?

Thank you again for your consideration.

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**Diana and Alan Green • Broomfield**

11/25/2020 2:38:00 PM • comment # 66

I'm not sure I am within the time constraints for comments, and I apologize. I have been dealing with health issues since Feb until October and am just finally able to do this. I hope you still have time to consider my comments.

1st of all, thank you for working on this open space area. It's beneficial to all who enjoy it. As a direct neighbor, my husband and I appreciate all it has to offer. We, too, want to be good stewards of our land and be good neighbors to the open space.

We are happy to hear you are addressing the prairie dog population. For many years now, it has exploded. Like my neighbor to the west, the prairie dogs have encroached on our property to detrimental proportions. We have tried to control them on our side of the fence, but it is so expensive and time consuming, we have little time for anything else. As soon as we think we've taken care of the problem, 3 days later they're back and 5 days later they're back to nearly what they were. It's not tenable. We have much work to do on the farm/ranch besides trying to keep up with the prairie dog population and the huge expense of doing so. We experienced a very emotional loss because of it. Just this Spring, Al's partner and long time trusted friend, his horse Joker, who together have been on many trips and hunting expeditions and has been Al's much loved companion, died because of the prairie dogs that have overrun our southern border. We had just retired this lovely horse, but sadly, he stepped into a prairie dog hole near the fence between us and the open space and severely broke his leg. It was a horrible injury and horrible death, one you would never wish on anyone or anything. He suffered terribly for many hours until we found him and had to destroy him. It was devastating to do and heartbreaking to witness. This type of trauma could happen in a neighborhood, to a child or a dog. Plague is another issue. No one wants plague in their back yard or anywhere in their neighborhood. We can't state strongly enough that we are just happy that BC Open Space is finally addressing this problem.

The other issue is the possible trail plan that would be on the north end of that prairie dog reserve where the south end of our property borders the open space. We have large cottonwood trees that have been the home of owls and hawks. The eagles were trying to nest here before they gave it up, due to the hawks running them off for their own nesting plans, and the eagles settled in the dead tree where they currently reside. Boulder County Open Space closed the trail to protect them. I hope you would consider the same protection around the trees and ponds on our property that border Boulder County Open Space.. by not putting a trail there. Many birds come to the area to find shade, nest, fish in the little ponds below the trees for fish and frogs and snakes and whatever the ponds hold. We've had owls, hawks, blue herons, night herons, white egrets, as well as the eagles, white pelicans and many duck varieties that have come to visit. Following the Boulder County Open Space precedent of closing the trail near the eagle's nest, I would suggest not putting a trail at that location where our properties

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connect, for the very same reasons. It's a quiet spot there. A safe spot for all those birds. We fear the foot traffic would be detrimental.

That proposed trail area between our properties is also an area that floods - like a raging river! We understand a parking lot at the end of 104th is in the plan. That would be a certain underwater adventure at some point. Even just heavy rains make the area at the end of 104th street a muddy and debris mess. We might suggest that where the existing trail that exits at Brainard Drive could be a better spot. Many people already park at that trail head that comes out at Brainard Drive. It's at higher ground and would not be affected by the floods. It is our understanding that Broomfield County has already secured a right of way to extend the trail from the west of Brainard Drive that would tie into the trail at Flat Irons Mall. A parking lot at the end of 104th Street is also a huge intrusion to our property. We built here for a reason. The goal is for all of us to be good neighbors.

Also, not sure how needed the new parking lot might be. This summer was the exception to the rule. Because of Covid 19, people were coming in droves to the parking lot at Sterns Lake. We have seldom seen that parking lot full and extend out into the road. It was a one off year. No one wants to waste our tax dollars. Maybe money could be spent to improve what already exists where restroom facilities are already in place, or a higher ground area, or other issues in your plan.

In any case, thank you for all the planning you have done. It's a large area with many things to consider. We're also happy to know you are working on trying to recreate the natural grasslands, too. When we 1st moved here, it was so beautiful and green. I read in the open space plan that prairie dogs moved here 2 years after we built. We understand the eco system for the wildlife, but do have problems looking into that prairie dog reserve and seeing nothing but weeds and brown dirt. We hope you can find that balance you're looking for. And include a way to control the population of the prairie dogs. We've wondered if the open space is just not big enough to accommodate all of the uses. We know you'll figure it out, one issue at a time, and hope you'll consider your neighbors to the north. All of our goals seem to be the same...good neighbors and good stewards of the grounds of which we are all responsible.

Thank you for your consideration.

Respectfully,  
Diana and Alan Green

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**Michael Morton • Boulder**

11/23/2020 7:21:00 AM • comment # 65

I am writing to say I am opposed to the addition of a parking area at the end of 104th street, as it is not in the best interest of the critical preservation of raptors and other wildlife that call this location home. I thought the idea was to "preserve". Please keep the primary focus of any efforts to benefit the native

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wildlife. Many others have posted scientific facts and observations regarding the pressures already being placed upon the nesting bald eagles. Anyone can look at the over-development to the west and determine that it will not take much more to completely eliminate the remaining raptor activity that many of us enjoy observing. This was one of the first areas that I discovered when i moved to the area over 20 years ago. I still regularly visit i order to appreciate and observe the wildlife activity. Please help preserve this area rather than help eliminating it.

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**Dana Bove • Boulder**

11/20/2020 11:43:00 AM • comment # 64

Ms. Ratzel, BCPOS Directors, and Staff,

As you are aware FRNBES was present at last night's POSAC meeting and you heard our comments. We were heartened to witness that several POSAC members gave serious consideration to ours and any other stakeholder comments that were submitted. Thank you to those members.

Although we observed that OS staff responded during the meeting to concerns and issues expressed by several of the POSAC members during the meeting, we saw no evidence that staff was going to modify anything in the original draft plan based on the multitude of informed and thoughtful public comments that have been submitted--both oral and written.

FRNBES could share many example of our perspective on how public comments have largely been discarded. Here are just a few examples:

1) Staff promised to research the CPW RSO buffers as they apply to nesting eagles and the proposed parking lot at the South end of 104th Street. There was not even a mention of that research by staff during the POSAC meeting until Mr. Kuhn pressed the issue during his presentation, later by chat with Therese Glowacki during the meeting.

2) The Cropland Policy mandates a wildlife management plan for nesting eagles--in fact all species of special concern on the property. Many stakeholders in their round 1 comments supported a nesting eagle management plan and the recommendations in the EEI report. Once again, there was not even a mention of a wildlife management plan for nesting eagles in the staff's draft plan, nor was there a mention of it last night by staff, or POSAC for that matter. It appears that BCPOS staff, POSAC, and the Commissioners do not take the mandates and guidelines in these carefully crafted plans with any level of seriousness.

3) Staff did not address encroachment issues from the proposed RR grade trail in the area where burrowing owls last nested. This is beyond troubling, as CPW's HPH buffer recommendations for burrowing owls in that area would be violated. While Ms. Spaulding deflected this by focusing on nests on the very south of the property, it is incomprehensible how a planned trail would be allowed to fall within CPW buffers distances of their last nesting area. Many stakeholders voiced their concerns about

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encroachment and preservation of habit for these owls, yet staff is recommending a trail that will be with the CPW's HPH buffer for these owls, not to mention the same area the nesting bald eagles pick up prairie dogs on most days.

4) Staff presented a proposal to POSAC that reflected no variance or consideration of the totality of public comments since the initial draft plan. Nor, did it hardly reflect the preponderance of public comments before the draft plans were distributed in October.

It is true, staff responded with a willingness to address some issues when insisted upon by several of the POSAC members. Otherwise, it appeared that staff for the most part views informed public input in the same way as one of the POSAC members that admonished any micromanaging of staffs plans and insight. To that POSAC member, I'd say why participate in such a committee if you see no need for a public process.

Thank you  
 Dana Bove  
 FRNBES

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**Michelle Hayward • Kempston**

11/20/2020 8:15:00 AM • comment # 63

I strongly object to the proposal made in the Carolyn Holmberg Preserve at Rock Creek Farm Management Plan to destroy 40-acres of prime burrowing owl habitat; a very rare Habitat Conservation Area (HCA) within Boulder County where prairie dogs are permitted to live undisturbed. The proposed downgrading of these areas to a No Prairie Dogs (NPD) area will see these keystone species yet again labelled as pests whose lives will be put at risk; all for the pumpkin industry that will further exploit water extracted for the Colorado River.

Apparently the 72% of grassland throughout the county designated as NPD is not enough. The plan proposes converting this key area of the tiny 4.8% of HCA that exists countywide to NPD; making the majority of the prairie dogs essentially homeless, and as good as dead. Relocation is routinely mentioned in the plan; however the survival rate of prairie dogs, combined with the history of gassing and poisoning of these wonderful animals means that those that survive the move will be a tiny fraction of those currently happily living in the Carolyn Holmberg Preserve. There is also the question of finding a patch of the (now less than) 4.8% of HCA-land where these populations can survive, that is not already occupied. Prairie land restoration and expansion outside of the Carolyn Holmberg Preserve is therefore crucial.

Prairie dogs are an essential keystone species whose presence and extensive burrows are essential to the survival of at least 136 other species, including endangered black-footed ferrets. For example, the burrowing owl uses their burrows and the alarm calls made by prairie dog communities to protect themselves. Prairie dogs are the neighborhood watch of the wild. Their communication network

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benefits all potential prey, and they in turn are prey for a multitude of other species, including the bald eagle.

It is not they who are to blame for the loss of the 'valuable and limited resource' of 'intact native grassland that has never been ploughed', which only exists in field 42 and in remnants in field 55. You seem to play down the damage livestock does to PUBLIC land (subsidized and offered to ranchers at a knock-down price), the fact that these plans will further limit where prairie dogs can go; almost forcing them onto the 'protected' grassland areas, and the fact that they also did not invent the plough!

To date, the US has killed 98% of all prairie dogs, amounting to billions of animals. Their range has reduced to just 5 percent of their historical territory, yet this still isn't enough for some. Grassland and prairie dogs have lived in harmony for millennia. It is us humans that have truly eradicated the ideal of the prairie that we now seek to conserve.

All wildlife needs to be protected; not just for the sake of individual species, but for the mental health of those of us that enjoy natural prairie land; including these beautiful, smart and charming animals. Reviews of the area shows how much this park is loved by locals and tourists alike. It provides huge physical and psychological benefits to all who visit. Public land is just that. It does not belong to opportunists and exploiters; it belongs to us all. Nature should not be forced into competition with livestock and agriculture for limited resources. These ecosystems must be protected!

The Carolyn Holmberg Preserve is rich in wildlife in an area where habitat is disappearing at an alarming rate, due to the continuous expansion of the surrounding cities of Broomfield, Louisville and Lafayette. If this plan is approved, agricultural sprawl will undoubtedly swallow up and irrevocably change this much-loved area.

I urge you to please reject the removal/eradication plans for prairie dogs and the expansion of the production of pumpkins and hay. These mono-cultures are not essential. The maintenance and restoration of prairie land and all the species that contribute to its ongoing existence, through a complex web of feedback loops is.

Please maintain the HCA areas and support the prairie dog communities on these lands.

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**Sandy Backlund • Lafayette**

11/19/2020 2:30:00 PM • comment # 62

Anything you do to facilitate the "removal" of prairie dogs within 1.5 miles of the active Bald Eagles nest would be the same as wounding a wild animal and then leaving it to languish. I've studied eagles for two years now, observing them closely. They RELY upon the prairie dogs, a natural part of the ecosystem, for their food. The further they must forage from their permanent home (yes, it's permanent), the more danger to the lives of their eaglets. Interrupting their food supply is interrupting their survival. The idea that a farmer can kill anything that harms his crops is a colonial throwback in thinking. Humans

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need to co-inhabit the earth with its creatures. The creatures are not their "guests". It is the other way around. Don't close the eagle's grocery store. They can range further for food, but it prevents them from preserving the life within their eggs, saps their strength, and threatens the next generation.

