

May 6, 2004

**BCHA's Response to the OSMP Visitor Plan Community Group Questions**

The Boulder County Horse Association (BCHA) values the privilege of having equestrian access to City of Boulder Open Space and Mountain Parks lands, as well as to other public lands in Boulder County. We are committed to being informed about the issues involving public land management, to educating our constituents about being responsible stewards of the land, and to participating knowledgeably in public discourse about matters of concern to equestrians.

In general we agree with the responses to these same questions that have been formulated by BATCO. There are a few instances where equestrian interests are somewhat unique and a few instances where we believe BATCO has not reached internal consensus.

For an introduction to BCHA and an outline of what we presented to the VPAC-2, please see the handouts attached, dated March and April, 2003.

**What interests does your group have that you would like to see met in the final recommendation?**

BCHA wishes to preserve and enhance the quality and extent of our experience horseback riding on Open Space and Mountain Parks lands.

We value having the opportunity to ride on loop trails and trails of varying lengths, in a variety of terrains and environments. We want to see regional trail systems that connect OSMP trails to those on other jurisdictions.

We value the opportunity to ride off-trail in certain areas and it is very important to us to retain that opportunity, even though the vast majority of all OSMP visitors stay on designated trails.

Safe, high-quality trail experiences are extremely important for equestrians.

**Given those interests, what parts of the draft plan satisfy those interests and what parts do not?**

A Visitor Plan should be a positive statement of opportunities for visitors, emphasizing the benefits of the public land program to the public. If it evaluates constraints and

regulations on the public in the context of the benefits, it will be accepted and will be successful. If, however, it dwells only on threats, fears, and regulations, the chances for its success are lower. We continue to be concerned that this plan, while somewhat improved in tone over the Visitor Plan Advisory Committee material, is unduly pessimistic about the current and future condition of OSMP. It is substantially a "Visitor Restriction Plan" and does not genuinely acknowledge the benefits and opportunities Open Space and Mountain Parks offers the public.

The Boulder City Charter outlines eight purposes for Open Space and deliberately does not prioritize them. However, the 2004 Draft Visitor Plan states that in cases of uncertainty or conflict, preservation of natural ecosystems will take priority in decision-making. In fact, as far back as 1994 the Draft Long Range Management Policies contained this language and was soundly rejected by the public and Council, which passed a version directing staff to consider natural ecosystems in decision making (a much more palatable philosophy with which we all agree). We believe the blanket statement or philosophy of overarching protectionism is not supported by the City Charter. There will always be uncertainty and there will always be conflict; in some cases resource protection should take priority and in some cases other interests should take priority. Therefore we would like to see this paragraph (p.24) amended to incorporate flexibility and balance in decision-making.

Boulder citizenry and staff have searched for many years for an elusive balance between resource preservation and passive recreation. If the proposed area designations are maintained as shown on Draft Map 3.1, 43% of the entire system would be regulated primarily for habitat conservation, with only 9% for passive recreation. We submit that that ratio is not an acceptable balance. Also, there are many properties in the eastern part of the system that are primarily agricultural which are not designated as such on Staff's draft map. We have no problem with the 39% shown in the draft document as Natural areas, a blend of management strategies. Therefore, we have made an attempt to show what we believe is more sustainable balance, as shown on the attached modified Map 3.1.A. If these categories are accepted by the Community Groups, the ratios would become approximately 12% Recreational, 40% Natural, 11% Agricultural, and 37% Habitat Conservation.

We would like to modify the proposed definition of "passive recreation" to state that it "does not significantly impact cultural, scientific, or cultural values" (p. 5); the proposed definition's use of "adversely" is an impossible bar to meet and will unfairly preclude any future passive recreation opportunities.

We take issue with the statement that "over 72% of OSMP property is currently open to public use" (p.7). While that number may be legally or statistically true, we contend that at least 60% of OSMP property is surrounded by perimeter fences and locked gates, making more than half of the entire acreage de facto closed to the public.

We are concerned that the inventory of social trails is inaccurate and exaggerates the problem (pp. 9-10). In our experience many of the social trails shown by staff are not

there, or are something other than social trails. We would like to work with staff and the other stakeholder groups to reach consensus on the extent of social trails on OSMP.

We believe that user conflicts are not as significant a problem as some individuals would have us believe (p. 18). Equestrians typically do not have a problem with hikers, dogs or bicycles on trails, and we believe that we all need to educate our constituents on proper trail etiquette as a means of getting along together.

We believe strongly that management decisions must be made on the basis of good data, rather than assumptions and extrapolations. Standards, objectives and goals should be defined clearly and quantitatively, so that everyone will know what they are and when they have been met (or not).

