

Ms. Christine Walsh
District Ranger
USDA Forest Service
Boulder Ranger District
2140 Yarmouth Ave.
Boulder, CO
80301-1615 Dec. 28, 2003

Dear Christine and Planning Staff:

Following are some comments on behalf of the Boulder County Horse Association pertaining to the proposed reorganization of recreation at the Brainard Lake area.

- 1) We appreciate existing and future equestrian and other non-motorized recreation opportunities on the Boulder Ranger District. We believe that we are good stewards of the land and that equestrians represent neither unacceptable environmental degradation of ecosystems nor unacceptable user conflicts on trail systems. The equestrian community has already seen our habitat shrinking due to increased urbanization of the Front Range. We do not want to see our National Forest "habitat" (e.g. access) diminished further during your planning process.
- 2) We appreciate the validity of some of the proposals outlined by the Forest Service for the Brainard Lake Recreation Area, and we appreciate having the opportunity to weigh in on the plan.
- 3) We are concerned about the possible reasoning behind some of the proposed changes. We urge the Forest Service to base all its planning efforts on realistic and reasonable science rather than on fears and assumptions. For example, it would have been helpful to know, not only how many people currently use the area, but how many (of each type) are projected to do so in the future? What are the measured impacts of the current use (on the lake, on the creeks, alongside the trails, on the air, whatever), and what are the impacts are projected to be in the future? If visitor conflicts are the perceived issue, what data have been collected to justify that concern? What efforts have been taken, if any, to mitigate or minimize those concerns? Of the 100,000 people currently using the Brainard area annually, how many are actually concerned about their experience? Or is this planning effort driven primarily by staff's concerns?

During my conversations with Forest Service personnel at the open house on Dec. 11, I was told that the management changes are being proposed because of "the potential for user conflicts" -- not that user conflicts are occurring now at an unacceptable rate, or that some study has shown that they will be worse in ten years, just that there is a possibility of their occurrence -- which doesn't seem to be a justifiable reason for overhauling the whole place. I was also told that there are no data on impacts, existing or projected -- just a concern" that there "might be" impacts, now and in the

future. Again, not a justifiable reason for the drastic proposed overhaul of Brainard Lake. I was told that we need "to reduce the number of visitors to the wilderness behind Brainard Lake" -- but when I pressed a little, was told only that the proposed plan was being implemented because there are too many people up there who don't appreciate the wilderness experience "properly." Who is to determine whether they are, or are not, appreciating it in their own way?

To one of my questions about equestrian use, I was told that "this area is rapidly becoming like an open space park so we have to impose open space park-like restrictions on people." Well, fortunately, it isn't an open space park and, anyway, most open space parks still allow equestrian use!

Finally, I was told that there were "some" concerns expressed by visitors about the quality of their experience -- but when I asked for more details, I was not satisfied with the actual existence of data to back up the assertions. Out of 100,000 visits annually, have there been two complaints? two hundred? -- there seems to be no way of knowing. Again, this undefined level of concern doesn't seem to justify a major outlay of tax dollars, inconveniencing of the public, and the not-inconsiderable environmental impact of moving existing infrastructure around. What alternatives have been considered that might be less drastic than uprooting entire campgrounds and installing shuttle buses? I got the impression that the major decision(s) have already been made, and that the meetings and public input process were mere formalities in the process. This is a shame, because my other recent experiences with the Forest Service have been more objective and more productive.

- 4) Having said that, I believe it is possible to find some areas of agreement. The proposal to remove the road around the south half of the lake will certainly render it a more scenic, less-disturbed area, and will reduce impacts on the land there. I appreciate the excellent suggestion of putting a designated trail around Left Hand Park Reservoir -- it's a beautiful lake, and would provide alternatives for people to help disperse pressure on Brainard Lake itself.
- 5) If you are intent on opening a new campground near Red Rock Lake, consider making it an RV/Vehicle campground, and converting the existing Pawnee campground at Brainard to a tent-only site. In my experience these types of camping experience are so different that they do not mix well. This separation would reduce overall vehicular traffic at Brainard, and would eliminate high-profile vehicles, but would still allow tent campers to drive to the existing campground. And it would utilize existing facilities, instead of tearing them out and starting over in a new location. However, are you not concerned that a new campground facility near Red Rock Lake will exert new environmental pressures on that lovely body of water also? (I actually like it pretty much the way it is now, off the beaten track but not inaccessible).
- 6) The entire Brainard area needs to have a separate, and independent, trail system management plan. What is up there now is a hodge-podge of trails that don't make

sense and don't offer the best they could offer in quality user experiences. I suggest that staff sit down with representatives of legitimate recreation groups to work out the details.

I am not in favor of obliterating existing trails from maps, as has been suggested for the Niwot Ridge Trail. What is the problem with this trail? I couldn't find out. This is a historic alignment, but is rugged enough that most people won't attempt it. Therefore, I suggest that the FS put up a sign at the bottom that says "difficult trail, steep, rocky terrain ahead" or something like that. Don't fix it if it ain't broke. Similarly, it appears there is a proposal to close the old Sourdough/South St. Vrain loop when the new cutoff is completed. Why not leave a loop for people to enjoy? There aren't very many other loop trails in this area, and in general loop trails provide better experiences for people than out-and-back lines. Fix this one if it needs fixing, rather than closing it completely.

If social trails are a problem near Long Lake or Mitchell Lake, work on obliterating the social trails, maintaining the designated trails better, installing signage or other educational means of preventing the problem from recurring in the future. Don't just move the parking lot miles away in an attempt to inconvenience people enough that they won't use the area.

Consider temporal restrictions on vehicle access, rather than closing the area completely. For example, let people drive to the Brainard, Long and Mitchell trailheads during the week when traffic is low, but install a shuttle system if necessary on weekends if traffic is high. That way, people might be able to choose to visit the area midweek, distributing overall visits more evenly and reducing pressure on the existing infrastructure.

The Sourdough Trail was constructed "to draw people to recreational opportunities outside the Indian Peaks Wilderness Area." Well, the Sourdough Trail is borrrrrring, for the very reason that the Indian Peaks Wilderness trails and other historically-used alignments are more interesting -- because those trails go where people want to go. Please help make the Sourdough Trail more interesting! For example, right now one can't see the forest for all the trees. Removal of a few trees at strategically-placed intervals would open up dramatic viewsheds with minimal environmental impact. Work on making the Sourdough Trail connect to Allenspark (the mythical "Section 11 connection"). Rumor has it that there is already a trail there. Designating it and improving it would make the long-cherished dream of a regional north-south trail in the mountains a reality.

Please consider a "west side bypass trail" that would get people around the Brainard Lake area itself without adding to the congestion. This would be especially helpful for horse people who want to get up into the Indian Peaks Wilderness, but who cannot because it would mean traversing a Developed Recreation Area where horses have been banned. Similarly, if you expand or change the boundaries of the existing Designated Recreation Area along the south, east, or north sides, we request that you

do so in such a way as to continue to accommodate horses on the major trail systems such as the Sourdough Trail, South St. Vrain Trail, and others.

Finally, please build in horse trailer parking sufficient to accommodate those equestrians who wish to continue to enjoy the Brainard Lake area.

Thank you for giving us the opportunity to provide our input. We hope you will keep BCHA in mind as an equestrian resource in your planning efforts.

Sincerely,

Suzanne Webel
External Vice President
Trails & Public Lands Chair