CASE STUDY

Massacre for Sport:
Ending Unregulated Prairie Dog Hunts in Colorado's Protected Lands

Executive Summary

Across southeastern Colorado, outfitter-led prairie dog hunts have escalated into mass recreational killings —some boasting over 1100 animals shot in a single day. These hunts are marketed as "plague control" or "God's work," yet they lack scientific merit, ecological oversight, and ethical grounding. Worse, they often occur on federally managed lands like Comanche National Grassland, where CPW retains wildlife jurisdiction. This proposal outlines the ecological consequences, legal authority, and policy recommendations for CPW to curtail this practice through enforceable guidance.

The Problem: A Public Lands Crisis in Plain Sight

Across southeastern Colorado, a troubling trend has emerged on federally managed lands like Comanche National Grassland: outfitter-led prairie dog hunts that resemble mass extermination more than wildlife management. These events are not isolated incidents—they're coordinated, celebrated, and increasingly normalized through online communities and social media platforms. Facebook groups with thousands of members actively organize trips to Comanche, boasting kill counts in the hundreds per day, sharing photos of carcasses, and treating the practice as "live target practice" rather than ethical harvest.


Cowboy State Daily

Yes, Prairie Dog Hunting Guides Exist, And They Have A Robust Business

https://cowboystatedaily.com/2025/08/16/those-serious-about-plunking-prairie-dogs-hire-guides/

> *"They just want to come out and burn (gun) powder," he said. "Most of them are gun nuts. They'll have 20 rifles in the back of their truck and thousands of rounds."*

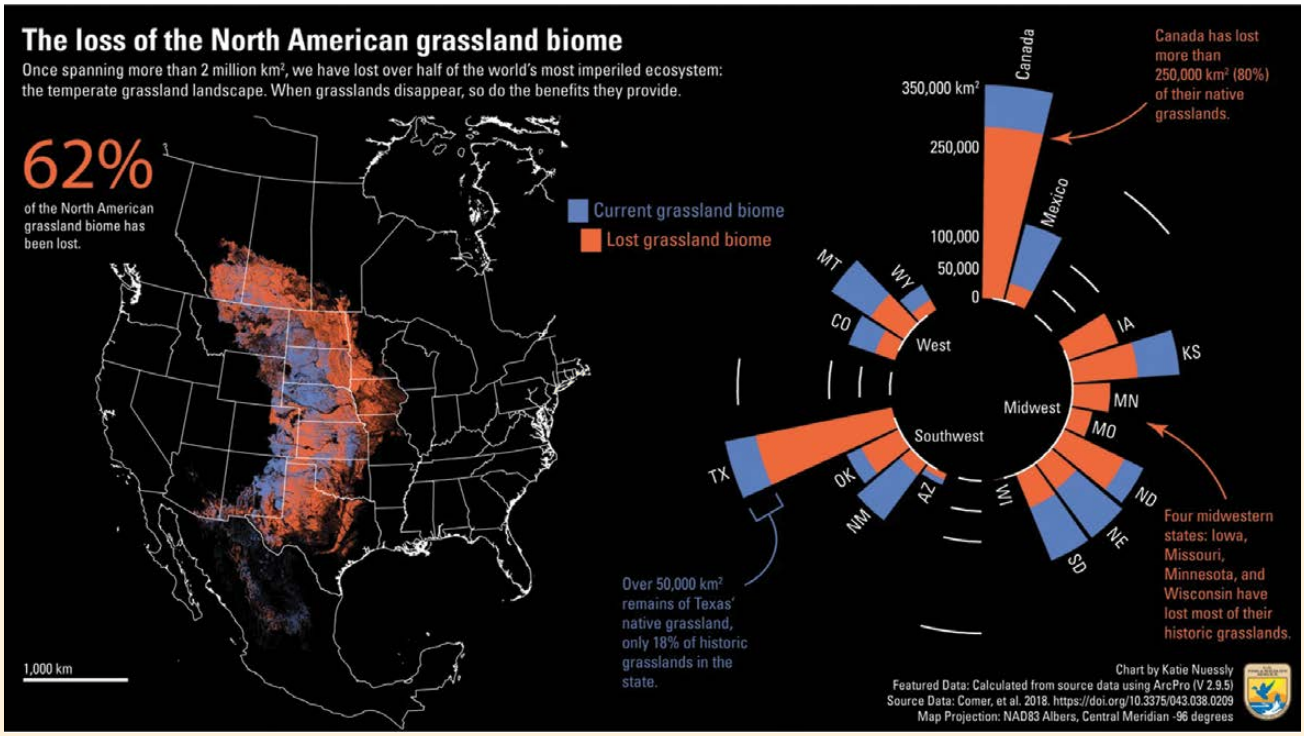
Public lands not private lands

This case study focuses exclusively on public lands across Colorado, with Comanche National Grassland serving as the focal case study, where wildlife is held in trust by the state and managed under the jurisdiction of Colorado Parks and Wildlife (CPW). It does not address private landowner decisions, nor does it challenge the rights of ranchers to manage prairie dogs on their own property. Instead, it scrutinizes the unchecked recreational killing of prairie dogs on lands meant for conservation, education, and public enjoyment.

Part 1: A keystone species in peril

Prairie dogs are not fringe species—they are keystone engineers of Colorado's shortgrass prairie. Their colonies support more than 120 other species by providing food, shelter, and hunting grounds. These include burrowing owls, ferruginous hawks, swift foxes, and the endangered black-footed ferret. Many of these species are listed as conservation priorities under Colorado's State Wildlife Action Plan (SWAP) and require targeted protection. When prairie dog colonies collapse—whether from plague, shooting, or habitat loss—the entire ecological network begins to unravel.