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**Chris Petrizzo • Broomfield**

11/16/2020 2:18:00 PM • comment # 61

Thank you to the many scientists and other public servants who put so much research and thought into the draft plan. Clearly quite a lot of work has gone into it, and I greatly appreciate everyone's diligence and integrity in trying to balance the many demands upon, and resources within, RCF/CHP.

In terms of that balance, the thing that most concerns me in the draft, is the weight given to growing pumpkins and hay. I believe the Plan overemphasizes agriculture, which provides little if any benefit to local residents, at the expense of wildlife habitat, which is under constant assault, and truly a precious resource valued by many.

Specifically, I oppose the redesignation of the 40-acre preserve. Tenant actions may well be part of the reason BUOWs no longer nest there, as in 2012 (the last year they nesting there) I documented tenant activity and incursions into the area that likely disturbed the BUOWs. Now that the owls have been chased off, the Plan "gives" the tenants that space. This is wrong and at the very least is imprudent to reward such behavior.

In regard to the tenant's negative impact upon nesting BUOWs, I also suggest that some consideration should be made within the Standard Operating Procedures section of the Plan, for accountability for tenant violations of their agreement. My experience with this tenant's violations/missteps in the past (poisoning PDs during BUOW nesting season, applying herbicides adjacent to active BUOW burrows, driving ATVs within the 40-acre preserve while BUOWs are actively nesting, cattle grazing in riparian zones, cattle loose on trails) has been that the tenant is allowed a "free pass" by saying "I didn't know" or "my worker made a mistake." A failure to provide ramifications for actions does nothing to prevent such actions in the future. And as stated above, it appears that in some ways the tenant is actually being rewarded for misbehavior by getting more land.

In regard to Prairie Dog Management, it appears that not much consideration has been given to redesignating HCA/MOA/NPDs. The nesting Bald Eagles and Burrowing Owls, and multitude of raptors and mammals on down the line all depend upon this keystone species, yet the Plan seems to place a high priority on removing/thinning Prairie Dogs from areas that were designated NPDs/MOAs many years ago, when Boulder County had much more prairie and wildlife.

Perhaps agriculture wouldn't play such a prominent role in the plan if someone who directly benefits from that agriculture were not on POSAC? I understand the tenant is not able to participate in

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discussions or decision making on this issue, but his participation in POSAC, and his influence on fellow committee members, does call into question the Plan's goals and its objectivity.

Thank you for considering my comments.

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**Layne Cook • Broomfield**

11/12/2020 4:54:00 PM • comment # 60

I guess I don't mind the prairie dogs making the place look like a moonscape, but I do hate it when they create a volcano in the middle of the trail. We either need a way to stop new volcanos and fix the existing ones, or keep the rodents away from the trails.

Also, get rid of the opening "Cultural Heritage Acknowledgment". It's silly, and opens up a can of worms. The last inhabitants of the land took it from someone else, who took it from someone else, etc. We are all owners of the land, and all should have an equal say in it, regardless of race.

I much appreciate the work done to preserve this area. Thanks.

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**Carbon Property LLC • Broomfield**

11/10/2020 9:20:00 AM • comment # 59

First, I would like to thank Parks & Open Space for taking into consideration my thoughts and input regarding the updated plan for the Carolyn Holmberg Preserve at Rock Creek Farm. As one of the few adjacent landowners I offer an everyday life perspective. I have a few points I would like to address below which directly impact myself, as an adjacent landowner. I would also say I have been active in communicating with Parks & Open Space and appreciate everyone's willingness to find a solution that works for all interested parties and is sustainable for future decades.

Second, the main points I would like to address are prairie dogs, trailheads, and parking lots. I would like to first state the goal of prairie dogs from my point of view is continual management. Too few and too many of something are both negative. To give those a perspective, my farmland borders the north boundary of the CHP/RCF, adjacent to field 44. This is an active farmland and horse pasture, along with 1200+ prairie dog holes all of which have come from the Open Space in field 44. To say that I have spent tens of thousands of dollars and years of not being able to get my land to an acceptable state would be a great understatement. I would like to emphasize that the 1200+ holes are ONLY on the bottom half of my property and continuing to move northward through my property. I would appreciate significant consideration of a more enhanced prairie dog management plan on field 44. The current plan and overtaking of prairie dogs in field 44 has all but ruined the south half of my property and the financial impact is unsustainable. The second topic of concern is the proposed year-round trail head at the north end of Brainard, heading east and connecting to 104th, along the bordering property lines. As much as I would like to not have the trail on the south border of my property, the new plan should facilitate and work for all. I would recommend those from Parks & Open Space come to my property to get a closer look at the current alternative trail and what would be needed to make this work. There are multiple

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spots that have over 20+ years of adjacent property drainage locations and low spots directly on the current path making it an unsuitable solution in its current form. I would hate to use taxpayer money for something that could be an ongoing problem and cost more in the long run. The last point I would like to address are the proposed parking lots. The parking lot on Brainard would be preferable to expand to the south of the existing dirt/mud lot. If expanded to the north, it would be closer to the hill which is a blind spot for road/pedestrian traffic and is close to the front of a residential driveway. I would recommend it would be expanded to the south of the existing lot. I would also recommend the proposed expansion of the existing 104th Stearns Lake lot be expanded in its current location instead of a new lot at the south end of 104th. Since there is some traffic on 104th already around the existing lot, it allows for less loitering to take place in the parking lot after hours. For those not aware of what takes place after hours at the south end of the 104th, I would recommend checking firsthand. By creating a welcoming parking lot at the south end of the road, this would be an invitation for a much nicer after-hours extravaganza.

Finally, my intention is not to come from a perspective of why things cannot work. There are few people who have been negatively financial impacted by field 44 as well as few people to see the landscape daily and what happens after the sun goes down. I look forward to continuing to be a great neighbor who appreciates open space and the surrounding area. Thank you for your consideration of my comments.

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**Chris Boardman • Longmont**

11/9/2020 8:49:00 PM • comment # 58

-I object to the proposal to turn a prairie dog and burrowing owl preserve (Field 7) into irrigated cropland. We have enough pumpkins and other crops, but not enough wildlife habitat.

-Drop the idea of thinning prairie dog colonies. There is no scientific evidence that this has the desired effect; in fact, it can result in more dispersal of prairie dogs, as documented in John Hoogland's research.

-Cattle should be banned from streams and riparian areas. They may be causing the E. coli problem in Rock Creek.

-The number of cattle should be limited to prevent overgrazing at CHP/RCF.

-Regular water sampling should be done for the Keep It Clean partnership.

-There is urgent need for a plan to support the Stearns Bald Eagles. There should be limits on the number of prairie dogs that can be removed from the multiple objective areas, since the eagles depend on those prairie dogs for prey.

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**Ruby Bowman • Longmont**

11/9/2020 8:26:00 PM • comment # 57

The draft plan proposes to convert Field 7, the prairie dog/burrowing owl preserve at the north end of Rock Creek, into irrigated cropland. Field 7 is listed as critical wildlife habitat (#36) in the Environmental Resources Element of the Boulder County comprehensive plan. Boulder County Parks and Open Space staff have informed me that if this property is approved for agricultural use, it will be handed over or “folded over” into the lease of the single tenant farmer at CHP/RCF. This non-competitive approach gives the appearance of cronyism. This approach should have been addressed in the draft plan for the sake of transparency.

The draft plan recommends removal of prairie dogs rather than removal of cattle grazing on grasslands. It recommends thinning prairie dogs colonies instead of limiting the number of cattle at CHP/RCF. As far as I am concerned, this draft plan was written to accommodate agricultural interests over the interests of wildlife and the many residents who support our wildlife.

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**Pamela Wanek • BROOMFIELD**

11/9/2020 5:58:00 PM • comment # 56

Comments provided by both Lindsey Sterling-Krank, Boulder resident and Pam Wanek Please see attached pdf



#56\_Wanek.pdf

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**Antonio Lopez • Longmont**

11/9/2020 5:00:00 PM • comment # 55

I am a 34 year old native of Colorado. In my lifetime I have seen immense changes in the landscape. I am the youngest of five children and grew up in the San Luis Valley. Several of my older siblings went to college at the University of Colorado and I remember my family driving in our blue station wagon going to visit them. The US 36 Corridor and north metro area had wide swatches of open space. I still remember being enthralled by how many prairie dogs and birds of prey I would see. Fast forward to the present, and mass urbanization of the Front Range has led to the loss of many wild places and biodiversity. Wildlife habitat has become fragmented. The proposed plan for Carolyn Holmberg Preserve should not further fragment what little habitat is left.

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**Linn Barrett • Greeley**

11/9/2020 3:12:00 PM • comment # 54

Hello and thank you for the opportunity to comment on the Carolyn Holmberg Preserve Management Plan. Please consider my input as follows:

\*I do \*not\* support removal of prairie dogs\* in order to make room for pumpkins and hay, and quite frankly, I think it absurd that Boulder County officials would consider this proposal. Removing the

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prairie dogs from HCA acres and from a burrowing owl preserve would severely, negatively impact Boulder's prairies, raptors, fox, coyotes, bobcats, burrowing owls, educational opportunities, soil health, entire biotic community and the values of Boulder's residents. \*Please ensure that the Habitat Conservation Areas (HCA) lands are maintained\*, including removing cows and reseeding land with native plants to support prairie wildlife. \*Please do not remove the prairie wildlife from those areas!\* Thank you.

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**Stephanie Rowe • Louisville**

11/9/2020 1:46:00 PM • comment # 53

Updates to the Carolyn Holmberg Preserve plan include a new parking lot, new trails, and cows for slaughter and human consumption, all in areas currently home to raptors and prairie dogs. Exterminating prairie dogs, and by extension the species that depend on them, is the opposite direction CHP should be moving in: the 40 acres of habitat currently available to prairie dogs “ whose populations in Boulder County have declined more than 95%” should be EXPANDED rather than reduced. To support native wildlife, and for their own intrinsic value, there should be no areas at CHP off-limits to prairie dogs. The Carolyn Holmberg land is, after all, a PRESERVE.

Thank you.

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**Lynne Glaeske • Denver**

11/9/2020 1:34:00 PM • comment # 52

Along with many other Coloradans, I would like to learn more about this plan before Boulder County rushes it through.

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**Theo Kuhn • Denver**

11/9/2020 11:28:00 AM • comment # 51

I've visited Carolyn Holmberg Preserve both to enjoy the scenery and as a Bald Eagle monitor for Front Range Nesting Bald Eagle Studies. The proposed infrastructure projects in the draft management plan should be attentive to the needs of sensitive wildlife and must follow the best available guidance on the protection of these species.

The draft plan includes proposals for a new parking lot and several trails at the south end of 104th street, an area used by Bald Eagles and other raptors. In reference to Bald Eagle nests, CPW's 2020 raptor guidelines recommend “No Surface Occupancy (NSO) beyond that which historically occurred, within ¼ mile radius of active nests. No permitted, authorized, or human encroachment activities within ½ mile radius of active nest sites from December 1 through July 31.” The proposed parking lot is within ¼ mile of Nest F (see attached figure), in which the preserve's resident Bald Eagles hatched two chicks in the spring of 2020 and which therefore meets CPW's definition of an active nest: “any nest that is frequented or occupied by a raptor during the breeding season, or which has been occupied in any of the five previous breeding seasons.” A new parking lot and trail would qualify as surface occupancy

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“beyond that which historically occurred.” Based on CPW’s recommendations, the south end of 104th is not a suitable site for a new parking lot and trailhead.

Speaking personally, I value this area as a peaceful place to watch wildlife. The first time I came to the area, it struck me as a rare surviving piece of an older Colorado that I hadn't seen before, a fragment of the landscape from before developments ringed Holmberg. Converting it to another bustling recreational hub would erase this quality and go against the desires of most visitors. As the draft management plan notes, visitors to CHP say that the preserve has "the right amount of trails" more often than almost any other preserve in the Open Space system. Based on the overwhelming majority of public comments so far, rather than pursuing unnecessary further development of the preserve, visitors would prefer that BCPOS prioritize wildlife more than it currently does. I appreciate that BCPOS has given us visitors the opportunity to express our desires for the preserve; I urge BCPOS to not simply acknowledge the public consensus, but make management decisions that actively incorporate it. Thank you.



