



# HORSE ASSOCIATION

The Voice for Horses and Horse People in Boulder County

May 12, 2004

# BCHA's Response to the OSMP Visitor Plan "Detailed Descriptions of Management Subareas" and "Selected Key Management Actions for OSMP Management Subareas"

Since the "Selected Key Management Actions" table is essentially a distillation of the larger and more complete "Detailed Descriptions of Management Subareas," our comments will refer to the latter document.

Overall, we appreciate having the the descriptions follow the format of natural resource evaluation, recreational use evaluation, management issues, and recommended management actions. This approach at least makes an attempt at standardizing the various aspects of each of the areas. However, we note again that detailed attention is paid to the natural resources and possible threats to these resources, with only grudging acknowledgement of the potential recreational benefits or opportunities. Some areas appear to be treated more leniently than others for non-objective reasons. Quantitative assessments need to be made, and more quantitative standards (such as limits of acceptable change) should be be applied to all proposed management actions.

Generally, we believe that management actions regarding undesignated trails will be the thorniest problem OSMP and the public will have to resolve in the near future. While we will wholeheartedly support closure of some duplicative or unsustainable social trails, many have evolved in excellent locations and should be designated as official trails or should merely be allowed to remain for future generations to explore and enjoy. This is an issue where the OSMP should enlist the ongoing participation of all stakeholder groups and should make decisions on a trail-by-trail basis, making haste very, very slowly.

Unless singled out herein, BCHA generally accepts the assessments of staff and its recommendations.

## Western Boulder County RRA. OK.

## **<u>Lefthand Canyon RRA</u>**. OK.

**Boulder Valley Ranch RRA**. Boulder Valley Ranch used to support an active horse livery operation, as well as a boarding and horse show grounds. The outdoor arena is a public-access facility, although in recent years the lessee has inappropriately closed it to equestrians outside his immediate personal circle of friends. We point out that Mesa Reservoir now has intermittent open water (as opposed to many years ago when it was a functioning reservoir). Dogs should be allowed on Voice & Sight on the north half of the Sage Trail Loop (Map 3.2; p3).

**Wonderland RRA**. OK.

Sanitas Valley / Red Rocks RRA. OK.

Elephant Buttress RRA. OK.

<u>Flagstaff / Chautauqua RRA</u>. OK. We support an off-road mountain bike (multi-use) trail corridor from the front side to the back side of Mountain Parks (p.8).

<u>South Mesa RRA.</u> OK (p.8-9). This is an extremely important equestrian area. We need designated and enforced horse trailer parking at the South Mesa Trailhead (often passenger cars fill the marked trailer parking area, resulting in equestrians having to park elsewhere). The proposal mentioned later in the document refers to moving horse trailer parking to Greenbelt Plateau. This is not an acceptable proposal.

West Marshall Mesa RRA. We are ambivalent about the proposed suspended platform underpass from Marshall Mesa to the Community Ditch Trail under Hwy 93, as this idea may work for pedestrians and bicycles but will certainly not work for equestrians. Nor are we excited about using the new traffic light at the intersection of Hwy 128 and 93. Merely getting a horse close enough to the control pole to stop traffic on Hwy 93 would be a death-defying feat. We have long advocated a better multi-use trail connection using the existing box culvert under Hwy 93 somewhat farther south, with a connection east to the Greenbelt Plateau Trail, one south to the Flatirons Vista Trailhead, and one west to Doudy Draw at Community Ditch. This underpass connection was proposed by BATCO in 2000 and was approved by the OSBT. If pedestrians and bicycles are diverted to the Community Ditch underpass and the Hwy 128 traffic light, we (equestrians) still need to be able to use the box culvert and connections – therefore we either need these trails built or we need to be able to continue our off-trail use here (p.8-9).

The existing Marshall Mesa trailhead is obsolete, too small, too close to Marshall Road, and near a functioning wetland. We propose moving this trailhead westward to a flat, disturbed site immediately adjacent to the vacant new office building, and building a 0.8mile trail connection to the existing Marshall Mesa Trail along the old railroad grade. This site offers greater safety, better access, excellent views both eastward and westward)

and more space (including horse trailers, rest rooms, and possibly picnic tables). Enhancing the trail along the railroad grade would offer recreational opportunities for disabled visitors.

