

BOARD OF DIRECTORS August 25, 2006

Chris Morrison

Gary Sprung

Holly Tulin

To: Don D'Amico and Joe Mantione **Guy Burgess**

Subject: Eldorado Mountain/Doudy Draw Draft Trail Study Area Plan, Jim Knopf

August 2, 2006

Mike O'Brian The Boulder Area Trails Coalition (BATCO) has reviewed the Open Space

> and Mountain Parks (OSMP) Department's draft of the Eldorado Mountain/ Doudy Draw Trail Study Area (EM/DD TSA) Plan. We support the majority of the staff's recommendations. We are particularly pleased that the plan recognizes the recreational importance of the area, supports multi-use trails

within the area, and acknowledges the future potential for important regional

trail connections to and via the EM/DD TSA.

In any plan of this complexity there are many difficult decisions to be made. **Eric Vogelsberg** We offer the following recommendations for modifications to the draft plan.

which we believe will improve its recreational qualities, balance, and **Suzanne Webel** probability of success:

> 1) Flatirons Vista North Loop Trail (Item C.4) - We recommend the Flatirons Vista North Loop Trail be designated now rather than later. The draft plan defers the trail's designation until some future time, after a review of future conditions. Deferring designation of this trail until some unspecified future date will merely force us to repeat this portion of the TSA a few years from now. To protect the resources, improve the visitor experience, and avoid unnecessary duplication of staff and the public efforts it makes sense to designate the trail alignment now.

The view from the mesa edge offers such a powerful attraction that the development of social trails in the area is inevitable. Given the plan's objective to protect the mesa grasslands and ground nesting birds, we believe that designating a single trail alignment before damage is done is the most appropriate management action. We recommend that this multi-use trail be limited to on-trail travel during the proposed seasonal grasslands closures. The topography of the area and the existing fence lines provide positive controls to help ensure on-trail access.

2) Doudy Draw Lower Trail (B.7) - We recommend that the short, pedestrian-only (no dogs, horses, or bikes) Doudy Draw Lower Trail be reinstated in the plan. We acknowledge the staff's concerns about the undesirability of the visitor experience on this trail, but note that the plan also proposes closing "numerous undesignated trails" in the area. The social trails would not exist if there were not significant visitor interests in the area.

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Designating a single trail will help control the social trails while satisfying a recognizable visitor desire. We have observed in other locations (the Lichen Loop Trail at Heil Valley Ranch in particular), that providing such a trail reduces user conflicts and broadens the range of visitor opportunities for families with small children, the elderly, and others who may be uncomfortable with bikes, horses, or dogs.

- 3) Equestrian HCA Off-trail Permits (Item E.5) We understand and accept that there may be areas within the Eldorado Mountain HCA without the trail infrastructures appropriate for some visitor activities. The steep mountain slopes in the western half of the HCA may not presently be suitable for equestrian or bicycle access. We do not believe, however, that the blanket exclusion of a particular visitor group from the entire HCA can be justified. With the institution of the off-trail permits system, the existing uses in the HCA will dramatically decline, and impacts will be reduced. The Bull Gulch area in particular could certainly sustain limited, off-trail equestrian visitation, and such off-trail permit use should be allowed.
- **4) Doudy Draw Trailhead Improvements (B.1)** Our growing visitor population will put increasing demands on the trail head infrastructure. We therefore recommend that the planned Doudy Draw Trailhead improvements include a physical expansion of the parking lot in anticipation of this demand. In particular, OSMP should make provisions for pull-through horse trailer parking to help alleviate congestion at the Flatirons Vista Trailhead.
- 5) Deferred decisions (B.1, B.4, B.8, C.3, C.4, C.7, D.1, D.2, D.6, D.7, D.11, and E.7) The draft contains many instances of decisions deferred, rather than made. While we recognize that an adaptive management approach requires future flexibility, we believe unnecessarily deferring decisions is unwise and leads to future requirements to revisit the TSA process and repeat portions of today's efforts.

When there is a clear reason not to make a decision now, it's vital that there be a timeline for a future review, including an opportunity for a public discussion, before the decision is finally made. Otherwise such deferments may become avoidance devices, de facto endorsements of the status quo, or tools to circumvent public review. The draft addresses these concerns in some cases (B.3, D.3, and E-4), but leaves the timing and criteria for other major decisions undefined. The scheduling and processes for at least the major decisions dealing with trail designations or closures and with permitted visitor uses should be included in the plan.

We appreciate the opportunity to comment on the draft plan and hope for the success of the plan and the TSA process.

Sincerely,

Boulder Area Trails Coalition Board of Directors

Cc: Mike Patton