



BOULDER COUNTY

HORSE ASSOCIATION

The Voice for Horses and Horse People in Boulder County

Oct. 27, 2005

City of Boulder Open Space and Mountain Parks

Attn: Matt Jones

66 S. Cherryvale Rd.

P.O. Box 791

Boulder, CO 80306

**RE: Off-Trail Permits
in HCA's**

The **Boulder County Horse Association (BCHA)** would like to take this opportunity to comment on the Off-Trail Permits for Habitat Conservation Areas, as discussed by the task force that met with staff on this matter earlier in the fall and as outlined in the table entitled "Off Trail in Habitat Conservation Areas Permit Alternatives" presented at the Open House October 25, 2005.

We commend staff on pulling together the different viewpoints into a matrix that makes several alternatives distinctive.

In general we support Alternative 1, as we feel that merely having to obtain a permit to go off-trail in HCA's will be very effective in discouraging the vast majority of such use that may occur today. Furthermore, we believe that it is important to implement a system that is least complicated, least expensive and will result in the highest compliance; these conditions are best met by Alternative 1. Therefore, we urge OSMP to select the least restrictive management approach and only tighten the screws if the restrictions are proven to be insufficient to protect the resource.

We do have some suggestions for the "OSMP Givens" which should be common to all alternatives, thereby streamlining and clarifying parts of the Table. We believe the "Givens" should precede the matrix description of Alternatives:

- 1) Add "No access without Permit' signs will discourage most visitor use of HCAs."
- 2) Add "Permits will be granted equitably to applicants who demonstrate knowledge of low-impact use, OSMP regulations, and HCA issues."
- 3) Add "Permits will contain low-impact rules and other information printed on the back of the permit." [This statement cleans up the Resource Issues column]
- 4) Add "Permits will provide opportunities for OSMP to reach permittees regarding special conditions (e.g. via email bulletins, regarding seasonal closures, mud/snow/ice, etc.)" [Emphasizes education and management control]

- 5) Add "Permits shall be made available upon request electronically, in person or by mail upon applicant's completion of a concise educational program." [This "Given" would clean up the existing "Permit Number" column]
- 6) Add "Permit program shall be monitored annually and made more or less restrictive based on significant measurable impacts, if any." [This statement supports the VMP's Adaptive Management Direction and emphasizes objectivity, rather than "any" or "no" impacts; it cleans up the Permit Number column]
- 7) Replace "To facilitate monitoring..." with "Individual HCA's may be subject to sub-area or seasonal restrictions for resource protection and monitoring purposes." [statement on draft table was confusing]
- 8) Replace "Signing up once for an annual permit..." with "Off-Trail permits for HCA access shall be accompanied by a requirement that permittees report their activity after each visit (including HCA visited, area within HCA visited if relevant, activity, length of stay, conditions, etc.)" [This "Given" would replace an opinion with an objective set of requirements, and would clean up the existing Area/Reporting column]

Within Alternative 1 we submit the following suggestions:

- 1) Permit Number. Eliminate "On-line application" [that item moves to "Givens"]
Add "At start of program, permits will be granted to all applicants.
Adapt down if significant measurable impacts are detected."
- 2) Area/Reporting. Simplify to "Annual system-wide permit." [Anything short of this will be arbitrary, expensive to administer and impossible to enforce]
- 3) Group Size Limit. Eliminate "Limit number of permits for each HCA" [which has nothing to do with Group Size]
Replace 25 with "10 per group leader with permit" [allows some flexibility and discourages large groups]

With these changes in place, BCHA would be pleased to support the Alternative 1 system of Off-Trail permits.

Thank you for your consideration.

Sincerely,

Suzanne Webel

External Vice President, Trails & Public Lands Chair

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