#51

Kuhn\_nest\_f\_and\_new

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**Charlotte Bujol • Boulder**

11/9/2020 10:48:00 AM • comment # 50

Hello,

I was incredibly disappointed to read that BCPOS is advocating for a new parking lot on the south end of 104th Street in the new CHP draft plan. For anyone that has had the pleasure of experiencing the quiet and take in the presence of wildlife, particularly in the form of raptors including ferruginous hawks, nesting bald eagles, owls, red-tailed hawks, etc, they know how very precious this area is. Eagle, owls, and other raptors perch and nest in close proximity to the proposed parking area, and the flurry of associated human activity from the parking lot would not only degrade the human experience, but negatively impact this raptor-rich area. I would encourage BCPOS staff management to be more empathic with respect to how much humans deeply enjoy the raptor experience in this area.

These “Environmental Goals” in Section 1.3 of the 2020 CHP plans are key. In particular B.3 states that "critical wildlife habits should be conserved and preserved in order to avoid the depletion of wildlife and to perpetuate and encourage a diversity of species in the county.” Or, Parks and Open Space Goals, section C.1 states that “provisions shall be made for open space to protect and enhance the the quality of life and enjoyment of the environment.” Or, C.3 that states that “Open space shall be used as a means of preserving the rural character of the unincorporated county and as a means of protecting from development those areas which have significant environmental, scenic, and cultural value. (Highway 287 is a scenic corridor.)

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Any new infrastructure projects in the draft management plan should be pursued with attention to the needs of sensitive wildlife and must follow the best available guidance on the protection of these species. The proposed trail along the Railroad grade in the west section of the CHP will not only come with 200 meters of past burrowing owl nests, but with transect critical habitat where nesting bald eagles commonly hunt.

The the CHP draft plan includes proposals for a new parking lot and several trails in areas used by Bald Eagles, burrowing owls and other raptors. With respect to nesting bald eagles: CPW's 2020 raptor guidelines recommend "No Surface Occupancy (NSO) beyond that which historically occurred, within ¼ mile radius of active nests. No permitted, authorized, or human encroachment activities within ½ mile radius of active nest sites from December 1 through July 31."

The proposed parking lot is within ¼ mile the 2019 season active bald eagle nest that hatched two chicks. Therefore this nest tree meets CPW's definition of an active nest: "Any nest that is frequented or occupied by a raptor during the breeding season, or which has been occupied in any of the five previous breeding seasons."

A new parking lot and trails would qualify as surface occupancy "beyond that which historically occurred", so for BCPOS to follow CPW's recommendations while pursuing this planned construction at the current site, the 2019 nest that would have to remain unoccupied for five consecutive years.

Please: a parking lot at the end of South 104th Street and trail on the west Railroad grade are inconsistent with stated goals and policies of the CHP and the Boulder Vally Comprehensive, plan, the latter mandating that critical wildlife habitat for species of special concern – bald eagles and burrowing owls – be protected and preserved.

Thank you very much for your time and consideration!

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**Ruby Bowman • Longmont**

11/9/2020 10:11:00 AM • comment # 49

Members of the Historic Preservation advisory committee,

Thank you for this opportunity to provide input on the draft plan for the Carolyn Holmberg Preserve at Rock Creek.

On the first page of draft plan, it reads:

In the spirit of healing and education, Boulder County Parks & Open Space acknowledges all the contemporary American Indian tribes with ancestral lineage in the State of Colorado, which includes the Arapaho, Cheyenne, and Ute people, whose traditional homelands included Boulder County at the

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period when the non-natives invaded and seized their land for their own benefit. We recognize all the indigenous peoples that came before non-natives as the original inhabitants of the land and the attempted erasure of those people and their culture by the government our department represents.

Parks & Open Space appreciates the thriving and diverse indigenous communities in Boulder County today and acknowledges our need to build stronger relationships with local indigenous people and tribal governments in order to promote their legacy of occupation on the lands our department is charged with managing on behalf of the residents of Boulder County.

The above is a strong statement by Boulder County, acknowledging its role and the role of European settlers in stealing Indian land from the Arapaho, Cheyenne, and Ute tribes. In order to build “stronger relationships with local indigenous people and tribal governments,” as stated above, Boulder County should do outreach to local Native American groups and to the tribes who once inhabited this area for their input on the draft plan. I saw no referral to the Northern Arapaho of Wind River and other Indian Nations or groups in the plan. Did Boulder County Parks and Open Space staff formally contact the Indian tribes and ask for their input? There may be significant historical artifacts or sites that the tribes may know about and would like to be protected.

If Boulder County is serious about building stronger relationships with people of First Nations, a plan goal should be added reiterating this: To build stronger relationships with local indigenous people and tribal governments in order to promote their legacy of occupation on the lands Boulder County Parks and Open Space department is charged with managing on behalf of residents of Boulder County.

Respect for native cultures goes beyond just gathering with tribal members to forge new relationships. Recognition of native cultural beliefs that living creatures, like Bald Eagles, play an important part in native way of life and their creation stories. For many tribes Eagles are sacred beings. A Bald Eagle management plan should be developed for the Carolyn Holmberg Preserve to ensure sustainable habitat is created and maintained.

Words are empty if they are not backed up with action. Government made promises to Native Americans in treaties saying people would keep their land, sacred sites and way of life. But as Red Cloud, the great leader of the Oglala Lakota, stated:

“They made us many promises, more than I can remember, but they never kept but one; they promised to take our land, and they took it.”

I am Native American. I am Dine or Navajo. The past lives with me every day of my life. My grandfather survived the assault of soldiers on the Dine’ because his grandmother hid him in the caves of Canyon de Chelly of Arizona when he was a child.

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Boulder County's Native Land and Cultural Heritage acknowledgment is important, but it has to be backed up with meaningful action to be relevant.

Thank you for considering my comments.

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**Dana Bove • Boulder**

11/8/2020 11:58:00 PM • comment # 48

BCPOS Staff and Management: At least 58 of the originally submitted comments for the CHP reminded that the 2017 Boulder County Cropland policy required a wildlife management plan for all species of special concern on the CHP property. There was not even a mention of a wildlife management plan for the nesting bald eagles, or burrowing owls in the CHP draft plan. Similarly, 8 organization representing multiple members and 87 individuals requested an extension to the public comment period on the CHP draft plan. A letter from BCPOS staff only addressed the petition as if it was submitted by only one group--FRNBES. Many of found Deb Gardner's comment by email interesting, indicating that she like so many others in Boulder County were impacted and "distracted" by the wildfires...one of the main reasons for the petition. Yet, she then contradicted her own logic by stating in the next sentence that there will be plenty of time for county residents to comment.

And last, FRNBES did submit a CORA request on prairie dog removal around all BAEA nests on or adjacent to BCPOS properties. This information was needed to ascertain any validity to BCPOS argument that past nest productivity has any bearing on current prey needs for nesting bald eagles at Holmberg or other county properties.

Whereas, BCPOS and the County Commissioners indicate that the public will be included, and our comments incorporated in decisionmaking, I personally have never seen much indication that this is indeed the case.

#### Recommendations

1. A site-specific management plan for Bald Eagles at Carolyn Holmberg Preserve must be developed. This is required by BCPOS Cropland Policy (2017), and should include the following:
  - a. Measures to ensure abundant prey resources for Bald Eagles and other raptors
  - b. Consistent signage to keep recreationalists out of sensitive areas.
  - c. Yearly (at a minimum) consultations to assess electrocution risk from nearby power lines and identify mitigation targets.
  - d. Contingency plans for trail closures depending on where the Bald Eagles nest and the timing of their reproductive activity. Closures should extend until the pairs' juveniles have dispersed from the territory.
  - e. A commitment to regularly consult with FRNBES on management decisions that may affect resident Bald Eagles. Due to the frequent, consistent and quantitative observations of FRNBES staff and volunteers, our group can provide land managers with information that covers all seasons and is

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significantly more detailed and up-to-date than that which is typically available from county, state and federal agencies.

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**Cynthia Bedell • Louisville**

11/8/2020 11:33:00 PM • comment # 47

Hello,

I am writing to say I am opposed to the addition of a parking area at the end of 104th street, as it will be deleterious to wildlife, reduce green space, and create problems for pedestrians.

Also, I am opposed to changing the designation of the current 40-acre preserve (field 7) from prairie dog preserve to active agricultural. The black-tailed prairie dog (*Cynomys ludovicianus*) is a vitally important native species in Colorado and needs as much protected habitat as possible.

- In Boulder County over 95% of black-tailed prairie dog habitat has been lost to human development.
- With the loss of prairie dog habitat, there is also a decline in many important associated species, like burrowing owls, ferruginous hawks, and black-footed ferrets.

Thank you for considering these important points during the management plan update,  
Cindy Bedell  
Louisville

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**Dana Bove • Boulder**

11/8/2020 11:13:00 PM • comment # 46

Limits must be established on prairie dog take on MOA designated tracts within the Carolyn Holmberg Preserve (CHP) to maintain sufficient prey resources for Bald Eagles and other raptors.

Nearly 59% of land at the Carolyn Holmberg Preserve (CHP) or approximately 660 acres is designated as no prairie dogs (NPD) under the current CHP draft plan (figure 1). Federally protected nesting bald eagles at the CHP depend on prairie dogs as their primary prey at CHP. Since such a high percentage of prairie dog removal is allowed at the CHP via high NPD designations, it is essential for sufficient number of prairie dogs be conserved on the remaining land parcels (MOA and HCA parcels). For the nesting bald eagles at Holmberg, this is especially important as scientific studies by FRNBES (figure 1; table 1) demonstrate that prairie dogs comprise a minimum of 33% of their prey during the time period from incubation to juvenile dispersal. Furthermore, during this same time period, the Holmberg nesting bald eagles derived a minimum of 27% of prey from ½ mile of their nest. The importance of near-nest prey retrieval has also been documented at 4 other bald eagle nests studied by FRNBES, with prey recoveries within ½ mile of nests ranging from 23 to 46 percent (table 1).

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In the absence of prairie dogs as a potential prey source on 59% of CHP land, prairie dog management on the nearly 310 acres of MOA land to the southwest of Stearns Lake – just north of the current bald eagle nest – becomes critical for these nesting bald eagles. However, BCPOS management policy sets no upper limit to prairie dog removal on MOA parcels at the CHP, thus making 99.9% an upper limit for kill or capture (lack of upper removal limit in MOA confirmed by BCPOS management). The absence of any restricted MOA limits at the CHP is unacceptable, especially considering the stated experimental nature of grassland restoration on the MOA parcel in the southwest portion of the CHP property (figure 2). As stated on p. 43 of the CHP draft plan, “the option to reduce densities of prairie dogs is a long-term commitment that requires on-going staff time and funding each year, and one that staff has little experience in. Restoring grasslands in the presence of prairie dogs, even at low densities, is challenging and typically ends with failed establishment of the seeded species.

Whereas FRNBES supports restoration of grassland species at CHP, the draft plan language as excerpted above emphasizes that grassland restoration on much of this 310-acre MOA parcel will be trial and error. The nesting bald eagles and other raptors that depend on these prairie dogs are at risk in this experiment, as the draft plan allows unlimited removal of prairie dogs in these MOA areas. BCPOS management recently suggested that stakeholders simply trust that BCPOS will employ prairie dog removal strategies implemented previously on MOA land on other space property. That is not a reasonable expectation of the public, as 1) the CHP management plan could be in place for another 10 years or more, and 2) what will ensure that the need to retain sufficient prey for nesting eagles and other raptors on these MOA parcels will prevail over the enthusiasm for success of the experimental grassland restoration project? An upper limit to prairie dog removal on MOA parcels at CHP must be set, with assurances that no more than 15% prairie dog removal will be exceeded.

