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City of Boulder Open Space and Mountain Parks
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Summer travel commitments and now a serious knee accident have prevented me from participating in the **Marshall Mesa-Southern Grasslands Trail Study Area** meetings. However, like many other members of the public, I have studied the various documents produced by staff and have provided input representing BCHA's extensive equestrian experience in this area and containing our recommendations for its future management from an equestrian perspective. I had hoped that after the long and arduous Visitor Master Planning process the current TSA – the first of many under the new VMP -- would result in a balanced, precedent-setting plan of which we could all be proud.

Instead, I grieved deeply as I reviewed the "Draft Report on Trail Alternatives – Summary" prepared by staff for the Sept. 8 Open House and Task Force meeting. This document is anything but balanced and makes me extremely concerned about the future of other TSA's in specific and the VMP in general.

There are so many items that need to be addressed it is discouraging to know where to start.

Overall, it is difficult to escape the impression that the only alternatives favored by staff are closing historic and desirable visitor use patterns and instituting tightly restricted lower-quality ones, if at all. The list of "Pros" is short if staff doesn't like an alternative and the list of "Cons" very long indeed; conversely, if staff likes an alternative the list of "Pros" is long and the list of "Cons" is short – regardless of clear public sentiment and common sense. This is not an objective way to analyze the options, and perpetrates the public impression that the VMP is merely a sham to give the OSMP Department license to do what it had been planning to do all along.

For example, let's look at "Alternative #25 – New trail from the Greenbelt Plateau Trailhead to the Existing Cattle Underpass near the Old Matterhorn Site, with connections to Community Ditch Trail and Doudy Draw Trail; open to equestrians" (p. 16-17). Although this alternative was recommended by BATCO more than five years ago and was approved by the Open Space Board of Trustees (after many long debates), no progress has been made in realizing this tiny, tiny trail segment, due in large measure to environmental concerns that were proved false and to inexplicable resistance from staff. In the current document this alternative merits two brusque,

reluctant, one-line “Pros”: would provide additional safe crossing under S.H.93 using an existing box culvert, and has dramatic vistas. On the other hand, staff found nine, expansively-fleshed-out “cons” to justify their previously-staked-out opposition to this alignment! I submit that many of the “Cons” are inaccurate, such as pointing out that the box culvert is narrow and has a low ceiling height for equestrian use, so riders will have to dismount their horses. This is a non-issue for us and we have said so, many times. We have actually used this alignment for many years and would continue to do so happily, but staff has systematically fenced off our historic connections to the other trails on both sides of Hwy 93, so until this culvert is designated officially its utility to us is greatly diminished. The nesting swallows objection was brought up by a member of the OSBT years ago and another member of the OSBT – a bird expert – shot down her colleague’s objection by pointing out that the birds in question are common barn swallows that don’t need special protection. Yet here we are, still fussing over them and claiming that they “must” be protected. Many other culverts contain similar assemblages of swallow nests, but those swallows are not being singled out as reasons to close the trails in those culverts – why here, why now? Additional “Cons” pointed out by staff include “safe connection across Hwy 93 already made at stoplight near Greenbelt Plateau Trailhead and the planned underpass at Community Ditch Trail.” In our July 15 letter on this matter we elaborated on why both of those are not safe connections for equestrians – but our points appear to have been ignored. A questionable “con” (this one is really a stretch) is that “a trail connection to the Community Ditch Trail on the west side of the underpass would have to get approval of the ditch company.” Excuse me, but that’s ridiculous – we have been using a perfectly good connection for years to the west side of Community Ditch, the ditch company has had nothing to do with it and had no objections anyway – so, this is a great example of an ongoing staff issue being couched as someone else’s issue instead. Finally, the document points out that staff’s preferred alignments also have “dramatic views” – sure they do, of highway traffic and the inside of a tunnel, respectively. Thanks but no thanks.

The words themselves reveal staff’s strong predilections throughout the document. For example, when a matter deals with the quality of the visitor experience, the words chosen include short, terse, qualified phrases such as “possibly provide a better experience” (p. 19, ignoring the fact that visitors themselves requested this particular change); “Some visitors feel that their experience is reduced when the trail is located next to a highway or fences” (p. 21, p. 10; Hello?? It’s to imagine an honest visitor who doesn’t feel that way!), “provide another loop opportunity” (p. 15, implying that another loop opportunity is frivolous and uncalled-for); “extensive expansion to accommodate horse trailers will remove a large area of rare plant community vegetation” (p. 23, these rare plants have never been mentioned before but almost seem to have popped up recently in order to justify a no-action alternative; surely they could be accommodated along with a redesigned parking lot, if there were a will to do so! Who is talking about an “extensive expansion,” anyway? What does “extensive” mean?). Yet the environmental-protection words and phrases wax positively poetic and rave on throughout the document about “extremely diverse and valuable bird communities” (p. 14), “unique and important area” (p. 14), “high-quality xeric tallgrass community” (p. 16),

“vastly decreases the connectivity of wildlife habitat” (p. 22); etc. Again, in our opinion this document is not an objective analysis of the issues but instead reveals the strong staff bias that many of us have been complaining about for years.

And, perhaps most objectionable, the facts cited seem often to be manipulated in such a way that they support or undermine a desired outcome. This manipulation strains credulity. For example, “Cons” listed for why there should be no trail on the old railroad grade connecting City Limits and the old Marshall Mesa trailhead include “cuts through rare butterfly habitat and an un-fragmented north-facing shrubland habitat” (p. 5). Hey, we’re talking about using an old railroad grade with lots of historic mining activity, folks, not building a new trail through pristine wilderness! Yet people not intimately familiar with the geography, the issues and the opportunities (such as City Council and even the OSBT) might be swayed by this misleading “analysis” of the situation.

These are but a few examples of the unfortunate lack of objectivity that is entrenched in this document. It is impossible to analyze them all in this response. Suffice it to say that the document is quite instructive in (inadvertently?) revealing how deep staff’s biases really go. These biases are clear and pervasive. The message conveyed is that the only legitimate goals for this area are to maximize environmental protection by closing vast areas of OSMP to the public; to accomplish these goals all efforts must be made to minimize the value of the visitor experience, to minimize opportunities for enhancing trails and infrastructure, and to maximize concerns about environmental impacts (even if they are not demonstrable).

Yet the public consensus and Council’s directive to the OSMP Department have been quite clear – the Visitor Master Plan directs OSMP to maximize visitor opportunities while minimizing environmental impacts. That’s what this TSA should have been all about.

It’s so easy to just say no. Will we ever get to yes?

Other public land management agencies conduct analyses for their projects using rigorous, objective techniques. I had hoped that OSMP would start to do so as well. The current document, while better than some earlier attempts, is extremely disappointing and leaves much room for improvement!

We sincerely hope that we are wrong in our analysis of this document, and that as a result of our collective participation in the Marshall Mesa-Southern Grasslands TSA process the Open Space and Mountain Parks Department will indeed incorporate some meaningful additions to the public’s enjoyment and appreciation of this historically-diverse area while still protecting the environmental resources. It is possible, and desirable, to do both. We will remain intensely interested in the outcome.

We will also be watching and participating in other TSA projects throughout the OSMP system, and we hope the standards of objectivity improve in the near future.

Meanwhile, BCHA stands by the detailed recommendations we made in our July 15, 2005 letter for the Marshall Mesa – Southern Grasslands TSA.

Thank you for your attention to our concerns.

Suzanne Webel
BCHA External Vice President, Trails and Public Lands Chair