

Ms. Laurie Shannon
Refuge Planner, Rocky Flats National Wildlife Refuge
US Fish & Wildlife Service
Rocky Mountain Arsenal -- Building 111
Commerce City, CO 80022

June 17, 2003

Dear Laurie and RF Planning Team:

Thank you for organizing such a thorough analysis and scoping process for the Rocky Flats National Wildlife Refuge Comprehensive Conservation Plan. On behalf of the Boulder County Horse Association, I would like to take this opportunity to comment on the proposed management alternatives.

Rocky Flats is a spectacular property which offers the opportunity to design a sustainable wildlife-based passive recreation system from the ground up. Its sheer size (6,500 acres) makes it comparable to northern Boulder County Parks & Open Space's Hall and Heil Valley Ranches, and to Jefferson County's White Ranch Park, properties on which multiple objectives are possible and compatible. Rocky Flats is also surrounded by other public land management programs such as City of Boulder Open Space & Mountain Parks, City & County of Broomfield's Great Western Reservoir, City of Westminster's Colorado Hills Park and Standley Lake, and City of Arvada's Leyden Gulch.

Interestingly, like Rocky Flats, most of these programs emphasize environmental restoration and interpretation, as well as wildlife-based recreation opportunities. Like Rocky Flats, many of these properties have been able to capitalize on existing networks of old ranch roads and farmsteads which offer opportunities for recreation alignments and historic interpretation. However, each of those other programs has been isolated from all the others by the unique geography of Rocky Flats. But in fact Rocky Flats was the historic nexus, or connecting point, of many early regional settler trails which often followed existing wildlife corridors. We would like to see Rocky Flats resume its historic role in providing both types of connections. In fact, from a trail standpoint we cannot visualize meaningful regional trail systems ever connecting the properties mentioned above without meeting at Rocky Flats!

Because of its size, BCHA believes that with either Management Alternative B or D there will be plenty of room for undisturbed wildlife habitat at Rocky Flats. To get a sense of the impact of trails, it is helpful to calculate the proposed trail density (miles of trail per square mile of potential habitat). Alternative B (14 miles of trails on 10 square miles of territory) would indicate a trail density of 1.4; for Alternative D (17 miles of trails), the trail density would be 1.7. If one then takes the extreme ("worst case") view that any given trail would create an environmental catastrophe 100 feet wide (which is of course not the case, since trails have but subtle effects on habitat), Alternative B would impact a mere 2.64% of the entire potential habitat at Rocky Flats; Alternative D would affect approximately 3.2% of the entire property. This approach helps both land managers and the public to keep a sense of perspective and objectivity when analyzing the appropriate balance between recreation and environmental preservation.

Therefore, we don't see much overall difference between Alternatives B and D (other than details of specific alignments) -- except that B proposes only two trailhead parking facilities while D proposes as many as six -- and that B proposes to ban horses while D would allow them.

As you know, I attended the Rocky Flats trails focus group session in March as well as the public meetings earlier this month. I listened attentively for reasons that might justify closing this wonderful property to equestrians, but still have not heard a convincing argument for this proposed ban.

The Boulder Daily Camera ((5/7/03) mentioned that you might believe that "horseback riding is not an unmet need in the area" like hunting. On the contrary, we would suggest that due to increasing urbanization of the Front Range, the horse population has declined drastically in the past two decades -- from 16,800 in Boulder County in 1982 to fewer than 8,800 in 1999. One could say that at that rate horses are rapidly becoming the next "endangered species" in Colorado! In order to retain horses as a way of life here for those who seek it, ensuring equestrian access to public lands has taken on a new urgency. We don't insist on access to every trail, but we do request continued access to soft-surface trails, as well as dispersed recreation opportunities on open lands.

We might also point out that bicycling is certainly not an unmet need in the area, since most trails do allow for bicycling, and that bikes can navigate roads safely whereas horses cannot. You are quoted in the same article as saying that "Bicycling is not a priority use, but many people want to access parts of the refuge without a car" as justification for allowing bicycles at Rocky Flats. Well, that same desire describes the equestrian community also! We too would like to experience the Refuge without a car.