Once stretching across hundreds of millions of acres, the shortgrass prairie was one of North America's most expansive ecosystems. Today, prairie dogs are at <1% of their original abundance— less than 2% of historic prairie dog habitat remains, fragmented by agriculture, development, plague, and poisoning campaigns. Prairie dog colonies—once the heartbeat of the plains—have been reduced to isolated pockets, many of



https://www.kunc.org/regional-news/2025-02-25/mountain-west-could-be-key-for-prairie-dog-conservation-study-finds?fbclid=IwY2xjawMVvsxIeHRuA2FlbQIxMQABHk-YzZiD6zPmM6m2G1s8zWU9GPu3D7VAI3Xq9cNXYqu29rralC5D8OZjEnqT_aem_Vhfv99YhwUHR_VvT6IVMhg

which are too small been reduced to isolated pockets, many of which are too small to sustain the species that depend on them. Comanche National Grassland is one of the last intact strongholds. Its sprawling acreage, native vegetation, and relatively undisturbed soil structure make it a rare refuge for prairie dogs and the 120+ species that rely on them. Comanche spans over 450,000 acres across its two units, offering some of the most promising habitat for prairie dog conservation in the region. Burrowing owls nest in abandoned tunnels. Swift foxes hunt along colony edges. Ferruginous hawks soar overhead, scanning for movement. Even the soil itself benefits—prairie dogs aerate it, cycle nutrients, and promote plant diversity.

Southeastern Colorado Is a Top-Tier Conservation Priority

Insights from Davidson et al. (2025): ***Potential Landscapes for Conservation of the Black-Tailed Prairie Dog Ecosystem*** *(https://onlinelibrary.wiley.com/doi/10.1111/ddi.13945)*

In 2025, leading scientists decided to study where to focus efforts and resources in the face of a shrinking habitat footprint for conservation for the prairie dog. The study used a spatial decision analysis to identify the top 10–30% of landscapes across the U.S. with the highest conservation potential for black-tailed prairie dogs (BTPDs). BTPD are the most ecologically important of all prairie dogs because they range the widest and have the biggest and densest colonies.

Southeastern Colorado—including Comanche National Grassland —ranked among the most ecologically suitable and least fragmented habitats remaining in the species' range.

These areas offer intact grasslands, low development pressure, and high habitat connectivity.

They remain viable even under future climate scenarios, making them essential for long-term resilience.

Despite identifying over 96,000 km^2 of top-tier habitat, the study found that only 4% of this habitat is currently protected from development. That includes federal lands like Comanche, which are not formally managed for prairie dog conservation—and large-scale hunting is occuring unchecked. This means Comanche is one of the few remaining places where prairie dog ecosystems can be protected at scale—and where CPW can act decisively to limit colony destruction for sport.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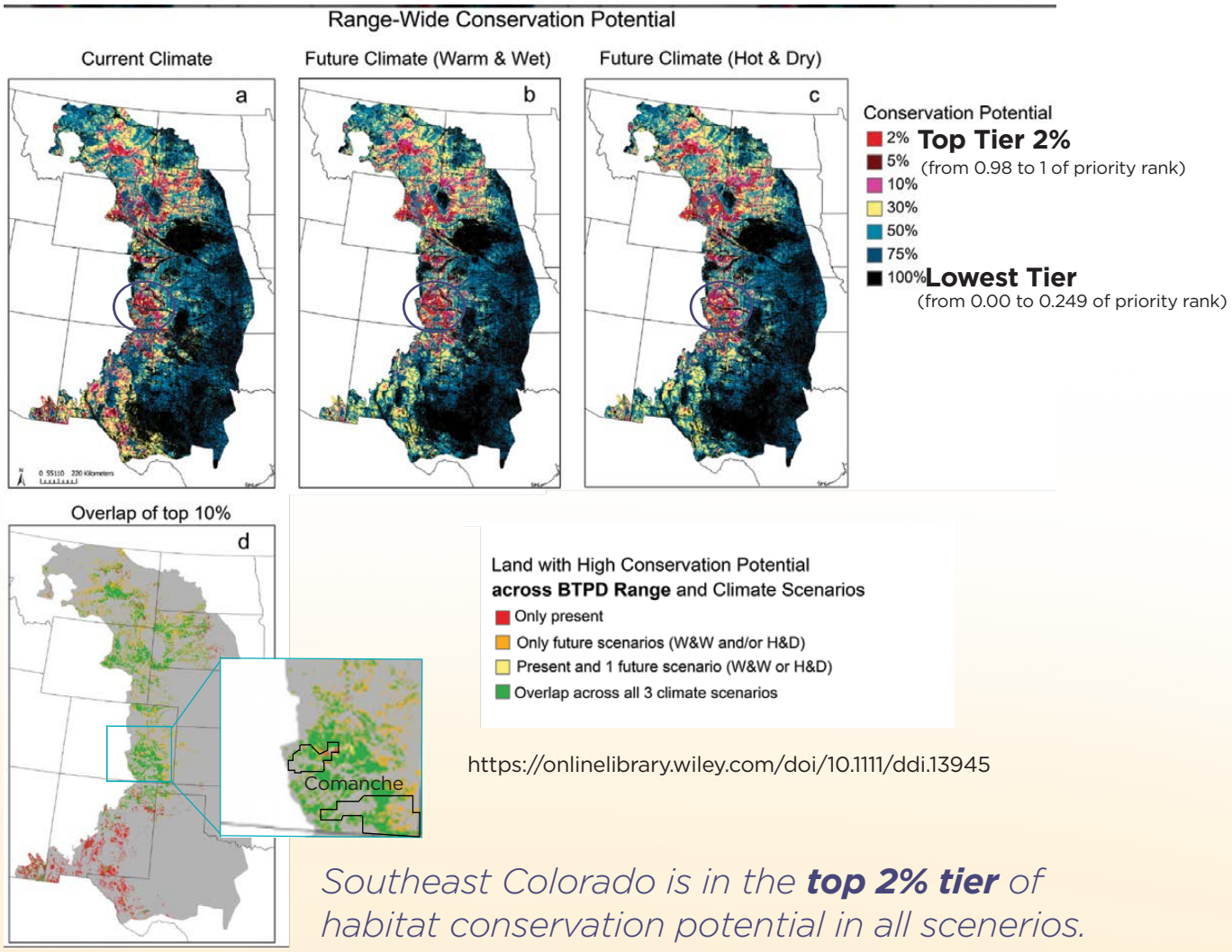
RESEARCH ARTICLE | Open Access
Potential Landscapes for Conservation of the Black-Tailed Prairie Dog Ecosystem
Ana D. Davidson, Fernanda Thiesen Brum, Michael Houts, Michael Menefee, Matt Williamson, Lindsey Sterling Krank, Bill Van Pelt, David J. Augustine
First published: 28 January 2025
https://doi.org/10.1111/ddi.13945
Citations: 1