FRNBES reminds the Boulder County Commissioners, POSAC, and Staff of their obligations to uphold the landmark agreements in key Boulder County Policies and Plans. One such critical policy pertains to the federally protected nesting bald eagles at CHP and is found in Section 9.1 of the 2017 Boulder County Cropland Policy. It states that “Boulder County and its agricultural tenants shall abide by all federal and state laws governing wetlands, wildlife, and plant species.” This policy applies to all CHP management decisions and plans that may impact federally protected bald eagles that nest on the property. Bald eagles are protected under the Bald and Golden Eagle Protection Act (BGEPA). Under BGEPA, it is unlawful to “disturb” bald eagles to a degree that causes or likely causes “injury” by substantially interfering with normal feeding, foraging, or sheltering behavior.

BCPOS management has in the past pointed to recommendations and consultations from state and federal wildlife agencies as evidence that federal laws regarding eagles have been abided by. Following recommendations or consultation by state or federal wildlife staff does not in any way equate to abidance of state or federal laws. In addition, the decision by U.S. Fish and Wildlife Service (USFW) to choose NOT to investigate, prosecute, or show interest in BGEPA violations, has no bearing on whether a citizen or municipality has violated or failed to abide by federal law. The language of BGEPA clearly

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states the nature of activities that are in violation of, or that fail to abide by this federal law. Non-abidance or violation of BGEPA includes any activity that disturbs bald eagles to a degree that causes or likely causes “injury” to an eagle by substantially interfering with normal feeding, foraging, or sheltering behavior, based on the best scientific information available.

**FRNBES Prey Data** Best Available Scientific Information on Nesting Bald Eagles at Holmberg

FRNBES has conducted thousands of hours of scientific study on nesting and winter roosting bald eagles in the northern Front Range since 2015. Our studies and data have a rigorous methodology and QA/QC procedure, and we are currently preparing two manuscripts for peer-reviewed, scientific journal submittal. All of our underlying data and methodology is available to be shared.

Prairie dogs are the dominant identified prey source at the three nests in our study area that are distal to waterways and numerous ponds including Stearns (32.7% prairie dogs) and the Hygiene nest (42.3% prairie dogs)(figure 1; table 1). The FRNBES dataset also documents the importance of prey recovery from habitat less than ½ mile of bald eagle nests. Prey retrieval at ½ mile from all five nests range from 23 to 46%. Fish are the dominant prey source at 2 of the 5 nests that are in close proximity to waterways with numerous ponds (BOCR and CR16.5; figure 1). The predominance of fish as prey at the two nests directly adjacent to numerous fishing ponds supports the importance of near-nest prey sources for nesting bald eagles in our study area.

FRNBES is not asking that BCPOS change NPD designations at the CHP. However, our data demonstrates the importance of near-source prey to the nesting bald eagles at Holmberg. Based on FRNBES data discussed above, the CHP draft plan, which allows unlimited removal of prairie dogs on MOA parcels, would likely interfere with normal feeding behavior of these nesting bald eagles, as they derive a minimum of 26.5% of prey (prairie dog dominant) within ½ mile of their nest. Section 9.1 of the 2017 Boulder County Cropland Policy states that “Boulder County and its agricultural tenants shall abide by all federal and state laws governing wetlands, wildlife, and plant species.” Boulder County residents vote for Commissioners that we trust will uphold and abide by these landmark policies. Abidance by laws is independent of fines, prosecution, or litigation. We ask that the Commissioners and POSAC uphold the language and mandates of the Boulder County Cropland Policy. An upper limit to prairie dog removal on MOA parcels at CHP must be set, with assurances that no more than 15% prairie dog removal will be exceeded.

Addendum: In addition to the 660 acres of NPD acreage at the CHP, BCPOS manages all 90 acres on the Trillium property, just northwest and adjacent to the CHP as NPD (figure 2). In 2020, prairie dogs were completely removed on 40 acres of the newly purchased private property just west and adjacent to the CHP (figure 2; private acreage with prairie dogs eradicated). Studies by FRNBES since 2016 document the resident nesting bald eagles commonly hunted on this previously prairie dog-rich parcel.

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**Walter Kramarz • Nederland**

11/8/2020 10:41:00 PM • comment # 45

Looks like business as usual and a 19th century conqueror mentality for BCPOS administration. Never mind that we're in a time of planetary life support systems collapse.

BCPOS senior staff is evidently oblivious to the 65% of wildlife wiped out since 1970, the current Sixth Great Extinction, and the ongoing ferocious annihilation of wildlife up and down the Front Range.

As a Boulder County resident and regular visitor to the Carolyn Holmgren "Preserve" (actually now a proposed Kill Zone), I'm sickened that my tax dollars are financing production of this "Management Plan Update" (more appropriately "Wildlife Slaughtering Proposal"), and the glaring BCPOS Administration bias in favor of cattle ranching and livestock feed production.

At this point, before this even comes before the Board, these BCPOS Administrators proposing this Kill Zone approach need to appear at a separate public hearing to face real questions from those who pay their salaries-- not just livestock interests clearly incapable of coexisting with native wildlife.

1. The current 40 acre Burrowing Owl-Prairie Dog HCA absolutely cannot be destroyed for livestock hay and pumpkins. Not acceptable. Appalling that it would even be proposed.

To the contrary, that 40 acre HCA needs to be EXPANDED as there is obvious need for more living space for prairie dogs on those 40 acres, and their lives are being interfered with and disrupted by pumpkin patches and livestock feed production.

And rather than proposing prairie dog relocation, just relocate the pumpkin patches north towards E-470/ Dillon Road. Simple.

Query also whether burrowing owls are being driven away by those disruptive agricultural activities and overall lack of living space.

Doubling this HCA size to at least 80-120 acres is the right step forward in enhancing our public property to allow native wildlife including the keystone species prairie dogs to thrive without interruption.

2. Invasive/Introduced Species (European Cattle) poorly adapted to Colorado conditions need to exit the Holmgren Preserve in phased No Cattle Area designations, as they consume excess grasses and scarce water, and inevitably result in destruction of native resident wildlife. Let the land and degraded water quality recover from cattle waste and grassland devastation.

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Cattle exiting will also benefit prairie wildlife, as prairie dogs eat about 7 pounds of forage per MONTH, versus cattle that eat 26 pounds of forage per DAY.

3. Contrary to "think globally and act locally," BCPOS Administration is keen to pile on and exacerbate the following abominable trends, and the elected Board needs to halt it:

A. Livestock now account for 96% of Mammal biomass on Earth;

B. Livestock and their byproducts account for over 50% of global greenhouse gas emissions;

C. Over 30% of Earth's ice-free surface is expended on livestock production;

D. Prairie dogs have been annihilated from 95-98% of their range, and we're now hellbent on wiping out the pitiful remnant survivors.

It's past time for a serious and inclusive public dialogue on retiring and buying out public lands leasing to parties and unsustainable users who can't peacefully coexist with native wildlife and limited water and native grasses.

We've seen with COVID-19 the surge in wildlife population restoration that can happen when exploitative land uses and destructive activities are suspended. Let's rewild the Holmgren Preserve so that it actually lives up to its "Preserve" name, and we can promote not only prairie dogs, but raptors, fox, deer, coyotes, bobcats, burrowing owls, soil health, and the entire biotic community.



#45

frnbes\_dana\_bove\_mcr

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**Tamar Krantz • LOUISVILLE**

11/8/2020 8:55:00 PM • comment # 44

Boulder County Open Space Staff,

Thanks for considering my comments for your presentation to the Parks & Open Space Advisory Committee this month. CHP is my favorite of all of Boulder County's open space properties and I visit frequently.

I am very much opposed to the addition of a parking area at the south end of 104th street. The plan states that expanding the current parking area is not ideal because of existing wetlands. A parking area at the south end of 104th street would be just as bad or worse for wildlife and visitors. First this would create a conflict with pedestrians. 104th street has very little traffic and is currently used by pedestrians as part of the approximately one and a quarter mile loop around the agricultural fields to the south of

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Stearn's lake and by pedestrians accessing Josh's pond from Stearn's lake. Second, traffic would disturb the great horned owls that sleep in the cottonwood at the end of 104 street. It also moves construction and traffic closer to the Cradleboard trail area where burrowing owls and bald eagles have nested in past years. It is not worth the risk to the species that make the CHP the gem that it is. The best solution is not adding additional parking. The trailhead at Stearn's lake is accessible by bicycle from new paths at the Colorado Tech Center. Open Space staff should do more to promote visitation by bike and less to promote cars. Only on a few occasions during the initial COVID lockdown have I seen the parking lot full and overflowing. there is already adequate parking along the fence for the few equestrian users. I strongly disagree that more parking is needed.

I also urge you to maintain the 40 acre prairie dog/burrowing owl preserve. It is still possible that burrowing owls with diminished habitat on the front range will need to return to this area. I have also seen the bald eagles perched in this area. I don't believe that anyone understands the bald eagles' behaviors well enough to declare this hunting ground non-essential to them.

Finally, I am so happy to read that CHP supports northern leopard frogs. Please prioritize protection of this endangered species over accommodating livestock grazing in riparian areas.

Thankyou for considering my comments.

Tamar Krantz

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**Doug Grumann • Broomfield**

11/8/2020 8:45:00 PM • comment # 43

It is obvious from the many comments that people would like to see the natural ecosystems be the focus of the Carolyn Holmberg Preserve. I support that perspective. The draft report has many good points and I think the primary problem with it is just a little too much focus on Rock Creek Farm. While everyone would like to see the farm stay in the Preserve, I think it is time to consider reducing its footprint.

The report honors the indigenous native American people who were the original settlers of this area. Prairie dogs and the native human population co-existed well, and was the extreme changes in land use by settlers that impacted the ecology. This Preserve can become a showcase for implementing farming practices that allow native wildlife to co-exist and prosper.

quoting from this reference:

<https://www.nwf.org/Magazines/National-Wildlife/2001/Learning-to-Live-With-Prairie-Dogs>

"We asked, 'If you get rid of prairie dogs, how much forage do you gain?' The answer was about four to seven percent," says Uresk. "It does impact the rancher in dollars and cents." But the costs of poisoning prairie dogs (borne largely by the federal government) outweigh the gains made by eliminating the

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animals. Because the government pays, however, "Ranchers think, – 'Why not poison them if it's free?'" he adds.

It may be expensive for Boulder County to maintain No Prairie Dog fields surrounding the field 7 colony. Some of those NPD fields are already fallow - consider taking some of them out of cultivation and off of NPD status, and then use the money formerly spent to limit the colony spread to restore a more natural ecosystem in those fields allowing the colony to thrive.

see also:

<https://nationalzoo.si.edu/conservation-ecology-center/news/ecologists-dig-prairie-dogs-and-you-should-too>

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**Al Backlund • Lafayette**

11/8/2020 8:35:00 PM • comment # 42

I have been a volunteer in the Front Range Nesting Bald Eagle Studies group for two years. During that time I have observed nesting eagles lay and hatch their eggs, rear their eaglets to maturity and watched the young eagles develop their flight and hunting capabilities to a point where they leave the nest. It is inspiring and reassuring to observe these magnificent creatures as they build their nests to raise their young and increase their population in the front range.

Boulder County and particularly the Carolyn Holmberg Preserve is not an ideal habitat for these raptor families. It has an arid climate and limited food supplies and CHP is surrounded by ever increasing development that eliminates many of the remaining prairie dog and fish food sources. During the eaglet rearing period I have, on several occasions, observed the adult eagles return to the nest with food to feed themselves and the eaglets. The predominant food that I have seen them return to the nest with are prairie dogs.

I am requesting that BCPOS set limits on the elimination of prairie dogs within a half mile radius of the CHP eagle nesting area. Prairie dogs are the predominant food source for the eagles and other raptors in the CHP and any elimination of the prairie dog colonies creates a severe hardship for the birds. We are fortunate to have these majestic birds in our midst and should take reasonable steps to support their existence. I understand why prairie dog colonies are very undesirable in populated areas but the CHP is a preserve and allowing the colonies to survive as the primary food source for the eagles must be considered.

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**Georgia Lopez • Longmont**

11/8/2020 4:15:00 PM • comment # 41

Hello,

I live in Boulder County and conduct wildlife surveys for federal, state, and private sectors including Front Range Nesting Bald Eagle Studies detailed reports of eagles within the Front Range. If BCPOS's draft plan for Carolyn Holmberg Preserve were to be implemented as is, it would diminish the Stearns

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eagles main food source while also eliminating any chance of the preserve providing suitable habitat for burrowing owls.