<u>Dry Creek RRA.</u> The text says that "at some point, this property will be connected to the Bobolink Trail and the proposed extension of the East Boulder Trail from Boulder Reservoir to Teller Farm." [Note: we assume staff means "Baseline Reservoir", not Boulder Reservoir.] We support a trail from Dry Creek southwest, but not the one proposed by staff squeezed between the shoulder of Baseline Road and the lake. This is a bad, unsafe alignment and OSMP doesn't even own the land or an easement. Instead, several years ago BATCO formally proposed an alignment extending southwest on OSMP land utilizing existing farm roads and bridges, to the intersection of South Boulder and Cherryvale Roads. We believe this alignment would offer a safe, high-quality visitor experience with minimal impact and minimal cost. The OSBT at the time directed staff either to get their alignment built within the year or to accept BATCO's proposal – but many, many years have now gone by with no progress. We find this impasse unacceptable.

We support a trail from Dry Creek northeast to Teller Farm utilizing OSMP properties, and possible future off-road easements, NOT road rights-of-way or the rail-with-trail concept along the Burlington-Northern line proposed by Boulder County Transportation.

Rest rooms and picnic tables should be added to the Dry Creek Trailhead, and it should be expanded and landscaped (p.10-11).

#### Natural Area (NA) Recommendations

Northern Tier NA. Formal closure of these properties would finally acknowledge the expanding inventory of Closed Space system-wide. If "visitor use management plans and visitor use facilities" are to be required before opening these properties, there should be a specific time frame given for these studies – an open-ended, indefinite delay is not acceptable (p.11).

**East Beech NA.** In contrast to staff's assertion that "undesignated trails now spur off the designated Lefthand Trail", we beg to differ. There is some dispersed equestrian activity, but significant social trails have not, in fact, developed here. If new trails are built, they should NOT be too "close to the periphery"! (i.e., trails near Highway 36 are not acceptable); however, we would support another trail somewhere in the vicinity so that visitors could choose to make a loop experience (p. 12-13).

Sanitas NA. OK.

Anemone Hill NA. OK.

Flatirons / Mountain Backdrop NA. OK.

**Shanahan Ridge NA**. We support clarification of public access and a new trailhead on Shanahan Ridge (p.16).

**Doudy Draw NA.** BCHA constructed the Doudy Draw Trail in the mid-1980's and has been maintained it annually ever since. This entire area is a very important equestrian resource. To the extent that undesignated trails may be increasing here, visitors are voting with their feet (or hooves) – and the social trails that have evolved are, for the most part, in pretty good (sustainable, low impact) locations. We question the notion that "multiplying undesignated trails are further dissecting large habitat blocks, with the quality of habitats being degraded by uncontrolled access and off-trail use." It is true that "The lack of a sustainable trail system... supports continuation of this situation." We submit that the amount of use is not significantly fragmenting wildlife habitat but has provided an very significant equine habitat. Either designate the existing social trails for pedestrians and equestrians, or just leave them alone! (p.16-17).

We support reconstruction of both the Doudy Draw and Flatirons Vista Trailheads to offer designated horse trailer parking. There is ample room in both locations to accomplish this objective. Along with Greenbelt Plateau TH, the existing structures are unattractive barren rectangles, and should be redesigned with angled trailer pull-throughs, landscaping and rest rooms (see many BCPOS trailheads for examples of how to do them right). As indicated above, merely relocating horse trailer parking to Greenbelt Plateau is unacceptable, and the proposed pedestrian/equestrian crossing of Hwy 93 at the Hwy 128 intersection is not acceptable either. Please see our recommendations above for trail improvements to the existing box culvert under Hwy 93 north of Hwy 128.

<u>East Marshall Mesa NA</u>. We support construction of a new trail connection from Marshall Mesa eastward to Superior and Coal Creek (p18). Move the Marshall Mesa Trailhead west as described above.

<u>South Boulder Creek NA</u>. The separate hard surface trail is open to bicycles (but not horses) from Baseline Road to the East Boulder Recreation Center. Horses have a short segment of dedicated trail south of Baseline Road, which merges with the crusher fines pedestrian trail where it crosses the East Boulder Ditch. The popular Bobolink Trailhead should be redesigned and landscaped, with rest rooms added. A new trailhead should be constructed at the south end of this trail near Marshall Road and Hwy 93 (p. 18-19).

<u>East Boulder NA</u>. We support development of a trail system for the O'Connor-Hagman and Steinbach properties (p. 20). We support continuation of fishing on the Suitts Pond (why not? There aren't many opportunities for fishing on OSMP).

<u>Creek Confluence NA</u>. Both Sawhill Ponds and BCPOS' Walden Ponds are popular equestrian venues (p.21). We usually park horse trailers at Walden Ponds, and we appreciate the existing connections between these properties.