Much of the HCP (high-conservation potential) habitat is located across regions where extensive, intact grassland habitat remains... including Comanche National Grassland in Colorado."

"These areas were also located where climate, soils and topography were most suitable for BTPDs... and remain strongholds underprojected climate change."

Davidson et al. highlight that even in ecologically ideal areas, human attitudes and jurisdictional complexity can derail conservation. That's why public lands with strong agency oversight—like Comanche—are critical.

- **CPW has jurisdiction over wildlife on these lands.**
- **CPW can regulate hunting, ammunition, and ethical standards.**
- **Public lands offer a unique opportunity to implement science-based policy without relying on private landowner buy-in.**



https://onlinelibrary.wiley.com/doi/10.1111/ddi.13945

*Southeast Colorado is in the **top 2% tier** of habitat conservation potential in all scenerios. Comanche is one of the top places in the American West for future BTPD conservation work.*

Part 2: CPW's "Healthy" Prairie Dog Population Claim vs. Reality

CPW describes prairie dogs as "an important and watchable species" and notes that three species—black-tailed, white-tailed, and Gunnison's—occur statewide. While CPW acknowledges threats like plague and habitat loss, their public-facing materials still imply that prairie dogs are broadly distributed and relatively stable in Colorado.

But the data tell a different story.

Overestimation by Aerial Surveys

According to ***Kearney et al. (2023),*** aerial imagery and deep learning models used to detect burrows can overestimate colony activity by up to 60% in plague-affected areas. In one case study, a colony that had collapsed due to plague still showed high burrow density, misleading both automated models and visual observers.

"Burrow density remained high despite colony collapse, leading to significant overestimation of active prairie dog presence." — Kearney et al. (2023)

This means that CPW's reliance on aerial burrow counts—without ground-truthing or vegetation analysis—could be inflating population estimates by tens of thousands of individuals across the state.

Habitat vs. Occupancy

Davidson et al. (2025) found that while Colorado contains over 20 million hectares of suitable habitat, only 9% is currently occupied by prairie dogs. That's a 91% gap between what's ecologically possible and what's actually happening on the ground.

If CPW's public materials suggest prairie dogs are "healthy" based on range maps and burrow imagery, they risk:

- **Underestimating the impact of plague and shooting**
- **Overlooking conservation needs in fragmented or recovering colonies**
- **Misleading landowners and policymakers about population viability**

A more accurate approach would combine aerial detection with vegetation indices, recent colony history, and plague risk modeling—just as Kearney et al. and Davidson et al. recommend. This accurate count will show that prairie dogs need greater protections and that their population is threatened, even within Colorado.

Part 3: The Plague Crisis and Genetic Erosion in Colorado's Prairie Dog Colonies

Sylvatic plague, caused by the bacterium Yersinia pestis, is an invasive disease introduced to North America in the early 1900s by humans. It spreads rapidly through prairie dog colonies via flea vectors and can cause mortality rates exceeding 90–95% during outbreaks. In Colorado, plague is now endemic—meaning it's always present at low levels, with outbreaks occurring every 5–7 years across the plains.

Entire colonies can collapse underground, often unnoticed until vegetation changes or burrow activity ceases. ***In 2019, Rocky Mountain Arsenal National Wildlife Refuge experienced a complete die-off*** across 150 acres, confirming the devastating scale of these outbreaks. Despite insecticide treatments and experimental vaccines, plague remains the leading cause of colony extirpation in Colorado.

Hunter Selection of Healthy Colonies: A Hidden Genetic Threat

As plague wipes out entire colonies, recreational shooters increasingly target the few remaining "healthy" populations—those not visibly affected by disease. This creates a dangerous feedback loop:

- **Selective Pressure on Resilient Colonies:** Research shows that prairie dogs in plague-endemic regions like Colorado and Texas exhibit partial resistance to plague, with survival rates up to 50–60% in lab challenges. These colonies may harbor genetic traits that could help the species adapt over time.
- **Genetic Bottlenecking by Bullets:** When shooters focus on these surviving colonies, they inadvertently eliminate the very individuals most likely to carry plague resistance. This undermines natural selection and erodes the species' ability to recover.
- **No Harvest, No Monitoring:** Recreational shooting is often unregulated, with carcasses left to rot and no data collected on colony health, genetic diversity, or population trends.