We would like to see a commitment to more timely evaluation of new properties (p.48), so that decades do not continue to pass before land acquired can be opened to the public.

We are concerned that the management strategies are too inflexible, especially regarding the Habitat Conservation Areas (HCA's). For example, many of the areas proposed for HCA status have never gone through an area management plan. Some HCA's have trails now and some do not; the draft plan proposes that new trails will not be allowed in HCA's and that only on-trail use will be allowed in HCA's, thereby defining a recipe for closed space. We propose instead that the concept of "HCA" means minimal trails but not no new trails at all. We suggest that all areas proposed for HCA status be subjected to a timely area management plan so that sensitive habitat can be mapped. Those areas within an HCA deemed truly sensitive may be closed to all visitors, but other areas within an HCA should be considered for trails and continued off-trail equestrian use.

We would like the list of "Off-Trail Activities" examples amended to include equestrian (p. 45).

We would like to see an ongoing process for future access and trail-related decisionmaking, including social trails, that includes representatives of the stakeholder groups. The public should be invited to make recommendations for new trails; volunteers and public/private/community partnerships should be encouraged.

We are skeptical of the proposed off-trail permit system and believe such a concept is unnecessary and impractical (p.28). There has been essentially no public discussion of this idea until now, and we were surprised to see it appear in the text at this late date.

We do not support user fees on OSMP (p.32). Experience on Mountain Parks and other jurisdictions such as the Forest Service has shown that such programs cost more to administer than they are worth, and like import tariffs, engender public resentment of the program. If this proposed policy must remain an option, the sentence should be amended to read "Open Space and Mountain Parks may [not shall] implement visitor access and use fees...."

The pace of acreage acquisition has far outstripped the rate of new trail construction on OSMP lands. We would like to see this imbalance rectified by the construction of a few strategic trails. We would like to see the Visitor Plan include specific annual dollar commitments for new trail construction, not just for trail maintenance.

**Offer specific suggestions your group recommends be adopted by the plan; that is, what would you rather see instead:**

We submit the attached map (modified from Map 4.2) showing BCHA's new trail priorities. You will note that with a very modest number of new trail miles, the original vision of an interconnected trail system around the City of Boulder – which was one of the driving factors in establishing the Open Space program many years ago – can be realized.

The Priority New Trail additions we would like to see added were selected to minimize impact, maximize the visitor experience, and be cost-effective to build. These include a loop south of the Flatirons Vista Trailhead; a loop from the Doudy Draw to the Denver Water Canal and back utilizing in part the old railroad grade; a connection from the current end of the South Boulder Creek Trail to the Community Ditch crossing of Hwy 93; a connection south and one east from the “Coal Creek” alignment; a rail-trail conversion of the UPRR Boulder-Erie line; completion of the East Boulder Trail from Gunbarrel to Lookout Road; the Axelson Trail from Monarch Road to North Rim; and the West Beech Trail connecting the Foothills Trail to the Left Hand Trail and to Boulder County's Heil Valley Ranch. We propose that the first two Priority Trail Additions mentioned above be open to pedestrians and equestrians only; all others should be multi-use trails.

If formal trails are not designated or constructed there, we would like continued off-trail equestrian access to the North Foothills, Tallgrass Prairies East and West, Southern Grasslands, Eldorado Mtn, and Jewel Mtn areas.

Two of the “red dot” trails shown on staff's Map 4.2 are not acceptable to BCHA. These are the “Highway 128 alignment” and the “Baseline Road segment” of the Dry Creek Trail. Staff's proposed alignments are fundamentally unsafe for all trail users, require easements on land not owned by OSMP, and offer nothing in the way of a quality visitor experience. Both are easily replaced by more satisfactory alignments on OSMP lands, as shown.

We are concerned about using the Boulder Feeder Canal as a year-round trail. Between April 1 and Nov. 1 the water flows deep, fast and cold. It flows over baffles and under siphons, just as the “certain death will result” signs posted along it indicate. Anyone who were to fall in the canal would have a very difficult time getting out safely because the banks are loose and steep. Furthermore, it is a very narrow corridor, with no “escape room” should a horse become spooked by, say, a baby jogger or a speeding bicycle. This trail alignment is not the “magic bullet” some people may represent it to be, and should be evaluated very carefully.

## **Summary**

We appreciate the hard work that Staff, the Open Space Board of Trustees, Boulder City Council, the Visitor Plan Advisory Committee, the other stakeholder group representatives, and the public at large have put into this planning process. We appreciate having the opportunity to participate actively in this Community Group process and we look forward to reaching a mutually-acceptable joint recommendation on the Visitor Plan.

Respectfully submitted,

**Suzanne Webel**

External Vice President; Trails & Public Lands Chair

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