



To: City of Boulder Open Space & Mountain Parks

From: Board of Directors, Boulder Mountainbike Alliance

Subject: Comments on Grasslands Management Plan

The Boulder Mountainbike Alliance (BMA) is extremely disappointed by the Grasslands Ecosystem Management Plan (GEMP). While the GEMP provides an excellent resource inventory of our grasslands, it takes the unfortunate step of recommending management actions based solely on maximizing environmental preservation. The GEMP authors seem to have forgotten about the VMP key policy to "Use the least restrictive means possible to reduce visitor conflict and minimize impacts on the environment." This is untenable on two counts:

- 1) Section 176 of the Charter and the Visitor Master Plan (VMP) clearly indicate that Boulder's open space lands serve multiple community values, including both environmental preservation and passive recreation, and
- 2) The GEMP did not survey, discuss, or explore the recreational values of our grasslands, so it has no basis upon which to assess possible synergies between recreation and environmental preservation or to make even-handed trade-offs when necessary.

You can imagine what a "Grasslands *Recreation* Management Plan" would look like if it tried to maximize recreation values without appropriate surveys or consideration of the local ecosystems – there might be recommendations to drastically increase the density of trails, cut through habitat blocks, build trails through ground-nesting bird habitat, put more trails close to riparian areas, and so forth. BMA does not suggest that such an approach is appropriate, but uses it to illustrate the one-sided and deeply flawed attempt to turn the GEMP into a management plan. **Bottom line – the GEMP should be considered a resource inventory to inform management discussions that will occur in the relevant VMP Trail Study Area processes.**

The management recommendations contained in the GEMP would eliminate some of the most sustainable and high-use trails in the Open Space and Mountain Parks (OSMP) system, such as South Boulder Creek and Dry Creek. These trails are not causing any observable environmental problems and, in fact, provide high value to the citizens of Boulder. Furthermore, the GEMP recommendations would eliminate the possibility of creating critical regional connector trails such as the proposed UPRR rail trail from Erie to Boulder, a trail following the old RR grade through the Beech Open Space to create a connector from the City of Boulder to Heil Valley Ranch, and trail segments to connect the East Boulder Trail with the rest of the OSMP system. These opportunities, and any potential tradeoffs between environmental and recreational values, merits a full discussion with the community. This is what the VMP Trail Study Area (TSA) processes were designed to do.

Consequently, the Boulder Mountainbike Alliance suggests the following:

- 1) All management recommendations that involve tradeoffs between Charter purposes should be scrubbed from the GEMP. Management of our open spaces should occur through the VMP TSA processes. The GEMP can still provide important management recommendations for invasive weed control, grassland restoration, and other ecosystem objectives – as long as those recommendations do not involve trading off charter purposes.
- 2) An explicit description should be included within the GEMP that indicates what its purpose is with respect to the VMP. To avoid the appearance of bias, we suggest the GEMP should be defined as a resource inventory and management plan that will inform the TSA processes. It seems appropriate to us given the attempt to restrict recreation in this document, that an explicit statement be included that indicates the primacy of the VMP and TSA processes in determining OSMP management direction.

As always, BMA appreciates the opportunity to comment and participate in these processes that engage the community. We remain an active supporter of OSMP's efforts to make our public lands all they can be. Together, we will create a plan in the meeting rooms and an environment on the land that we all can be proud of.