In short, bullets are doing what plague cannot: **targeting the survivors.**

The Perfect Storm: Plague, Hunting, and Survey Miscounts

CPW relies heavily on aerial surveys to estimate prairie dog populations. But these surveys often overestimate colony extent by 60–94%, especially in plague-affected areas like Comanche National Grassland. That's because aerial observers can't reliably distinguish between active burrows and abandoned ones. This creates a dangerous illusion: Plagued-out colonies are still being counted as "occupied," inflating population estimates and masking the true scale of collapse.

Policy decisions based on faulty data may delay protections, undercut recovery efforts, and justify continued recreational shooting. Combined stressors—plague, hunting, and miscounting—are driving prairie dogs toward functional extinction in key habitats.

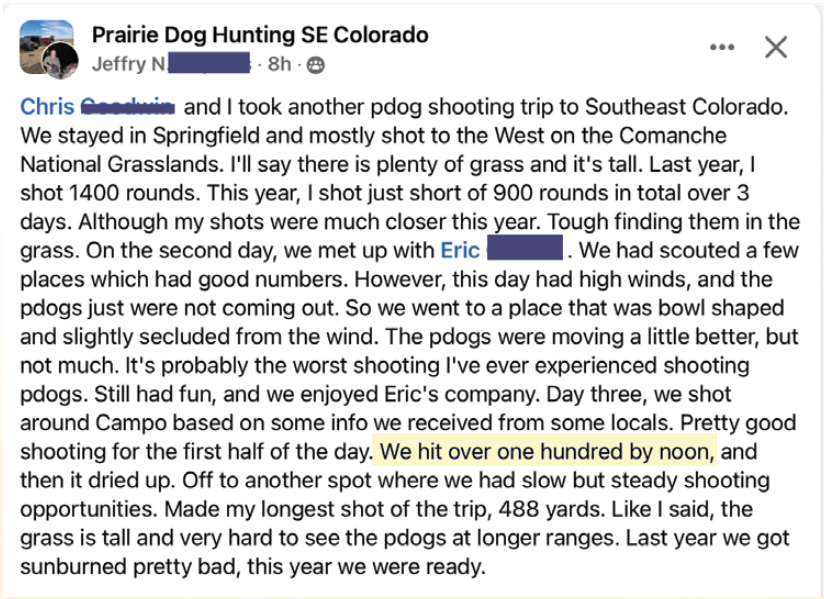
Part 4: Recreational Killing and the For-Profit Prairie Dog Industry

While CPW's miscounts obscure the true scale of prairie dog decline, another threat operates in plain sight: the recreational shooting of prairie dogs on public lands, often framed as "varmint control" or "target practice." But this isn't casual plinking—it's a booming business.

Prairie Dogs as Live Targets for Ammunition Practice

Across the West, guided prairie dog hunts have become a niche industry. Outfitters charge hundreds of dollars per day to escort clients—often older men from out-of-state—to "target-rich environments" where they can fire thousands of rounds at live animals. These are not regulated hunts. There's no bag limit, no carcass retrieval, and no ecological oversight. The goal is volume: shoot as many as possible, as fast as possible.

Some guides even advertise GPS-marked hilltops overlooking prairie dog towns, offering semi-guided packages for $375/day. Others provide full-service hunts with meals and lodging for $700/day. The prairie dogs are left where they fall—often riddled with lead, posing secondary poisoning risks to eagles, badgers, and other scavengers.



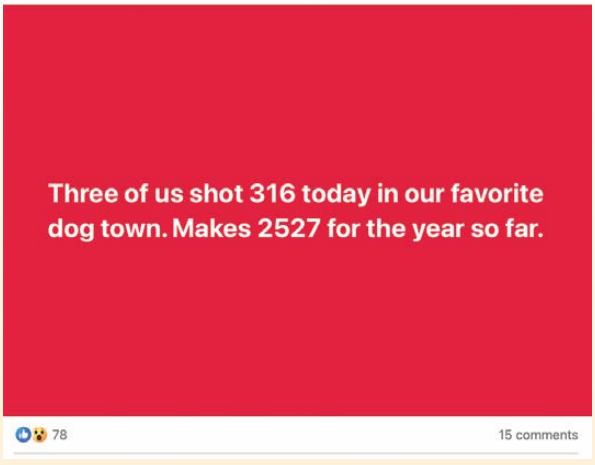
Prairie Dog Hunting SE Colorado
Jeffry N[redacted] · 8h ·

Chris [redacted] and I took another pdog shooting trip to Southeast Colorado. We stayed in Springfield and mostly shot to the West on the Comanche National Grasslands. I'll say there is plenty of grass and it's tall. Last year, I shot 1400 rounds. This year, I shot just short of 900 rounds in total over 3 days. Although my shots were much closer this year. Tough finding them in the grass. On the second day, we met up with Eric [redacted]. We had scouted a few places which had good numbers. However, this day had high winds, and the pdogs just were not coming out. So we went to a place that was bowl shaped and slightly secluded from the wind. The pdogs were moving a little better, but not much. It's probably the worst shooting I've ever experienced shooting pdogs. Still had fun, and we enjoyed Eric's company. Day three, we shot around Campo based on some info we received from some locals. Pretty good shooting for the first half of the day. We hit over one hundred by noon, and then it dried up. Off to another spot where we had slow but steady shooting opportunities. Made my longest shot of the trip, 488 yards. Like I said, the grass is tall and very hard to see the pdogs at longer ranges. Last year we got sunburned pretty bad, this year we were ready.