We would like to remind readers that BCHA, BATCO and the Boulder County Comprehensive Plan have placed a very high priority on a rail-trail conversion of the UPRR Boulder-Erie Line, which passes through this area, yet it received nary a mention in staff's management document.

<u>Valmont Reservoir NA</u>. We support development of nature trails at Ute Industrial Park and a cultural resources trail at Valmont Butte (p. 22).

<u>Diagonal NA</u>. We support the long-sought trail connection between the Fourmile and Cottonwood Trails (p. 23), as well as between Gunbarrel and IBM/Coot Lake.

<u>Gunbarrel / Heatherwood NA</u>. The language in this section ("assess how to deal with undesignated trails around the Gunbarrel and Heatherwood subdivision... monitor, assess, and determine whether or not any restrictions on visitor access should be implemented..." seems softer than elsewhere for the same issue (p. 24-25).

Outlots. More de facto closed space (p. 25).

## **Agricultural Area (AA) Recommendations**

**East Boulder Valley AA.** We support the long-sought "East Boulder Trail from Dry Creek to Teller Farm" and want to see a specific – and short – time fram for construction of this important alignment (p. 26).

<u>North Boulder Valley AA</u>. We note that the only reservations mentioned by staff regarding the Boulder Feeder Canal pertain to water quality (p. 27). We must point out once again that there are serious user safety concerns regarding public use of this feature (including baffles, siphons, steep and unstable banks, and deep, cold and swift water). We want to see the Axelson Trail built from Monarch Road to the North Rim Trail.

#### **Habitat Conservation Area (HCA) Recommendations**

North Foothills HCA. This entire area is an important and existing equestrian resource, and contains an extremely important (nay, the only feasible) off-road trail connection from Boulder to BCPOS Heil Valley Ranch. To the extent that social trails have developed in this area, they are all on old ranch roads, the railroad grade, or former Beech roads. More than 80% of the entire trail system is already in place; the only construction needed (20%) consists of an easy, large "S"-shaped switchback southwest of the McGuckins warehouse to connect the existing railroad grade to the existing road system. We disagree that the topography precludes constructing sustainable trails in this area (p.28-29). If there were a will to construct this trail, there could be a very easy, inexpensive way to do so.

We also disagree that this property contains such rare undisturbed ecosystems that it needs to be closed entirely to the public. As recently as 1996, staff's own mapping showed no sensitive natural resources on the North Foothills property. More studies can always be generated to create the semblance of new justifications for a predetermined management action. Just a few years ago we thought tstaff was finally leaning toward recommending a single long trail on West Beech as described above. We view the current draft recommendation of complete closure as unfair backpedaling.

Finally, Bob Joder sold OSMP a strip of land on the west side of his property specifically to enable a trail connection from "West Beech" to "Buckingham Park." This parcel is not even shown on the Draft VP maps, and should be. Joder also sold BCPOS a chunk of land near Hwy 36 and Six Mile Fold to be used as a trailhead for this trail system. Not to dedicate these properties for trails and trailheads could be construed as a misuse of public funds.

Therefore, we strongly oppose the recommended management actions of "not constructing any new trails" and "formally closing the railroad grad as an undesignated trail" and "eliminating undesignated trails in the West Beech and Palisades areas" (p.29). That strategy is merely a thinly-veiled ruse to achieve more Closed Space.

Development of the Boulder Feeder Canal is NOT an alternative to the West Beech Trail!

We want to see this property reclassified as a Natural Area (NA), with continued off-trail equestrian access if no designated trail is constructed in the near future.

## Western Mountain Parks HCA. OK.

<u>Tallgrass Prairie West HCA.</u> This is an attractive area that is not suffering from undue recreational pressure. We would like to see some existing social trails designated.

We would like to see this area reclassified as a Natural Area, and off-trail equestrian and pedestrian use continued (p. 33).

**Eldorado Mountain HCA.** This area is large enough to provide large blocks of undisturbed habitat as well as some recreational use; it is especially important to equestrians. We propose that the area west of the Denver Water Board Canal remain as an HCA but the area east of that be classified as a Natural Area.

We support designating portions of the existing railroad grade, the Denver Water Board access road system, and certain existing social trails, in this area, for pedestrians and equestrians. Depending on other management outcomes, we could support not designating any of the existing social trails west of the Denver Water Canal (p. 34-35); however, we wish to continue off-trail equestrian access in the eastern portion of this block.

