

USDA Forest Service
Arapaho-Roosevelt National Forest
Boulder Ranger District
Brainard Planning
Attn: Christine Walsh
Glen Cook
2140 Yarmouth Ave.
Boulder, CO 80301-1615

Sept. 15, 2005

Re: Brainard Lake Environmental Assessment

Dear Ms. Walsh and Mr. Cook:

On behalf of The **Boulder County Horse Association (BCHA)** I am hereby offering our comments to the Brainard Lake Recreation Area Development/Management Projects document which was released on August 24, 2005.

We are quite sure that the plan outlined will, as it reassures readers frequently throughout the document, reduce the dominance of vehicles on the landscape and may therefore improve the quality of recreation opportunities – if one happens to be a cross-country skier, hiker, or mountain biker. Surely it is hard to argue that improved maintenance of trails, elimination of dispersed camping, and additional regulations and management actions will result in improvements to the environmental sustainability of the area.

However, as equestrians we are alarmed that this plan eliminates our historic access to yet more of Roosevelt National Forest, and we do not understand the reasons for this action. We suffered several years ago when the entire complex of trails west of Brainard Lake was closed to horses: Beaver Creek, Mt. Audubon, Mitchell Lake, Pawnee Pass, Isabelle Glacier, Jean Lunning, Niwot Ridge West and North, Little Raven and the CMC Ski Trail. These closures were done in the name of designating the Brainard Lake Developed Recreation Area, specifically the area containing the lake and the campground. It was our understanding that Forest Service policy is to attempt to construct equestrian bypass trails around Developed Recreation Areas. Not only did this never happen here, but now we find the proposed boundaries of the Developed Recreation Area are expanding to include several more trails: South St. Vrain, Waldrop North, and Left Hand Park Reservoir... with the result that equestrians may, according to the document, be banned from those trails as well.

The outcome of the current management plan will be to restrict all equestrian use of this large and diverse area of Roosevelt National Forest to one small, monotonous trail (the Sourdough), which was constructed in the 1970's to divert visitors from the (more desirable) Indian Peaks Wilderness. While we accept the Sourdough as a valuable north-south trail connection, it does not offer the same

quality user experience that the other established trails in the region do, and we do not want to have all our use restricted to this one busy alignment.

Why this severe curtailment of horses on the National Forest? No reasons are given in this document and none have been offered by staff. Therefore, **BCHA formally objects to this Forest Plan now and we reserve the right to appeal later.**

In fact, we find equestrians to be curiously invisible to this Ranger District -- in spite of our long historic use of the National Forest and our frequent contributions to trail maintenance efforts there. We understand that all visitors have impacts, and we believe it is important for all visitors to try to mitigate those impacts by volunteering our time and resources as a way of "giving back" something to the system for the enjoyment we derive from it. Volunteering also develops a sense of stewardship and a better understanding of the issues facing public land management today. A few recent examples of equestrians providing volunteer time include work on the Sourdough Trail, the West Magnolia trail complex, and offers of financial help as well as volunteers in the Switzerland Trail connection from Caribou Ranch to the Rainbow Lakes Road. We have also spent countless hours analyzing and providing equestrian input on other Travel Management Plans, all on a volunteer basis. Yet in spite of our support, we continue to remain invisible to management, and our recreational needs are increasingly threatened.

For example, we have been involved since the beginning of this Plan, and we explicitly pointed out in our November 30, 2004 response to the Environmental Assessment our surprise at not being included on the list of organizations consulted. Yet, almost a year later, we are still not listed with the other organizations that were consulted (p.96). A small slight, perhaps, but why??

On page 1 of the current document, "Purpose and Need" describes the wide variety of recreation uses enjoyed in the BLRA, including "camping, hiking, biking, fishing, viewing scenery, birding and access to the Indian Peaks Wilderness." No mention of horseback riding. Why?? Similarly, almost four (4) pages of the text (p. 46-49) describe in some detail the effects of the Proposed Action on various categories of recreationists. While equestrian is mentioned here in passing, the detailed breakout includes "Dispersed Camping... Target Shooting... Fishing... Viewing Scenery... Wildlife Viewing and Birding... Non-motorized Boating...Hiking...Mountain Biking... and Winter Recreation." No detailed mention of horseback riding. Why no analysis of how the proposed plan would affect horseback riding??