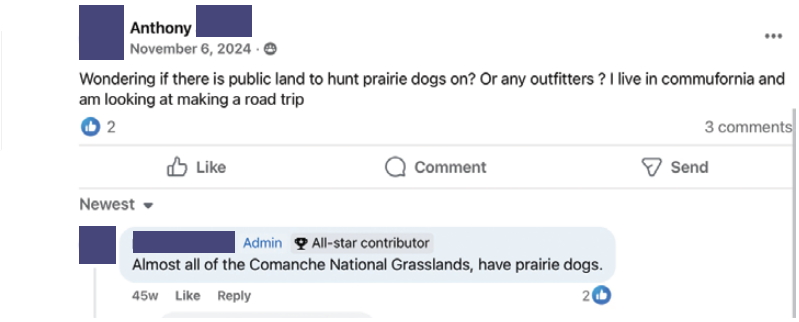
> Social media communities have formed around the goal of wiping prairie dogs off the map. These animals, already devastated by drought and biologically defenseless against plague, are now being targeted for sport. The myth that prairie dogs "carry plague" is used as a convenient excuse to justify mass killing—despite zero scientific evidence that they serve as reservoirs. In reality, they're victims of the plague, not vectors. But that nuance gets lost in their messaging. These groups target healthy colonies within public lands and move on to the next colony when they one they targeted are wiped out—continuing the cycle of destruction.

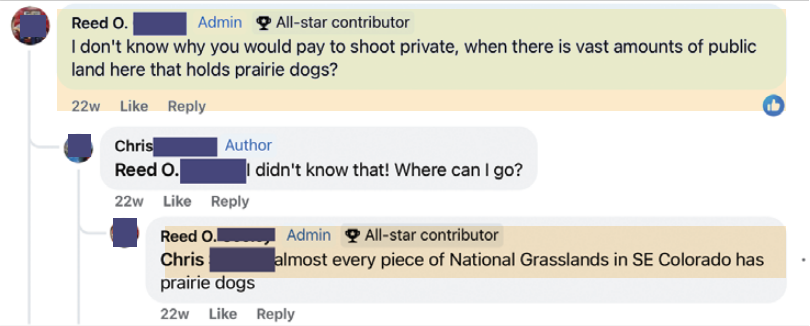
According to Davidson et al. (2025), 24% of the highest conservation potential habitat for prairie dogs is on public land, including National Grasslands like Comanche and Pawnee in Colorado. These lands are meant to serve the public interest—not subsidize the extermination of a keystone species for sport.

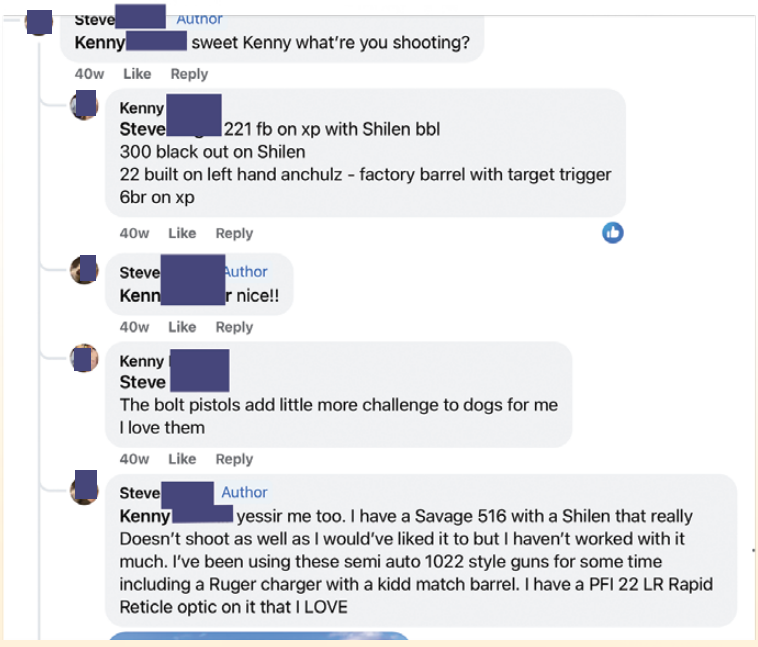
Yet CPW allows prairie dog shooting on many of these lands with minimal restrictions. This creates a perverse incentive: the very landscapes identified as critical for recovery are being leased or accessed for recreational slaughter.



"Why you would pay to shoot private, when there is a vast amounts of public lands here that has prairie dogs."







Many of these posters now complain that all the large colonies are gone now and only small colonies are left. With plague and this type of extreme killing, prairie dogs are disappearing on public lands.

MR Picuda 4-16 Arken just had to put a 34 mm tube big scope on this pistol. We are hollow, pointing solid ammo with the Neal waltz tool, and we just love it doesn't affect accuracy. We're getting some great meat reports even beyond 200 yards we just love it.

Had a little fun today! For our extended morning, I believe Eric had a head count of 66! Mine was 31.