On the other hand, the article added that you were thinking of banning horses at Rocky Flats because future trails planned for Broomfield and Westminster "will not allow horses on their trails so the refuge wouldn't need to allow horses for the sake of linkage." Yet the managers of those programs have denied that assertion, and the Camera has subsequently retracted its statement. I hope that you have seen enough need for regional trail connections at Rocky Flats for ALL users that equestrians would be included with other nonmotorized recreationists.

I heard generalized staff concerns that horses might cause trail erosion. Yet I would invite you to compare any trails in the area that are open to horses, to trails that are closed to horses; I believe you will not be able to tell from an erosion standpoint which is which.

I heard generalized staff concerns that horses might spread noxious weeds. I invite you to make the same comparison -- and to speak with Eric Lane, the Colorado State Weed Coordinator, who will reassure you that horses are no more responsible for spreading weeds than water, wind, tires and Vibram soled hiking boots.

Fortunately I did not hear any concerns at the Rocky Flats meetings (although I have heard them elsewhere) that horses might contaminate the water supply with harmful micro-organisms. I have an extensive file of research, which I would be happy to share with you, that shows horses don't even carry the micro-organisms in question (cryptosporidia and giardia), so I'd like to put that concern to rest once and for all.

Fortunately I did not hear any concerns from other trail users about conflicts with horses. Most people are aware of the historic role horses played in the development of the West. To this day, public surveys in Boulder County show a disproportionately high positive response from non-equestrians about the appropriateness of horses on open space in general and about encountering horses on trails in particular. People just like seeing horses "out there."

And, finally, and fortunately, I did not hear any concerns that horses frighten wildlife -- because the preponderance of evidence is that horses are viewed by wildlife as just another form of wildlife. Anecdotally, many equestrians will tell you that the wildlife we observe doesn't startle as quickly or fly as far when we approach them as they do with other human activities. Furthermore, encountering wildlife on a ride is a special experience cherished by many equestrians.

We hope we have convinced you to allow some regional equestrian trails at Rocky Flats.

Based on our experience with other public land management agencies' trail planning processes, we have some more specific suggestions for the trail system at Rocky Flats. Also please

refer to the attached map for our recommended proposed trail system.

- 1) Create a system of stacked loop trails which offer choices and variable-length itineraries.
- 2) Offer meaningful north-south trail connections as well as meaningful east-west connections across the property.
- 3) Move trail alignments in from the site boundaries, to enhance the quality of the user experience and to improve wildlife viewing opportunities. Don't merely run the trails parallel to the perimeter fencing.
- 4) Provide sustainable trails that go where people are going to want to go, and offer reasonable explanations for why people should stay out of certain sensitive areas.
- 5) Utilize a combination of historic roads (to minimize environmental disturbance and to provide a sense of place) as well as new alignments (for variety and to ensure sustainability).
- 6) Make trail connections easy. There appears to be plenty of room, as well as good sight lines, for an access point across Highway 128 from the Coalton Drive Trail (instead of an isolated entry point farther east as your plan currently indicates). We appreciate your proposed connections to Westminster and Broomfield trails, and hope you will be able to connect trails to Arvada and Jefferson County as well (all desirable components of Alternative D).
- 7) Inasmuch as we were unable to schedule a site visit, we can't contribute meaningful input on the nature of the internal trails you have proposed. Those shorter trails might be appropriate for pedestrian-only loops if you feel this segregation is desirable.
- 8) Enlist volunteers to help engender a sense of stewardship in the natural resources at Rocky Flats. Volunteers are ready and willing to help construct, maintain, and manage trails on public lands.

In conclusion, we urge you to look to the Boulder County Horse Association as a resource in your trail planning process. We look forward to a long-term relationship of mutual benefit between the equestrian community and the US Fish & Wildlife Service at Rocky Flats.

Sincerely,

Suzanne Webel
External Vice President
Trails and Open Space Chair
Boulder County Horse Association