The Proposed Action (p. 4) summarizes fourteen (14) ways the Plan would affect the Brainard Lake area, including constructing a new campground, constructing an entrance station, improving boat access, improving and reconstructing new trails and building new trail connections. Yet it neglects to mention that equestrians will be banned from several trails. Why?

The plan does mention (p. 16, 42) “a designated area to unload horses” at a new entrance station (which would be nice, while they are at designing a new trailhead parking area for all visitors) – but doesn’t take into consideration the paradox that equestrian use will presumably diminish if our overall access to trails is being restricted!

The plan waxes poetic about how “visitors to the area will experience an environment where the sights and sounds of nature predominate... the undeveloped character of the area away from roads and trails will be maintained and all trails will be managed for non-motorized use” (p.5). Horses are part of nature and are certainly part of the non-motorized recreation mix! Again, no mention is made of the reasons behind banning us from several desirable long trails – only by digging into the depths of the document (p. 19) does one find an admission that horses would “continue to be restricted to the Sourdough Trail only.” Continue?!? Right now we have more access than that. Why are we being restricted to the Sourdough Trail only? No reasons are given.

BCHA supported the construction of a new entrance station along the Brainard Lake Road, as long as it didn’t impair our access to trails. However, we now find a proposal to move the entrance station farther east along the road – “prior to the Left Hand Park Reservoir Road junction, thereby making it logistically essential to include the entire Left Hand Park Reservoir Area into the whole of the BLRA and under its fee structure” (p. 10). Translation: so horses could be banned from this road (which currently functions as a trail for hikers, skiers, mountain bikes and equestrians alike). Left Hand Ditch Company doesn’t have an issue with equestrians using its access road – I know that, because I have asked them (since I am a shareholder in the Ditch). Why was this action considered so “necessary” by the Boulder Ranger District?

We note that our mountain bicycling brethren have been offered “significantly improved opportunities” in the Brainard Lake Plan, and we are happy for them. Their recreational access will now include Brainard Lake Road and Left Hand Park Reservoir Road, and the Sourdough, South St. Vrain, Waldrop, Brainard Lake Cutoff, Little Raven, Little Raven Extension, and Snowshoe Trails (p. 19, 48), making several loop trails and connections. We note that the plan includes re-routing part of the South St Vrain Trail to avoid the Wilderness Area boundary -- specifically so that mountain bikes can access this area. Yet horses are not supposed to be banned from Wilderness Areas! Why are we being singled out here, when mountain bike opportunities are expanding?

In our November 30, 2004 letter responding to the Brainard Lake Environmental Assessment we asked why such severe restrictions were being proposed for equestrians – and were told that staff had generalized concerns about “future user conflicts” including from mountain bikers. At the time we attached letters of support from the leading local mountain bike advocacy groups, the Boulder Area

Trails Coalition and the Boulder Offroad Alliance. We would have thought that show of solidarity would eliminate any question about user conflicts – but a year later we're still left with equestrian restrictions and we still have not heard a single coherent reason to support them.

Therefore, this letter is full of specific questions to which we request specific answers.

There are many ways to mitigate impacts and still accomplish a multi-use objective for the majority of National Forest infrastructure. For example, we suggest that improved signage and education, and better trail maintenance, would go a long way toward reducing user conflicts. Bypass trails should be built around the new visitor entrance station so that equestrians can continue to access the South St Vrain and Waldrop Trails and the Left Hand Park Reservoir Road. Surely if there is a will there can be a way to make this plan work for everyone.

Equestrian use is so invisible to the Boulder Ranger District that we are not even listed in the list of Key Issues and Questions raised during public and internal scoping efforts; nor are we even listed among the issues Dismissed from Detailed Analysis (p 10-13). **If we are that invisible, surely we have negligible impacts – therefore, we should be allowed to continue our recreational access!!!**

Thank you for your consideration of this input. Please include BCHA as a resource for ongoing equestrian information and support.

Respectfully submitted,

Suzanne Webel
BCHA External Vice President, Trails Chair