Nicholas [redacted]
June 26 ·

My 6.5-284 round on the left, the guy she keeps telling me not to worry about on the right (300 PRC)

Kester [redacted]
Broke 1100 last week.
45w Like Reply 2

Reed O. [redacted] Author Admin +1
Kester [redacted] NICE!
45w Like Reply

[redacted]
Reply to Kester [redacted]

Juan [redacted] Rising contributor
Did some Sunday. Probably the last one of the year, time start chasing coyotes.
45w Like Reply 2

Reed O. [redacted] Author Admin +1
Juan [redacted] yeah, time for elk...almost time for deer
45w Like Reply

Went out for a quickie this afternoon, to test out some Sierra 77gr TMK's. I couldn't tell from the video, if it was a hit....so the next pic, is the headshot. I believe the 77's are going to be great prairie dog medicine!

The screenshots in this document, used for educational purposes, were sourced from a Southeastern Colorado prairie dog hunting group on Facebook. They provide direct, numeric evidence of the consequences of unregulated prairie dog shooting on public lands—highlighting the scale, frequency, and normalization of mass recreational killing in the absence of enforceable oversight.

Lead and Lethal Indifference by Prairie Dog Hunting groups

Prairie dogs are routinely shot and left to decompose in the sun—often with lead bullets still lodged in their bodies. This isn't just cruelty; it's contamination. When prairie dogs are shot and left to rot, they become toxic bait. Scavengers like swift foxes, coyotes, badgers, and even ferrets feed on these carcasses and ingest lead fragments lodged in muscle tissue or bone. Unlike birds of prey, mammals may pass lead more quickly through their digestive systems, but repeated exposure still causes neurological damage, immune suppression, and reproductive failure. A 2022 United States Geological Survey (USGS) study found nearly half of bald and golden eagles suffer from chronic or acute lead poisoning. California condors, which occasionally range into Colorado, are especially vulnerable—***90% tested showed lead exposure.***

Despite growing awareness, many shooters still use lead ammunition, citing cost or convenience. The result is a ripple effect of harm across the food web. These kills are rarely retrieved, buried, or monitored. Instead, prairie dog towns become graveyards—silent but deadly—to the very species that conservationists are struggling to protect.

CPW's 10-year State Wildlife Action Plan, set to be finalized in September 2025, includes outreach and incentives for hunters to switch to non-lead options, but does not introduce any new regulations.

According to the ***Cornell Wildlife Health Lab***, lead bullets are designed to fragment on impact—spreading microscopic shards throughout the body. A single gut pile or prairie dog carcass can contain enough lead to poison multiple animals.

Advocacy groups—including Public Employees for Environmental Responsibility and the Coalition to Protect America's National Parks—***have formally urged CPW*** to phase out lead ammo and tackle on state lands.

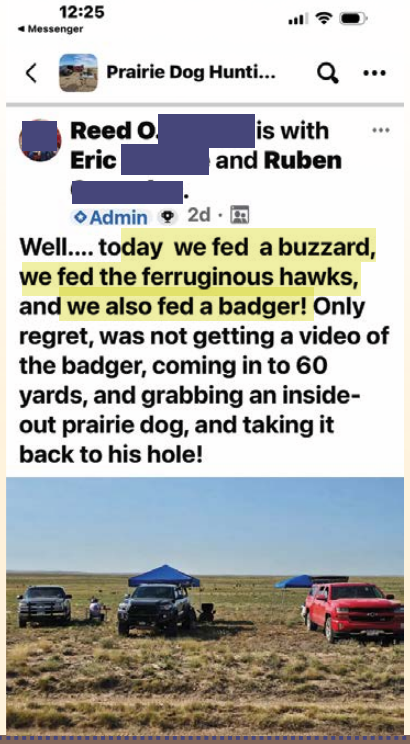
Voluntary Efforts & Pilot Programs do not work

In 2023, Colorado launched a pilot program with:

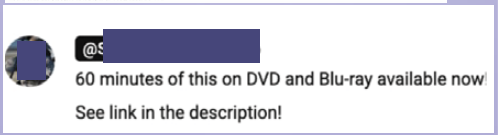
- **Range demonstrations comparing lead vs. copper ammo**
- **Hunter sentiment surveys**
- **Public education on lead-free alternatives**

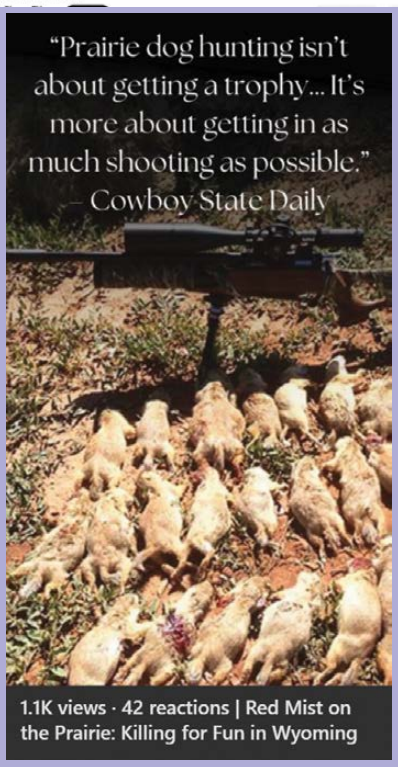
CPW's website now assures hunters that non-lead options are comparable in price and performance but that does not stop hunters from using lead bullets on our national public lands.

Voluntary programs sound good on paper—but in practice, they let shooters off the hook. Without rules, there's no incentive to change behavior. They know there's no enforcement, no monitoring, and no consequence. The result? Toxic carcasses litter the landscape while wildlife pays the price. Until CPW sets actual standards, "voluntary" just means optional—and most opt out.