<u>Jewel Mountain HCA</u>. This subarea is indeed more de facto Closed Space at the present time, which is a shame because it offers exceptional equestrian opportunities, largely on existing ranch roads and other features including the Denver Water system (p. 35-36). Until a definitive management plan is completed for this and other foothills and prairie properties, we do not support closing them for dispersed public access such as off-trail riding activities. We support Jefferson County's trail proposal and hope that OSMP will cooperate with them in creating a meaningful trail system here, complete with connections eastward to Rocky Flats.

While we are intrigued by various aspects of the Front Range Trail project, we do not support any proposal containing an alignment for the FRT near Highway 93.

<u>Southern Grasslands HCA.</u> Equestrians have long considered this area part of our "habitat," as there used to be a livery along Coal Creek Drive that offered hourly trail rides on the Varra and Telleen properties, until OSMP purchased the land under it and extinguished it. We appreciated the opportunity to ride off-trail in this large valley, until OSMP installed cross-fencing along Coal Creek and arranged with an inholding owner to report equestrian use. It has now become a vast expanse of de facto Closed Space.

We have adamantly opposed construction of a Highway 128 trail in the CDOT right-of-way and cheered when CDOT turned OSMP down with its ill-advised application to build a trail there. It is dangerous and offers little in the way of a quality user experience. Having said that, we would support a trail from the Coalton Trail to the Greenbelt Plateau Trailhead if it were pulled northward away from the highway by some acceptable buffering distance. There still would be a lot of valley left for pronghorn.

As detailed above, we are not thrilled with the Greenbelt Plateau Trailhead nor with the at-grade crossing of Hwy 93 at 128. We don't appreciate the language in this document that says "Open Space and Mountain Parks had proposed a trail connection using an existing underpass to connect the Greenbelt Plateau trailhead east of Highway 93 to the Flatirons Vista trailhead west of Highway 93, but the new pedestrian-activated stoplight with a new short connection to the Doudy Draw Trail will take its place." (p. 37). In fact, it was BATCO that proposed this trail connection, the Open Space Board of Trustees approved it, and we want to see it get built.

Certainly, any new trail that crosses Coal Creek on the Arsenault property will provide a new trail link for more than just Superior residents! (p. 37).

Tallgrass Prairie East HCA. The Gallucci, Church, and Davidson Mesa properties have long been used by equestrians who live in Spanish Hills and nearby areas. Unilateral closure of these properties by OSMP in the name of prairie dog conservation was wrong and should be reversed. The text mentions that undesignated trails have developed "and one of these trails lead[s] all the way down to Cherryvale Road." (p. 39). Well, gasp! There SHOULD be one designated trail that does lead all the way down to Cherryvale Road! This area is near Highway 36 and offers not only a trail connection across Hwy 36 at Cherryvale or under it using the Goodhue or Davidson Ditch culverts,

and a connection to the South Boulder Creek and Dry Creek trail systems at Cherryvale and South Boulder Roads, but also offers an excellent opportunity for visitors to experience the tallgrass prairie and drop-dead views of the Flatirons and the Boulder Valley.

There is no evidence that dog-training, off-trail equestrian use, or model glider flying have had any adverse impact on the Church property. We do not support closing this area.

Even though Wildflower Ranch is an equestrian facility, we do not believe it or anyone else should be awarded special treatment. Rather, we believe neither the Wildflower equestrians nor the residents of that subdivision are causing a problem along South Boulder Creek, so we suggest merely leaving well enough alone. In the larger picture, we do not support a selective permit system on OSMP.

**Sombrero Marsh HCA.** OK (even though this area used to be another livery, Sombrero Stables, which offered extensive hourly trail rides and lessons on OSMP property and on what is now Sombrero Marsh itself, which was merely a dust bowl until runoff from the "Reserve at Cherryvale" filled it!) (p. 40).

## Cottonwood Grove HCA. OK.

<u>Lower Boulder Creek HCA</u>. We support the existing uses described for the Teller Farm / White Rocks/ East Boulder Trail and the Gunbarrel Hill properties, including continuation of some off-trail riding in the Gunbarrel Farm area (p. 42).

However, documentation of proposed management actions in this area is not complete without a thorough discussion of the Union Pacific Railroad Boulder to Erie Line, which would provide an excellent rail-trail conversion with minimal environmental impact and minimal expense. This line is all but abandoned, with all road crossings asphalted over and marked "Exempt". This rail-trail has consistently scored at or near the top in the Boulder County Comprehensive Plan Trail component, and we want to see OSMP support it as well.

#### **CONCLUSION**

Thank you for the opportunity to comment on the "Detailed Descriptions of Management Subareas."

Respectfully Submitted,

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