Human activities have taken a major toll on burrowing owl populations and we must plan accordingly to prevent further decline and conserve the little habitat that is still left in Boulder County. To provide suitable habitat for burrowing owls, the management plan should not include No Prairie Dog areas. Please reference Figure 1 in the attachment. This figure is a map of existing and proposed trails with 200 meter buffers around them. Nesting burrowing owls within these buffers would require closure of the nearest trail. Active burrows in cross-hatched areas would require two trails at once to be closed until CPW's recommended season end date of October 31st.

To avoid removing one of the primary prey bases for federally protected bald eagles, the areas designated as Habitat Conservation Area's need to have suitable prairie dog abundance. Figure 2 shows the type of prey by percentage captured by this year round resident eagle pair. This figures shows that prairie dogs are the largest known source of food for the Stearns eagles and their young. Also note that more than a quarter of the prey captured was within a half mile from their nest. This near nest food source is crucial, especially when rearing young eaglets.

BCPOS's management plan for Carolyn Holmberg Preserve must consider all the details of both the present and what the future holds for the wildlife that inhabits here. Otherwise this preserve will no longer maintain species diversity.



#41-Lopez  
 CHP-comments\_1108

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**Toby Blauwasser • Hygiene**

11/7/2020 11:00:00 PM • comment # 40

Dear Sir or Madam,

I vehemently oppose your plan to kill and relocate prairie dogs to make room for grazing and growing hay and pumpkins.

Boulder County already designates 72% of their grasslands to No Prairie Dogs (NPD) and it is essential that you maintain the 4.8% of Habitat Conservation Areas (HCA) lands where our wildlife is protected.

Habitat conservation for native species, such as prairie dogs is more important than growing pumpkins and hay.

If vegetation is the main concern on some of these lands, cows should be removed and the land should be reseeded with native plants to support the keystone prairie dogs.

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Removing prairie dogs from HCA acres and from a burrowing owl preserve is detrimental to Boulder's prairies, raptors, fox, coyotes, bobcats, burrowing owls, educational opportunities, soil health, entire biotic community and the values of Boulder's residents.

Therefore, I ask that you maintain the HCA areas and support the prairie dog communities on these lands.

Respectfully,

Toby Blauwasser

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**Ruby Bowman • Longmont**

11/7/2020 2:59:00 PM • comment # 39

The following are my comments regarding the draft plan for Carolyn Holmberg Preserve at Rock Creek.

1. Prairie Dog Management:

In the draft plan, the Boulder County Open Space (BCPOS) department proposes to limit, reduce, decrease densities, remove, and thin prairie dog colonies in Multiple Objective Areas (MOAs), Habitat Conservation Areas (HCAs) and critical wildlife habitat at the Carolyn Holmberg Preserve at Rock Creek Farm (CHP/RCF). In No Prairie Dog Areas (NPDs), which are a majority of acres at CHP/RCF, prairie dogs will be routinely removed from these properties by lethal control or other removal methods that will result in the death of prairie dogs. It seems as if every site at the Holmberg Preserve will have some type of prairie dog removal. To me, the prairie dog management section of the draft plan is no more than a prairie dog elimination plan (a.k.a. lethal control plan)

Parks and Open Space says it will relocate prairie dogs from field 7 (the Prairie dog preserve and critical wildlife habitat) to other county Parks and Open Space properties, but I am skeptical of POS's promise. Boulder County kills thousands of prairie dogs each year on its open space properties. In years past residents have urged Parks and Open Space staff to relocate displaced open space prairie dogs, but staff's usual response is there are no suitable receiving sites available on county open space properties for prairie dogs. As of October 27, the Parks and Open Space (POS) department has not performed a prairie dog count for field 7. The number of prairie dogs living on this property, a 40 acre preserve on the north end of Rock Creek, could be in the high hundreds (if you use 20 prairie dogs per acre in the calculation).

Does Parks and Open Space really intend to relocate prairie dogs from field 7 or is it a smokescreen to mislead the public into believing hundreds of prairie dogs will be relocated when only as few as 25 prairie dogs will be actually relocated? Please clarify how many prairie dogs will be relocated from field 7.

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Grassland restoration is also being planned on Multiple Objective Areas (including field 65) and Habitat Conversation areas where active prairie dog colonies are present. Parks and Open Space staff usually remove prairie dogs from properties undergoing vegetative restoration by lethal control. Thinning is a removal method that Parks and Open Space plans to “investigate” and employ. I could not find scientific research papers that focused on thinning as a removal technique nor did I see any references to research papers in the draft plan. I did, however, find Dr. John Hoogland’s research paper titled *Prairie Dogs Disperse When Close Kin Have Disappeared*.

Apparently the removal of close kin within a prairie dog familial group can disrupt the social structure of colonies and destabilize them, resulting in prairie dispersal to other areas. If POS carries out prairie dog thinning at CHP/RCF, it will only exacerbate the problem of dispersing prairie dogs onto private properties and NPDs. It is best to keep the colonies intact and re-vegetate habitat with prairie dog resilient plants.

Recommendations:

- Do not remove any prairie dogs in Field 7 or on MOAs or HCAs.
- Do not re-designate field 7 as a No Prairie Dog Area.
- Eliminate livestock grazing on grasslands instead of removing prairie dogs to improve the condition of the vegetation on MOAs and HCAs.
- Strike the recommendation to “thin” prairie dog colonies from the draft plan.
- Convert 40 acres of NPDs for a burrowing owl preserve and develop a burrowing owl management plan for the preserve.

John Hoogland’s research paper is titled *Prairie Dogs Disperse When Close Kin Have Disappeared*. The paper was published in *Science* magazine, Volume 339, March, 2013:

<https://static1.squarespace.com/static/5841a4e029687f506e15343d/t/58f53182b8a79bc54b4aeaac/1492464003489/Hoogland%2C+2013%2C+Prairie+dogs+disperse%2C+Science.pdf>

2. Bald Eagle Management:

The proposed recommendations in the prairie dog management section of the proposed draft plan do not support sustainable habitat for nesting Stearns Bald Eagles.

Fifty percent of the food source for the Bald Eagles at Holmberg is derived from an area within a half mile of the nest, according to observation data collected over a number of years by Front Range Nesting Bald Eagles Studies. The primary food source for the Stearns eagles are prairie dogs. In spite of this, Parks and Open Space proposes to remove prairie dogs from properties (MOAs, HCAs, and NPDs) at the Carolyn Holmberg Preserve.

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The Bald Eagle is a Boulder County and Colorado Species of Special Concern and is designated as a species of greatest conservation need in the State Wildlife Action Plan. A site specific management plan should be developed for the Stearns Bald Eagles that includes the following:

- Close trails when they impact nesting Bald Eagles.
- Installation of a sturdy artificial nest platform in a suitable tree.
- Eliminate the prairie dog take and/or impose an upper limit for the percentage of prairie dogs that can be killed on MOAs and HCAs. As it stands now, POS can remove or kill 99% of a prairie dog population on a MOA.
- Convert NPDs in close vicinity to nest perches to HCAs.
- Do an annual assessment by a certified arborist regarding the health of the cottonwood trees.

A management plan is essential to ensure the Stearns Bald Eagles have sustainable eagle habitat at CHP/RCF for years to come. As it stands now, the prairie dog management proposals in the plan are detrimental to the Eagles, like the culling of its primary prey, the black-tailed prairie dog. POS's eagle action team is not a substitute for a site specific Bald Eagle management plan at the Carolyn Holmberg Preserve.

3. Water Quality:

Water quality concerns at the Holmberg preserve were raised on page 21 of the report: "Over the last decade, there has been a noticeable die-off of plains cottonwood trees throughout the property. The mortality is not limited to old trees but affects trees of all age classes, which raises concern that there may be a water quality issue."

Municipalities of Boulder County conduct ongoing water quality monitoring of streams through the Keep It Clean Partnership (KICP). Boulder County Parks and Open Space (BCPOS) department does not participate in KICP program nor does BCPOS have a formal water quality program to assess the health of waterways in open space properties, including in Carolyn Holmberg Preserve.

Rock Creek water samplings taken outside of Carolyn Holmberg Preserve have shown that low levels of dissolved oxygen in the creek do not meet the stream standard of 5.0 mg/L (Keep It Clean Partnership KICP 2018 Water Quality Analysis)." Rock Creek also was "identified in need of additional monitoring and evaluation to determine impairment for E. coli (KICP 2017 Water Quality Analysis)." It is very likely that section of Rock Creek running though the Carolyn Holmberg Preserve has the same water quality issues as other sections of the creek, including elevated E. coli levels.

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Since the Rock Creek/Buffalo Gulch (#78) area is listed as critical wildlife habitat in the Environmental Resources Element of the county Comprehensive Plan, Parks and Open Space should make every effort to ensure Rock Creek has good water quality to support wildlife species and cottonwood trees.

Recommendation: The Boulder County Parks and Open Space department should join the Keep It Clean Partnership effort, do regular water sampling and monitoring of Rock Creek within the Carolyn Holmberg Preserve, and share its data with KCIP.

4. Livestock Grazing:

Livestock grazing should not be allowed at the Carolyn Holmberg Preserve. POS staff blame prairie dogs for the condition of the vegetation on open space properties at CHP/RCF, but cattle grazing has been documented to have negative impacts on grasslands and riparian areas. Before removing prairie dogs (a keystone species and an important prey for the Stearns Bald Eagles) on MOAs or HCAs, livestock grazing should be eliminated at CHP/RCF, especially in riparian areas.

BCPOS allows livestock grazing and access to stream water at the Buffalo Gulch and Rock Creek area, which is designated as critical wildlife habitat #78. The definition of critical wildlife habitat in the comprehensive plan is: An area of unique habitat which has a crucial role in sustaining populations of native wildlife and in perpetuating and encouraging a diversity of native species in the county. The area maybe significantly productive habitat or particularly vital to the life requirements of species that are critically imperiled or vulnerable to extirpation. Riparian areas also cover only 2% of Colorado, but they are used by 90% of Colorado's wildlife at some point in their lives (per BCPOS).

Cattle are not critically imperiled or vulnerable to extirpation. Riparian areas should be for our wildlife, not for livestock to graze or to have access to stream water. Allowing livestock to graze in riparian areas is mismanagement of open space.

Recommendation: Eliminate livestock grazing at CHP/RCF.

Thank you for considering my comments.

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**Elizabeth Watts • Boynton Beach**

11/7/2020 2:24:00 PM • comment # 38

Boulder County Parks & Open Space (BoCo POS) is once again proposing the killing of a keystone species of a critically endangered ecosystem for agriculture. Agriculture is another extraction industry, as damaging or more than oil & gas. They are intertwined with & dependent on each other. Agriculture extracts the soil microbiome along with countless native species to grow one species of plant or animal to make more humans & their domesticated animals. In this arid Colorado climate, extracting/stealing water from struggling watersheds for irrigation is required for industrial agriculture.

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And to slaughter a keystone species to facilitate this is just plain wrong. Be on the right side of history and stop destroying our ecosystem.

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**Kenneth RAMSEY • Parker**

11/7/2020 3:23:00 AM • comment # 37

Destruction of prairie habitat has gone way too far. Allowing agriculture on public land is wrong. Prairie Dogs and the ecosystem they support are far more important and far more beneficial uses of prairie land than agriculture. After living in Colorado nearly all of my life I am shocked and disappointed by this practice of allowing agriculture on public land! I oppose this plan!