"Red mist" groups are all over the internet. They sell videos of carnage of our wildlife, especially prairie dog colonies. The goal is to create as much 'red mist' with each death for views, clout, and money.





DEEP DIVE:
Wildlife Killing Contest Bans—and Why That Matters for Prairie Dogs on Our Public Lands in Colorado

Colorado's Stand Against Wildlife Killing Contests

In 2020, **CPW banned wildlife killing contests** targeting species like coyotes, foxes, and prairie dogs. These events, often disguised as "population control," rewarded participants for killing the most animals—turning cruelty into competition. The ban reflected growing public support for ethical wildlife management, ecological science, and the principle that wildlife on public lands belongs to all of us.

The ban was rooted in:

- **Ethics:** Public sentiment overwhelmingly opposes killing animals for prizes or entertainment.
- **Science:** Indiscriminate killing destabilizes ecosystems and fails to achieve long-term population control.
- **Public Trust:** Wildlife on public lands belongs to all of us. Management must reflect shared values—not fringe spectacles.

But here's the loophole: while formal contests are banned, mass prairie dog shoots continue under the guise of "recreation" or "target practice." And worse—many are filmed, edited, and sold as "red mist" entertainment. Even without trophies or entry fees, red mist prairie dog shoots replicate every element of a banned killing contest.

Because studies have shown that mass killing of entire colonies has a destabilizing effect on the ecosystem as a whole, both wildlife killing competitions and mass target practice of wildlife on public lands are identical in their outcomes. While there may not be money or prizes, there is profit in the selling of videos of these mass casualty events.

Not only does this commodify cruelty, it incentivizes repeat behavior. Shooters return to the same colonies year after year—not for management, but for spectacle. The ecological damage is compounded: burrow systems collapse, predator-prey dynamics unravel, and native grasslands lose one of their most important engineers. This is not incidental harm. It is systemic, predictable, and preventable.

If Colorado has banned killing contests on ethical and ecological grounds, then it must also address the loophole that allows mass killing to continue under the guise of recreation and media production. The outcome is the same. The impact is the same. The only difference is the packaging.

The Solution: Protective Measures for Public Lands and Keystone Species

Under Colorado Revised Statutes Title 33, CPW retains jurisdiction over all wildlife within the state, including on federally managed lands like national grasslands. Wildlife not lawfully held in private ownership is the property of the state, and its management falls under CPW's purview. CPW can restrict hunting methods, ammunition types, and species-specific take limits—even on federal lands. While federal agencies manage land ownership, CPW retains regulatory authority over non-game species—including prairie dogs—on both state and federally managed lands within Colorado.

CPW has authority to expand this program and issue guidance restricting lead use in sensitive habitats. Colorado currently lacks a statewide ban on lead bullets, but HB23-1036 established a pilot program encouraging voluntary transition to nontoxic alternatives.

Therefore, it is incumbent upon Colorado Parks and Wildlife to establish a regulation that formally recognizes the prairie dog as a keystone species and safeguards public lands from ecological degradation. The following proposed policy aims to reduce lead contamination affecting wildlife and to protect a threatened species whose true population numbers are significantly overestimated by current survey methods.

By implementing enforceable guidance—banning lead ammunition, requiring permits for mass shooting events, and clarifying prairie dog protections—CPW can shift from passive tolerance to active stewardship. These reforms are not anti-hunting; they are pro-ecosystem, pro-accountability, and pro-Colorado.

Policy Proposal for Colorado Parks and Wildlife

Guidance on Recreational Prairie Dog Shooting in Colorado's Public Lands

I. Summary

This proposal recommends new regulatory guidance for recreational prairie dog shooting on federally managed lands within Colorado where CPW retains wildlife jurisdiction, including Comanche National Grassland. It responds to mounting evidence of ecological harm caused by unregulated recreational shooting, including mass extermination events, secondary lead poisoning of scavengers, and the destabilization of prairie ecosystems.

This guidance applies to prairie dog shooting on public lands statewide. While Comanche National Grassland in southeastern Colorado serves as the focal case study, the proposed regulations are intended to apply to prairie dog hunting only—not to other game species.

Prairie dogs are a keystone species whose colonies support over 120 associated species. Yet less than 2% of their historic habitat remains, and southeastern Colorado represents one of the last intact strongholds. Recreational shooting—often conducted for sport, not harvest—has escalated in frequency and scale, with some outfitters reporting over 900 kills per day per client. These activities are largely unmonitored, unregulated, and incompatible with CPW's conservation mandate.

Although prairie dogs are currently classified as small game under Colorado law, their ecological role and lack of harvest for consumption warrant species-specific oversightThis proposal outlines enforceable standards to mitigate ecological damage, align recreational shooting with ethical and scientific norms, and ensure CPW's wildlife stewardship responsibilities are upheld on public lands.

II. Legal Authority

This guidance is issued pursuant to **Title 33 of the Colorado Revised Statutes**, which grants CPW full jurisdiction over wildlife management on all lands within state boundaries, including federally managed lands such as National Grasslands. CPW has the authority to regulate:

- Methods of take
- Ammunition types
- Bag limits
- Commercial guiding
- Wildlife protection standards

CPW may codify this restriction within its 'manner of take' regulations to ensure consistency with other species-specific rules. This proposal also aligns with CPW's obligations under the **State Wildlife Action Plan, the Colorado Nongame Conservation and Wildlife Restoration Act, and the Interstate Wildlife Violator Compact.**

III. Definitions

Recreational Prairie Dog Shooting: The act of killing prairie dogs for sport, without intent to harvest for food, population control, or scientific research.

