

USDA Forest Service
Arapaho/Roosevelt National Forest
Boulder Ranger District
2140 Yarmouth Ave.
Boulder, CO 80301-1615

April 17, 2003

Subject: Comments on the 2003 Environmental Assessment for Caribou and West
Magnolia Travel Management Plans

On behalf of the equestrian community, Boulder County Horse Association (BCHA) would like to offer some comments on the recently-issued Caribou and West Magnolia Environmental Assessment.

We have been involved in this planning process for many years, because the issues and opportunities it represents are very important to horse people both in the mountains and the rest of Boulder County. As you know, we were seriously concerned about the process and proposals in the 1999 Travel Management Plan for Winiger, West Magnolia and Caribou. We are pleased that the Forest Service paid attention to those earlier concerns, revised the evaluation process, and has now come up with a set of much more viable options for the latter two areas (we look forward to working with you on the Winiger plan in the future).

At this time, we are pleased to support Alternative C as the best Travel Management Plan for the Caribou and West Magnolia areas of Arapaho/Roosevelt National Forest.

We agree that it is desirable and necessary "to designate a road and trail system that provides for sustainable long-term management of natural resources while providing quality recreation experiences in the Caribou and West Magnolia TPAs" (Ch1,p2). However, we note some discrepancies between your subsequent proposed action #5, Ch1,p2-3 and 5 ("restricting mechanized...and equestrian use to designated roads and trails") with ALL the detailed subsequent criteria discussed in the analysis, including the following examples:

- Ch2, p4, Design Criteria Common to Alternatives B and C "restrict mechanized (bicycle) use to designated trails (off trail and off road travel is prohibited)"
- Ch3,p 8,9, Caribou Travel Planning Area, Alternative B - Revised Proposed Action, "The proposed transportation system restricts motorized and mechanized (bike) travel to classified PFSRs and trails" and Alternative C, "The proposed transportation system restricts motorized and mechanized (bike) use to classified PFSRs and trails"
- Ch3,p10,11, West Magnolia Travel Planning Area, Alternative B - Revised Proposed Action, "The proposed transportation system restricts motorized and mechanized (bike) use to classified PFSRs and trails" and Alternative C, "The proposed transportation system restricts motorized and mechanized (bike) use to classified PFSRs and trails"
- Ch3,p14, Wildlife Environmental Impacts, "The proposed treatment activities would increase habitat effectiveness by discouraging and or eliminating motorized and mechanized use on all but designated roads and trails."

BCHA believes that it is proper to classify equestrian and pedestrian activities together, as the Forest Service does for Wilderness Area management and Boulder County Parks and Open Space does for its park management. We hope that this is

actually what you had in mind. We agree with the principle of educating and encouraging all trail users to stay on designated trails, but we value the historic tradition of dispersed recreation opportunities for hikers and horseback riders, and we don't believe our occasional off-trail use has created undue problems on the Forest. There do not appear to be specific areas in this project area where you deem it necessary to restrict all users to designated trails. Therefore, we recommend that you change the introductory text to be consistent with the subsequent and more detailed Chapter 3 material regarding trail use.

We agree with the conclusion that Alternative C will improve or maintain Wildlife Habitat Effectiveness and other resource conditions (Ch.2, p.6), indeed that it will increase habitat effectiveness slightly over Alternative B (Ch3,p14), and will provide some long-term benefits to some sensitive plants and their habitats (Ch3,p18).

With regard to the West Magnolia area and parts of the Caribou area, we agree with the analysis and recommendations of the Boulder Area Trails Coalition (BATCO). It is especially important to keep some loop trails open in each of these areas, as well as a few trails that will connect to other parts of the Forest. We recommend that CR128J be kept open year-round to non-motorized and mechanized travel, but closed seasonally to motorized travel. In the Rainbow Lakes area we trust that the short new trail proposed to bypass the campground will be open to equestrians.

Finally, BCHA is especially pleased to support Alternative C because it designates the Switzerland Trail as a Public Forest Service Trail (PFST 141.1). As you know, we have worked closely with Boulder County Parks and Open Space, and with the Guercio family, on the Caribou Ranch planning. This effort resulted in this National Historic Landmark being designated as a public trail open to pedestrians and equestrians up to the Forest Service boundary. The BCHA Board was unanimous in approving a recommendation to "adopt" the Switzerland Trail at Caribou Ranch, and we enlisted support and financial help from the Roundup Riders of the Rockies' Heritage and Trails Foundation. If Alternative C is confirmed, I will do my best to secure equestrian volunteers and funding to help the Forest Service build and maintain the Switzerland Trail between Caribou Ranch and the Rainbow Lakes Road as well. (One small request: we recommend that you convert part of the existing PFSR 141.1A to a PFST and to designate a short spur from it to the wonderful large "Sourdough Trailhead Parking Lot". This proposal would create a low-impact off-road trail connection from the Sourdough Trail to the Switzerland Trail utilizing mostly existing alignments.)

In summary, BCHA believes that Alternative C will be an excellent example of agencies and stakeholder groups working together to create a high-quality, sustainable travel management system on the Arapaho/Roosevelt National Forest.

We appreciate the Forest Service's thoroughness throughout this planning process. Thank you for giving us this opportunity to provide some comments on the plan. Please look to BCHA as a resource on equestrian planning in the future.

Sincerely,

Suzanne Webel
External Vice President
BCHA