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**Diane Kristoff • Loveland**

11/6/2020 8:22:00 PM • comment # 36

As a volunteer wildlife biologist with Front Range Nesting Bald eagle Studies I have been part of collecting data with strict guidelines on bald eagle nests for over four years. The bald eagles now nesting at CHP had to move their nest due to human development and need protection as there are not many other suitable nest trees in the area as data obtained by FRNBES has shown. BCPOS should develop a management plan that ensures abundant prey resources for bald eagles and other raptors, not remove prairie dogs from HCA habitat. Also, there should not be any construction of trails, parking lots, etc. within the CPW suggested buffer of 1/2 mile from the bald eagle nest. The decision by BCPOS to close the cutoff trail should be extended to year round until the bald eagles are no longer using the nest at any time. I feel there is enough access for visitors to CHP. As one of the fastest growing portions in one of the fastest growing states, we should let the eagles and resident wildlife continue to prosper in the relatively small CHP. BCPOS should make a commitment to communicate with not only CPW and USFWS, but also FRNBES, which has year round data on eagles, not just part of the year. We also collect data on post-fledge dependence, early nest building, resource needs, reproductive activity, and human activity within 1/2 mile of the nest. BCPOS should actively consult with FRNBES regarding any decision that may affect the bald eagles, as Broomfield county does. Lastly, regarding your data on bald eagles produced on or near open space, it should be considered that there have not been any new nests since 2014 according to winter raptor counts. We may be doing something wrong, and should do all we can to protect the eagles that we do have.

Thank you for considering my comment.

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**Ann Tagawa • Boulder**

11/6/2020 6:39:00 PM • comment # 35

I am writing in regard to the management plan that proposes conversion of land at the Carolyn Holmberg preserve to agricultural use. I strongly oppose this plan and urge you to maintain the HCA as designated and support the prairie dog communities and related wildlife that depend on them there.

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**Janet Kern • Broomfield**

11/6/2020 4:40:00 PM • comment # 34

My kitchen window looks out over the Carolyn Holmberg Preserve, so I have observed the nesting Bald Eagles' activities for ten years. I have watched them have to move their nest from near the railroad track, to alongside Rock Creek Trail, and now along the Mary Martin Trail. Obviously, they are struggling to find a decent Cottonwood Tree in a location where they have plenty of room to fly for nest-stick collection, and plenty of prairie dogs to feed on. I started working with the Front Range Nesting Bald Eagle Studies to learn more about eagles. FRNBES has recorded thousands of hours of observations of these birds, my hours as well as many others'. After reviewing the CHP Draft Management Plan, FRNBES requests that BCPOS develop a management plan specifically for the Bald Eagles at CHP, as required by the BCPOS Cropland Policy (2017). This plan should include signage to keep recreational users out of sensitive areas, yearly meetings with power companies to assess electrocution risk from nearby power lines, and contingency plans for trail closure depending on the eagles' nest-site selection and timing of reproductive activity. The trail closure should stay in effect until the juveniles from this nesting pair have left the Preserve. Thank you for these considerations.

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**Jan Kardatzke • Broomfield**

11/6/2020 4:38:00 PM • comment # 33

I work as a volunteer for Front Range Nesting Bald Eagle Study who has reviewed the draft management plan for Carolyn Holmberg Preserve. The following recommendation is based on thousands of hours of observation both at the Preserve and all along the Front Range.

Modification: Any new construction projects, including new trails and parking lots should follow Colorado Parks and Wildlife's 2020 Raptor Recommendations. Specifically, no construction should occur within 1/2 mile of a Bald Eagle nest that is currently inhabited or has been inhabited in the previous five seasons.

As a volunteer observer for FRNBES I have studied the data, read the draft plan for Carolyn Holmberg Preserve and witnessed the effect of even a simple trail closure on Bald Eagle nest building and courtship. With the trail closure at Holmberg in mid October, their behavior went from limited nest building and activity in the nest tree, to full on building, spending more time in and near the nest, and other courtship behaviors. Therefore, I support this important modification to the management plan.

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**Mary Dichtl • Longmont**

11/6/2020 6:10:00 AM • comment # 32

Please don't kill and/or remove the prairie dog colonies at the Carolyn Holmberg Preserve at Rock Creek Farm for agriculture. This area is a beautiful open space and should be left that way and not disturbed. The Boulder County Comprehensive Plan defines open space as those lands intentionally left free from future development. I drove to and from work for the last 12 years past the C.H. Preserve and it was the one stretch of beauty along the Highway 287 corridor that I looked forward to seeing every day. The scenic vista of the mountains, the colors of the sunrises and sunsets, and the calm, peaceful existence of

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the prairie dog colonies and other prairie animals filled my heart everyday. Please don't change that for agriculture!!

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**Valentina van dijk • Noordwolde**

11/6/2020 1:39:00 AM • comment # 31

PLEASE STOP THE CRUEL PRAIRIE DOG KILLING PLAN!!!

These precious animals have every right to live!! This plan is extremely evil and cruel, a total disgrace to our civilization!!

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**Janine Kondreck • Denver**

11/5/2020 5:56:00 PM • comment # 30

Since Boulder County designates 72% of their grasslands to No Prairie Dogs (NPD) and it is essential that you maintain the 4.8% of Habitat Conservation Areas (HCA) lands where our wildlife is protected.

Habitat conservation is more important than growing pumpkins and hay!

If vegetation is the main concern on some of these lands, cows should be removed and the land should be reseeded with native plants to support the keystone prairie dogs.

Removing prairie dogs from HCA acres and from a burrowing owl preserve is detrimental to Boulder's prairies, raptors, fox, coyotes, bobcats, burrowing owls, educational opportunities, soil health, entire biotic community and the values of Boulder's residents.

PLEASE MAINTAIN THE HCA AREAS AND SUPPORT THE PRAIRIE DOG COMMUNITIES ON THESE LANDS!

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**Carolyn Elliott • Lafayette**

11/5/2020 5:50:00 PM • comment # 29

Please, do not destroy the 40-acre, burrowing owl preserve, one of the very few HCA acres in Boulder County, or harm any of the land on the Carolyn Holmberg Preserve at Rock Creek in the name of irrigated croplands.

Attempting to relocate the prairie dogs ends up in their death most of the time. Relocation is cruel and unnecessary in this situation. Thinning other HCA areas of prairie dogs, the action which kills the animals, only to allow cattle to continue to graze because they are "easier to manage" is counter-intuitive. Cattle eat 26 pounds of forage a day, while prairie dogs consume seven pounds a month.

Claiming cattle will heal the prairies rather than a native keystone species is beyond illogical and counter to the science. Habitat conservation is far more important than growing pumpkins and hay. If vegetation is the main concern on these lands even within Boulder County, then cows should be removed and the land reseeded with native plants to support the keystone prairie dogs. Removing the

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prairie dogs is detrimental to Boulder's prairies, raptors, fox, coyotes, bobcats, burrowing owls, soil health, the entire biotic community, and educational opportunities.

Please, maintain the HCA areas in not only the Carolyn Holmberg Preserve, but in all of Boulder County, and support the prairie dog communities on these lands. Thank you for your consideration.

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**Viki Lawrence** • Louisville

11/5/2020 2:27:00 PM • comment # 28

It's not clear my letter has been included. Can you send me an email as to whether or not it has been attached?

Thank you,

Viki Lawrence

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**Nikki Nafziger** • Vallejo

11/5/2020 1:45:00 PM • comment # 27

I am vehemently opposed to the plan. Destroying the land for agriculture is unacceptable. Killing precious vital prairie dogs is out of the question/evil. Wild lands and Wildlife that depend on them must be left alone/intact/preserved; no exceptions. As a species we have already overdeveloped lands. We cannot continue down this destructive short sighted path. NO KILLING OF PRAIRIE DOGS!

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**Chris Pedone** • Golden

11/5/2020 12:51:00 PM • comment # 26

If you are truly concerned about keeping vegetation thriving in this area, why are you allowing the grazing of cows in this area? They consume much much more vegetation than do prairie dogs. Also, these are Native species. You claim to respect Native people, but do not back up that claim by exterminating another Native species. These animals are an important part of the whole ecosystem and are far more important than growing pumpkins. This is a flawed plan. The citizens must also be allowed to present facts that show the detrimental effects of this plan in order for the consideration to be fair. Thank you- Chris Pedone-Golden Colorado

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**johanna stone** • Kailua

11/5/2020 12:39:00 PM • comment # 25

This plan does NOT support the rapidly dwindling biotic communities on which ALL of life depends.

Boulder County designates 72% of their grasslands to No Prairie Dogs (NPD) and it is essential that you maintain the 4.8% of Habitat Conservation Areas (HCA) lands where our wildlife is protected. This 4.8% is such a small area of natural prairie dog habitat. We should maintain this percentage and eventually increase it.

Habitat conservation is more important than growing pumpkins and hay. PERIOD.

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If vegetation is the main concern on some of these lands, cows should be removed and the land should be reseeded with native plants to support the keystone prairie dogs. Because of this clear contradiction, it seems just to be just an excuse to be violent to our dear prairie dog relatives.

Removing prairie dogs from HCA acres and from a burrowing owl preserve is detrimental to Boulder's prairies, raptors, fox, coyotes, bobcats, burrowing owls, educational opportunities, soil health, entire biotic community and the values of Boulder's residents. We must respect our animals relatives, for they are the original residents of these lands.

I demand we MAINTAIN the HCA areas, and eventually INCREASE THEM and support the prairie dog communities on these lands. Because they were here far before any humans. We owe it to all our relatives to steward them into abundance because each link in the Web of Life is crucial to all of our thriving. Maintaining our ecosystems and the health of our relatives is crucial for our own health and is actually our responsibility as humans here on our Mother Earth.

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**James Brown • LOS ANGELES, CA**

11/5/2020 12:30:00 PM • comment # 24

1. Boulder County designates 72% of their grasslands to No Prairie Dogs (NPD) and it is essential that you maintain the 4.8% of Habitat Conservation Areas (HCA) lands where our wildlife is protected.
  2. Habitat conservation is more important than growing pumpkins and hay.
  3. If vegetation is the main concern on some of these lands, cows should be removed and the land should be reseeded with native plants to support the keystone prairie dogs.
  4. Removing prairie dogs from HCA acres and from a burrowing owl preserve is detrimental to Boulder's prairies, raptors, fox, coyotes, bobcats, burrowing owls, educational opportunities, soil health, entire biotic community and the values of Boulder's residents.
  5. Ask that they MAINTAIN the HCA areas and support the prairie dog communities on these lands.
- 

**Nora Scanlon • Erie**

11/5/2020 11:38:00 AM • comment # 23

This plan does NOT support the rapidly dwindling biotic communities on which ALL of life depends. You write, "Parks & Open Space appreciates the thriving and diverse indigenous communities in Boulder County today and acknowledges our need to build stronger relationships with local indigenous people and tribal governments in order to promote their legacy of occupation on the lands our department is charged with managing on behalf of the residents of Boulder County." However, you want to "thin" prairie dogs and allow cattle to graze? Cattle are not indigenous, yet prairie dogs are. You can not state your appreciation and respect for indigenous people, animals and life, yet at the same time create a plan

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which destroys their life. As a child we are taught that actions speak louder than words. Your words say one thing, but your actions say another. Boulder County designates 72% of their grasslands to No Prairie Dogs (NPD) and it is essential that you maintain the 4.8% of Habitat Conservation Areas (HCA) lands where our wildlife is protected. Removing prairie dogs from HCA acres and from a burrowing owl preserve is detrimental to Boulder's prairies, raptors, fox, coyotes, bobcats, burrowing owls, educational opportunities, soil health, entire biotic community and the values of Boulder's resident.

I ask that you MAINTAIN the HCA areas and support the prairie dog communities on these lands.

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**David Auerbach • Lyons**

11/5/2020 11:35:00 AM • comment # 22

Your plan goes on to propose multiple different Habitat Conservation Areas to be "thinned" of prairie dogs by trapping and relocating and to allow CATTLE to continue to graze because they are "easier to manage" than prairie dogs. Keep in mind 1 cattle eats 26 pounds of forage a day while one prairie dog consumes 7 pounds of forage per month. The idea that the cows are better at healing prairies than a native keystone species is ludicrous.

On the 26,668 acres of Boulder County Public Land, only 2,944 acres have prairie dogs. Only 1,256 of those acres are HCA's designated to protect prairie dogs. The county now wants to destroy 40 of those HCA acres which were designated as a Burrowing Owl preserve and to start disrupting additional HCA areas that were specifically designated for the protection of prairie dogs by "thinning" the populations through the torturous procedure of relocating these animals into the territory of other prairie dogs where they will most likely have a low survival rate. At the very least, they will be separated from their land and their communities and traumatized for pumpkins, hay, and cows. This does NOT support the rapidly dwindling biotic communities on which ALL of life depends.