Protected Grasslands: Federally managed lands within Colorado where CPW retains wildlife jurisdiction, including Comanche National Grassland, Pawnee National Grassland, and designated state wildlife areas.

Lead Ammunition: Projectiles containing lead, including bullets and shot, which pose toxicity risks to scavengers and predators through secondary ingestion.

Small Game Species: Prairie dogs are currently listed under Colorado's small game category, despite not being harvested for food.

IV. Provisions

1. License & Reporting Requirement

All recreational prairie dog shooting on protected lands must be conducted under a CPW-issued license. CPW will explore integrating prairie dog harvest reporting into existing systems such as the Harvest Information Program (HIP) to reduce administrative burden and improve compliance.

Permits shall specify:

- **Daily and seasonal bag limits**
- **Approved shooting zones**
- **Ammunition restrictions**
- **Reporting obligations**

Seasonal Closure: Permits will include a **seasonal closure from February 15 to July 15** to protect prairie dog breeding colonies and dependent young during their most vulnerable period. (While current public land closures end June 15, ecological data show that pups are born in March–April and begin emerging from burrows in late May through June, remaining dependent on maternal care during this time. Shooting during this window risks orphaning entire litters and collapsing colony structure. CPW may adjust closure dates annually based on ecological monitoring, plague risk, and land management needs to ensure continued colony viability.)

2. Lead Ammunition Ban

Effective immediately, lead-based ammunition is prohibited for prairie dog shooting on protected public lands statewide. ***This restriction does not apply to other small game or big game species.***

Hunters must use nontoxic alternatives (e.g., copper, steel, bismuth) to prevent secondary poisoning of scavengers. CPW will provide outreach and vendor guidance to support transition. CPW will also expand outreach efforts to foster stewardship and understanding of lead-free practices, recognizing that cultural change requires more than compliance.

3. Bag Limits

Recreational shooters **may not exceed 5 prairie dogs per day per person**.

Commercial outfitters must:

- **Report total take monthly**
- **Submit GPS-tagged colony data quarterly**
- **Maintain client logs for CPW review**

4. Ethical Harvest Standards for all shooters

- **Carcasses must be retrieved or buried to prevent scavenger exposure.**
- **Shooting for "target practice" or "plague control" without scientific justification is prohibited.**
- **CPW may require carcass disposal plans as part of permit issuance.**

5. Outfitter Accountability

Commercial guiding for prairie dog hunts must be licensed and registered with CPW. Outfitters must comply with DORA regulations and coordinate reporting with both CPW and designated contacts within DORA.

Outfitters must:

- **Comply with permit conditions**
- **Submit annual impact assessments**
- **Participate in CPW-led ethics training**

Violations may result in permit revocation, fines under Title 33-6-107, and referral to the Interstate Wildlife Violator Compact.

6. Monitoring & Enforcement

CPW will work with DORA to ensure outfitter conduct and reporting are aligned across agencies.

CPW will partner with:

- **U.S. Forest Service (USFS)**
- **Bureau of Land Management (BLM)**
- **Local NGOs and universities**

Monitoring will include:

- **Colony health assessments:** Colony health metrics will be developed in collaboration with NGOs, universities, and prairie dog researchers, and may include burrow occupancy rates, plague risk modeling, and genetic diversity indicators.
- **Ammunition residue sampling:** Environmental lead sampling will be conducted seasonally at high-use prairie dog shooting sites on public lands. Soil and vegetation samples will be collected using standardized protocols developed in consultation with state toxicologists and university researchers. Sampling will focus on areas with known recreational shooting activity and historical colony presence.

  Results will be analyzed for lead concentration thresholds that pose ecological or public health risks. Findings will be used to inform adaptive management strategies, including site remediation, public education, and potential expansion of lead-free zones. CPW will collaborate with NGOs and academic institutions to publish findings and refine best practices.

- **Compliance audits:** CPW will submit annual reports to the ColoradoParks and Wildlife Commission summarizing enforcement outcomes and ecological impacts.

V. Scientific Rationale

- Davidson et al. (2025) identified southeastern Colorado as one of the top 10% of landscapes for prairie dog ecosystem conservation, with Comanche National Grassland as a key stronghold.
- Kearney et al. (2023) demonstrated that aerial burrow counts overestimate prairie dog populations by up to 60%, especially in plague-affected areas.
- USGS (2022) found that nearly 50% of North American eagles and 90% of Californian condors show signs of lead exposure, much of it linked to hunting remains.
- Miller & Reading (2012) argued that black-footed ferret recovery hinges on protecting prairie dogs, their primary prey and shelter source. They found that unregulated shooting and poisoning of prairie dogs—especially on public lands—remains the biggest barrier to ferret conservation, and called for federal protection to restore ecological function.

VI. Expected Outcomes

- **Reduction in mass recreational killings and ecological degradation**
- **Decreased lead exposure in raptors and scavengers**
- **Improved public understanding of prairie dogs' ecological role**
- **Strengthened interagency collaboration and data-driven management**
- **Alignment with CPW's conservation mandate and public trust obligations**
- **Increased genetic library of plague-resilient prairie dogs—critical for long-term recovery**
- **Increased voluntary stewardship and ethical engagement from recreational users**

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We work to...

- Collaborate with key stakeholders to save keystone species.
- Educate the public on the dangers of rodenticides, pesticides, and herbicides
- Support biodiversity preserves and wildlife corridors
- Promote land management that protects native grasses and pollinators
- Highlight regenerative farmers and ranchers with sustainable and humane practices
- Shine a light on wildlife issues within the state of Colorado

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