Further points:

1. Boulder County designates 72% of their grasslands to No Prairie Dogs (NPD) and it is essential that you maintain the 4.8% of Habitat Conservation Areas (HCA) lands where our wildlife is protected.
2. Habitat conservation is more important than growing pumpkins and hay.
3. If vegetation is the main concern on some of these lands, cows should be removed and the land should be reseeded with native plants to support the keystone prairie dogs.
4. Removing prairie dogs from HCA acres and from a burrowing owl preserve is detrimental to Boulder's prairies, raptors, fox, coyotes, bobcats, burrowing owls, educational opportunities, soil health, entire biotic community and the values of Boulder's residents.

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5. Ask that they MAINTAIN the HCA areas and support the prairie dog communities on these lands.

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**Alicia Robb • Colorado, USA**

11/5/2020 11:21:00 AM • comment # 21

1. Boulder County designates 72% of their grasslands to No Prairie Dogs (NPD) and it is essential that you maintain the 4.8% of Habitat Conservation Areas (HCA) lands where our wildlife is protected.

2. Habitat conservation is more important than growing pumpkins and hay.

3. If vegetation is the main concern on some of these lands, cows should be removed and the land should be reseeded with native plants to support the keystone prairie dogs.

4. Removing prairie dogs from HCA acres and from a burrowing owl preserve is detrimental to Boulder's prairies, raptors, fox, coyotes, bobcats, burrowing owls, educational opportunities, soil health, entire biotic community and the values of Boulder's residents.

5. Ask that they MAINTAIN the HCA areas and support the prairie dog communities on these lands.

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**Judy Greenfield • Denver**

11/5/2020 11:13:00 AM • comment # 20

I am opposed to killing prairie dogs in order to farm their land. Black tailed prairie dogs once called much of Colorado home and have been extirpated through gassing, destruction of habitat, plague (introduced from humans, from Asia) and hunting. 98% have been destroyed due to human hubris. To kill prairie dogs is morally and environmentally reprehensible.

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**Tetyana Vardzik • Centennial**

11/5/2020 10:57:00 AM • comment # 19

1. Boulder County designates 72% of their grasslands to No Prairie Dogs (NPD) and it is essential that you maintain the 4.8% of Habitat Conservation Areas (HCA) lands where our wildlife is protected.

2. Habitat conservation is more important than growing pumpkins and hay.

3. If vegetation is the main concern on some of these lands, cows should be removed and the land should be reseeded with native plants to support the keystone prairie dogs.

4. Removing prairie dogs from HCA acres and from a burrowing owl preserve is detrimental to Boulder's prairies, raptors, fox, coyotes, bobcats, burrowing owls, educational opportunities, soil health, entire biotic community and the values of Boulder's residents.

5. Please MAINTAIN the HCA areas and support the prairie dog communities on these lands.

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**Lisa Goodrich • Boulder**

11/5/2020 10:54:00 AM • comment # 18

Not many people have jobs where they make life and death decisions. You do. I am against killing prairie dogs for the Carolyn Holmberg Preserve at Rock Creek. It isn't a preserve if you're killing wildlife.

Your memo states the plan for the in-burrow lethal control of prairie dogs. Everywhere else in your document you speak of “humane lethal control.” Gassing prairie dogs in their burrows where they can suffer for hours and in some cases days, is not humane.

Gassing has been banned by the Geneva Convention but we see fit to use it on wildlife. No one, including prairie dogs deserves to be gassed in their homes. Then there is the second wave of death that you are causing when coyotes, birds of prey like hawks, owls and others think they've got a free meal. This is a horrible way to die.

Speaking of which, this area is one of only a handful of locations that contains burrowing owls. These owls need prairie dog habitat to survive.

We are in the middle of the planet's 6th mass extinction. It is time we took a more active role to set things on the correct path. This involves helping prairie dogs not gassing them. Prairie dogs have already seen their population reduced by over 99% of their original numbers . Please do your part and protect this important keystone species.

I think we should be prioritizing wildlife and wild spaces over growing pumpkins and feeding cattle, which add to greenhouse gasses.

I would like to end with a quote from Ghandi, “The greatest of a nation and its moral progress can be judged by the way its animals are treated.” We have a long way to go. Please, let’s take a step in the right direction and end this attack on prairie dogs and our public land.

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**louis gauci • Newport**

11/5/2020 10:43:00 AM • comment # 17

Boulder County designates 72% of their grasslands to No Prairie Dogs (NPD) and it is essential that you maintain the 4.8% of Habitat Conservation Areas (HCA) lands where our wildlife is protected. Habitat conservation is more important than growing pumpkins and hay. If vegetation is the main concern on some of these lands, cows should be removed and the land should be reseeded with native plants to support the keystone prairie dogs. Removing prairie dogs from HCA acres and from a burrowing owl preserve is detrimental to Boulder's prairies, raptors, fox, coyotes, bobcats, burrowing owls, educational opportunities, soil health, entire biotic community and the values of Boulder's residents.

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I am kindly asking that you MAINTAIN the HCA areas and support the prairie dog communities on these lands.

Thank you for your attention and consideration.

Louis

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**Alexandria Beck • Denver**

11/5/2020 10:25:00 AM • comment # 16

I am writing to express my opposition to this plan that involves the killing of a keystone species of a critically endangered ecosystem for agriculture.

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**Doreen Mann • Lisbon**

11/5/2020 10:09:00 AM • comment # 15

When are people going to stop trying to kill prairie dogs??? I have been a huge fan of them and every year there is a big move to get rid of them. Man is going to destroy this planet and every thing on it . Give them a break and move them some where that they can live and have a family and multiply like any other animals . This is like Australia poisoning wild dogs . Just to do some thing more human and help them. Don't kill them

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**Kristan Pritz • Broomfield**

11/5/2020 8:40:00 AM • comment # 14

November 5, 2020

Dear Boulder County Parks and Open Space staff,

The Broomfield Open Space and Trails Advisory Committee (OSTAC) and Open Space and Trails staff commend Boulder County for their work on the thorough, in-depth DRAFT Carolyn Holmberg Preserve At Rock Creek Farm Draft Management Plan (DRAFT). We appreciate the extensive steps to provide outreach to Broomfield residents to make sure that our community is aware of this planning effort. Thank you also for attending our October OSTAC meeting to provide an overview of the DRAFT.

We appreciate your consideration of the following comments. We wish you the best with this management plan. Below are OSTAC's comments:

INTRODUCTION: DESCRIPTION OF PLANNING AREA

Page 7: The Carolyn Holmberg Preserve abuts CCOB property to the north too. Please note this in the first paragraph as it relates to a later comment about the proposed trail in this area.

INTRODUCTION: COLLABORATION

Page 11: Please note the meeting with OSTAC as we appreciated the Boulder County staff attending our meeting. It would also be nice to note the extensive notification that Boulder County completed to make sure Broomfield residents were informed about the project.

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SOIL AND WATER RESOURCES

Page 16: It would be interesting to know a little more about what this sentence specifically means. “The BCCP designates much of the property as nationally or locally important agricultural land, a recognition of both suitable soils and adequate irrigation water.”

Page 18: Parrots Beak Pond: It is unfortunate to hear about all the trash in this drainage. Perhaps a joint Broomfield and Boulder County open space clean-up would be a good event once we can gather together again. Could this be listed as a recommendation for the Buffalo Gulch recommendations?

DESIGNATION AND USE OF 40-ARE BURROWING OWL PRESERVE AND FIELD 65

Page 41-42: Please make it more clear in the plan if the Field 7 acres are being replaced by Field 65 that can allow for prairie dogs. Could Field 65 be an area that is designated for prairie dogs without other agricultural uses such as grazing so that the loss of Field 7 is compensated for in respect to prairie dog habitat?

Page 41: If Field 7 is returned to a dryland crop field, the expense of undergrounding the utility line is avoided to allow for a pivot sprinkler. Please explain if this is a viable alternative plan for the site.

GRASSLAND RESTORATION

Page 43-45 Grassland Restoration (note this comment also relates to the sections on DESIGNATION AND USE OF 40-ACRE BURROWING OWL PRESERVE AND FIELD 65 and PRAIRIE DOGS):

Please clarify the existing acres where prairie dogs are allowed and the future acres designated for prairie dogs. The plan could benefit from this clarification as it is not clear if overall acres are proposed to be reduced. A map showing existing and proposed areas would be helpful. Please also confirm the existing and proposed acres of land devoted to farming and/or grazing.

OSTAC would like to see design alternatives that would avoid removing the existing prairie dog colony in Field 7. Relocation of that colony would cause inevitable loss, and we would like to see an analysis of how some neighboring fields perhaps to the north and east could be moved out of cultivation, allowing a more natural spread of the existing colony. Reducing the amount of cultivated land will reduce pressure on the irrigation systems and would make improvements more efficient by reducing the targeted area. We would also like to understand how prairie dog management is currently being conducted with respect to time and costs. Relocation of Field 7's 40 acres of prairie dog habitat into another suitable area of the Preserve is also an option that could be considered to compensate for the loss of Field 7. In summary, OSTAC would like to see a plan that scales farming acres back somewhat to preserve and restore more of the natural ecosystem to benefit the future. This plan, at a minimum, should maintain the number of acres currently allowed for prairie dogs and burrowing owl habitat.

Page 45: It appears that bullet #4. at the bottom of the page is missing a word -- we would suggest adding the word 'and' before 'prairie dog management'. Also, would it be possible to allow for restored

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grasslands without allowing for future grazing? Instead, this land could perhaps be designated for prairie dog habitat.

Pages 43-45: Is there more detail on how action items that note ‘reducing prairie dog populations’ and ‘keeping prairie dog densities low’ are being achieved? Questions on this topic could be expected as to how a targeted density is determined and how reductions in density are being carried out.

Page 30: What is the designation for the lands that are just west of 104th Street and south of the Northwest Parkway?

**PRAIRIE DOG MANAGEMENT**

Page 46: At the southwest corner of Lac Amora along Fields 53, 55, 56, and 57, please allow for consideration of the use of barriers to minimize expansion into the residential area to the east. Currently, prairie dogs have migrated into the Lac Amora area from the Preserve. The goal is to minimize future prairie dog management in this area and reduce conflicts with residents. Barriers are a helpful tool to have in the management tool box. Please provide a chart that shows the location and acres of where prairie dogs currently live now and where they will be allowed to be in the proposed management plan. A map showing pre- and proposed plan areas for prairie dogs would be helpful. It would be positive if the same number of prairie dog habitat acres are preserved in the new plan as currently exist. However, we would like to understand the acreage numbers more to see if this is a feasible request.

Page 46: Raptor poles could be added to areas where prairie dog populations are more dense to alleviate population pressures, while also supporting raptors’ needs for prey.

Page 46: At the top of the page, under objectives, could the 2nd bullet be revised to state, “Minimize potential for prairie dog encroachment onto adjacent private or public lands that are not HCA areas?”

**WILDLIFE CLOSURES OF THE REGIONAL TRAIL**

Page 50: Please note in the recommendation for the Cradleboard Trail from 104th St. West to Brainerd Drive (Green Trail) that the proposed trail will be offset from the property line by at least 75 feet and a prairie dog barrier is needed along the northern property fence line to minimize migration into the residential/agricultural properties to the north. This buffer area should be a NPD zone to avoid conflicts with the residential/agricultural properties.

Page 50: OSTAC is interested in understanding the floodway's potential impacts on the Green Trail and proposed trailhead just west of 104th. The proposed trailhead should be located out of the floodway if at all possible. (Comment is also listed under RECREATION below).

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Page 50: The orange proposed trail is a useful and positive option pending the analysis of environmental impacts.

Page 50: Please show the proposed trail in Recommendation 2 for the Cradleboard trail east of 104th so the proposal is more understandable. It is unclear where this alternative trail will be located without a map.

Page 50: Please provide a proposed trail map that shows the entire trail system for the property with the proposed trailheads, trails, etc.

**RECREATION, VISITOR ACCESS, AND ACCESSIBILITY**

Page 53: Please note that the final Brainerd trailhead location will be determined by Boulder County staff collaborating with Broomfield's Transportation Engineering Division, Open Space and Trails Department and adjacent residents.

Page 53: OSTAC is interested in understanding the floodway's potential impacts on the proposed trailhead just west of 104th. The proposed trailhead should be located out of the floodway if at all possible.

**CULTURAL AND PALEONTOLOGICAL RESOURCES**

Page 55: Please consider adding informational signage at the Preserve that acknowledges the native and indigenous people who once lived in this area. The acknowledgement in the Draft report is appreciated.

**AGRICULTURAL OPERATIONS USE OF HISTORIC BUILDINGS AND STRUCTURES**

Page 56: Please show a map of the historical structures and the proposed location in the north central area of the property for some of the agricultural operations.

**BUFFALO GULCH**

Page 58: Please add a recommendation about clean-up of the ponds and drainage area. Earlier in the document, the amount of trash is noted as a concern. This could be a nice opportunity for a joint clean-up project between Broomfield and Boulder County.

**BIRDS OF PREY FOUNDATION OPERATIONS**

Page 60: The Plan's recommendation to continue Boulder County's partnership and collaboration with the Birds of Prey is strongly supported. The recommendation to continue this work with the Birds of Prey is appreciated. Thank you for making it a priority to make sure this important non-profit has a home. It would be helpful to provide a map showing the relocation site area for the facilities. We commend Boulder County for seeking a new site that will protect the riparian zone and floodplain while providing a location for BOP facilities/operations.

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PLAN PRIORITIES

It is recommended that the Prairie Dog Management Recommendations 2, 3 and 4 related to barriers and the MOA/HCA be given high priority designations.

Thank you again for your collaboration with Broomfield!

Sincerely,

City and County of Broomfield Open Space and Trails Advisory Committee

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**Dana Bove • Boulder**

11/3/2020 2:09:00 PM • comment # 13

All decisionmaking regarding species of special concern at the CHPRCF – in this case nesting bald eagles – needs to be based on the best available science and information. The CHPRC draft management plan calls for no change in management with respect to the approximately 291 acres of MOA and 967 acres of NPD designated prairie dog habitat, much of which remains within ½ mile of 2019 and 2020 bald eagle nests on the Holmberg property. Furthermore, the draft plan will also allow for removal of prairie dogs from HCA habitat.

Concerning Nesting Bald Eagles--CORA Data on Prairie Dog Removal Near Bald Eagle Nest is Critical to Objectively Evaluate the Prairie Dog Policy at Holmberg

BCPOS has cited past bald eagle nest success as the primary justification for its draft prairie dog management plan at CHPRC (see CHP draft plan page 7). The implication is that the current management plan for prairie dog removal will not negatively impact the nesting eagles on the property. However, BCPOS has failed to provide any information or data on what this past management actually entailed near bald eagle nests that are on or adjacent to open space properties. The public cannot assess how future management decisions – specifically at Holmberg-- may be similar or different from past management practices, unless BCPOS specifically provides information on past prairie dog removal on properties within ½ mile of each of these bald eagle nests. Using past bald eagle nest success to justify current or anticipated prairie dog management is only valid if the majority of prairie dogs were in fact removed within ½ mile of most bald eagle nests on or adjacent to BCPOS properties. If such large removal around these nests was NOT the case, the BCPOS argument based on past prairie dog management near nests has no merit or justification.

Under the current prairie dog management policy, BCPOS and their tenants are allowed to remove up to 99.9% of all prairie dogs on MOA designated open space land. The public and stakeholders need to be assured that the CHPRC management plan includes an upper limit to the total of prairie dogs that can be removed on MOA land at Holmberg. Asking the public and stakeholders to simply trust that BCPOS at Holmberg will continue past prairie dog removal practices on other MOA lands – based on trust, not policy – is unreasonable, especially for a management plan that will likely persist for another 10 years.

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Fifty-eight of the 86 initially submitted public comments supported limits to removal of prairie dogs on MOA lands at Holmberg to ensure adequate prey for the nesting bald eagles and to support other raptors. The majority of those 58 commenters also supported all recommendations listed in the Eagle Environmental Inc (EEI) consulting report, including the following on MOA prairie dog management: “In order to improve the likelihood of a successful nesting at Perch D, manipulative kill of prairie dogs within that MOA should be reduced or eliminated and only reinstated if there are clear issues between prairie dog numbers and other resources in that MOA.”

As the director of Front Range Nesting Bald Eagle Studies (FRNBES), I agree with EEI’s recommendations pertaining to prairie dogs on MOA designated land at Holmberg. Not only has BCPOS ignored the majority of the initial 86 comments that concur with the EEI recommendations on prairie dogs, but BCPOS offers no substantiated information, data, or science on which to base its argument for keeping MOA designation at Holmberg unchanged.

FRNBES Prey Statistics Data – Local Scientific Data Demonstrating Critical Importance of Near-Nest Prey

FRNBES is attaching graphical results of prey retrieval statistics from our studies on 5 bald eagle nests that are on and in close proximity to the Holmberg preserve. Each of these nests were intensively studied year-round, with a specific focus during the post-fledge dependence to dispersal period (PFDD) – certainly marking the peak of prey retrieval through the year for each nesting pair. While we are still several months out from having a submitted manuscript for peer-reviewed publication, we are always amenable to including all underlying data.

The following prey statistics are directly pertinent to potential removal of as much as 99.9% prairie dogs on MOA land at Holmberg. If BCPOS cannot guarantee an upper limit of removal on MOA property at Holmberg, then it is reasonable for the public to assume that 99.9% will be the potential and actual removal limits.

From hatch to dispersal the following information can be derived from our graphical data attached:

- 1) Prey recovered less than 1/2 mile of these five nests from hatch to dispersal ranges from 23 to 46%
- 2) Prairie dogs are the dominant identified prey source at the three nests that are distal to waterways with numerous ponds (fish sources), including the Stearns and Hygiene nests.
- 3) Fish are the dominant prey source at 2 of the 5 nests that are next to waterways with numerous ponds (see nests on figure surrounded by green rectangle)
- 4) #3 supports point #1, both indicating that near-nest prey sources are vital for nesting bald eagles in our studies.

Details regarding attached figure:

All data represents prey retrieval from hatch to juvenile dispersal during time 2018 to 2020.

See figure below.



#13-Bove-frnbес\_pre  
y\_data.pdf

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**Sally Mohr • Broomfield**

11/3/2020 8:48:00 AM • comment # 12

I am totally in favor of the recommended new trails. These additional access points and connectors will allow visitors multiple options to enjoy this unique recreational area.

Trail closures during nesting season may be necessary but severely limits access of this open space.

Having these other proposed trail options allows trail access while still protecting wildlife.

This is the only open space for the thousands of residents in the Via Varra area. When trail access is restricted, for any reason, it severely impacts our access to this wonderful nature preserve. We need more trail options that will allow visitors to spread out and not create an overuse situation on those existing trails.

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**Birgitt BÄllhm • Forchheim**

10/31/2020 12:34:00 PM • comment # 11

Habitat conservation is more important than growing pumpkins and hay!

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**Brian Parkinson • Fun**

10/30/2020 11:24:00 PM • comment # 10

Put yourselves in their shoes/paws Keep them Alive

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**Michele Natalino • Lubbock**

10/30/2020 10:19:00 AM • comment # 9

It's a wildlife advocate and former animal control officer here in Texas, I'm pleading with you to preserve the wildlife in this preserve. So much of wildlife's habitat is being taken over to build malls, and other things that we already have too much of. it's a nature lover, I love to go and see wildlife anywhere I get the chance to. There was something peaceful and tranquil about going to nice quiet place and just being one with nature. Please don't take that away from the residents of Colorado. Thank you.

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**Kitty Brigham • Longmont**

10/29/2020 4:48:00 PM • comment # 8

Boulder Rights of Nature respectfully requests an extension of the comment submission period for the draft plan of the Carolyn Holmberg Preserve.

The reasons for the extension request are the ongoing issues facing us all: county wildfires and COVID; as well as specific stakeholder input that requires information that can only be obtained through CORA.

Yours,

Katharine Brigham

President, Boulder Rights of Nature, Inc.

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**Janis Lievens • Broomfield**

10/29/2020 10:34:00 AM • comment # 7

This property is a gem. The management plan needs to take into account all of the needs to optimize best use of this property so wildlife, agriculture, recreation, habitat and water are considered.

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**Deborah Suitor • Conifer**

10/28/2020 8:23:00 AM • comment # 6

You propose a "preserve" and yet plan on killing the creatures to create it. A bit odd, don't you think? Come on Boulder, your reputation has already gone so downhill over your total disregard for any life aside from supporting as much development as possible. Make the right decision this time and DO NOT sentence these creatures to death..allow them to be relocated.

Debbi Suitor

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**Mark Karpowich • Broomfield**

10/27/2020 6:44:00 PM • comment # 5

The future commercial and residential development that is coming to the Dillom Rd. corridor is very concerning to the impacts on one of the MOST precious areas of open space in East Boulder and Broomfield County. Don't pave the road. Don't cement the paths. Leave the eagles alone! Those farms are going to sell to developers when the old timers move on. SAVE THE OPEN SPACE AT ALL COSTS!!!

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**Leslie Gura • Chapel Hill**

10/24/2020 11:55:00 AM • comment # 4

I am just digesting this draft. The timeline is much too fast given the fire situation. Please extend this.

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**Daniel Rifkin • Denver**

10/24/2020 10:56:00 AM • comment # 3

Sirs and madams,

I was concerned to learn that part of the Rock Creek preserve which is inhabited by prairie dogs is being proposed for irrigated agricultural.

The plan says you will relocate these prairie dogs, and I know that this is challenging to find an area to do so. But I hope you will fulfill the aspirations of the plan to not kill these native creatures.

We can't just continue to poison and reduce prairie dog colonies on open space. It is time for Boulder county to balance the needs of agriculture in development with those of the wildlife that so many of us appreciate all around Boulder.

Thank you,  
Danny Rifkin

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**Dan Haught • Broomfield**

10/23/2020 11:15:00 AM • comment # 2

I am grateful that grassland restoration and Prairie Dog management is being addressed. For those of us who visit the property regularly, destruction of the native grassland due to Prairie Dog activity (along with the resulting soil erosion) is very apparent. While I don't believe anyone is advocating for

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destruction of the current Prairie Dog colonies, I believe that many residents support better management of this species.

As the report states, "the density of prairie dogs has reached a critical threshold and threatens the sustainability of grasslands." Indeed, a visit to the property confirms this. As such, I fully support the installation of additional fences, barriers, and relocation/removal of the species from the areas not designated as critical Prairie Dog habitat.

Thank you for your time.

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**Jeremy Gregory • Longmont**

10/22/2020 9:19:00 AM • comment # 1

As a 3rd generation Boulder County native that comes from a long line of eco-conscious farmers, conservationists and educators and as the executive director for a nonprofit that advocates for eco-social justice causes, I am vehemently opposed to the removal of prairie dogs from the Carolyn Holmberg preserve especially to make way for more agriculture. The county has more than enough agriculture land while the prairie dog; a vital keystone species is down to only 2% of its natural range.

In light of what the city of Boulder has voted on to kill thousands of prairie dogs, the last thing the county needs to be doing is killing even more. BOCO agriculture officials has a notorious history of utilizing a kill first mentality that is socially irresponsible. It's an antiquated lazy mindset that has adversely affected our ecological systems and the sentient beings within these habitats for the sake of outdated farming and ranching operations.

Boulder County should instead focus its energy and efforts on how to make better use of the ag lands it has in place rather than continue to uproot a native keystone species that supports over 100 other species.

This proposal put forward reeks of malpractice, immorality, ignoring science in the process. Personally and on behalf of my organizations followers and supporters, I implore the decision makers involved to reject this malfeasant idea and push forward more forward-thinking ideas that are grounded on ethics, morality and science.

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