



Parks & Open Space

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BOCC PUBLIC HEARING

Time/Date of Meeting: 1:00 p.m., Tuesday, Dec. 15, 2020

Location: Virtual Meeting

TO: Board of County Commissioners

FROM/PRESENTER: Marni Ratzel, Resource Planner II

AGENDA ITEM: **Update to the Carolyn Holmberg Preserve at Rock Creek Farm Management Plan**

ACTION REQUESTED: Approval

Introduction

Boulder County Parks & Open Space (BCPOS) is requesting the Board of County Commissioners approve and adopt the Carolyn Holmberg Preserve at Rock Creek Farm (CHP/RCF) management plan update. The plan is available at boco.org/CHPplan.

Property Background

The CHP/RCF is a multifaceted open space property. Management involves the wide variety of resource activities that reflect the department's mission *to conserve natural, cultural, and agricultural resources and provide public uses that reflect sound resource management and community values*. Beginning in 1980, BCPOS purchased CHP/RCF to provide an open space buffer between surrounding communities and preserve the property's cultural resources and agriculturally significant lands. The department has continued to successfully manage the property in a manner that supports and integrates the many values that the community depends on for open space: agriculture, wildlife, cultural resources, community shaping, scenic vistas, and recreation to name the most prominent.

CHP/RCF is located along US Highway 287 and Dillon Road and encompasses 1,124 acres. The property is bordered by the City and County of Broomfield, the City of Louisville, and the City of Lafayette. BCPOS leases much of the property to an agricultural operator who raises irrigated and dryland crops, as well as livestock on agricultural lands of national and local significance. Since the early 1980s, the department has leased small portions of the property to the Birds of Prey Foundation rehabilitation center which operates flight cages on the east side of the property and an intensive care unit facility on the west side along 104th Street. There also are currently four operating oil and gas wells on the property.

Like so many places in the northern Front Range, many things have changed in and around CHP/RCF since 2002, when the last management plan update was adopted. Consequently, management of the property has become increasingly complex. After several years of managing through some resource conflicts and a growing internal discussion around needed changes to the property and its management, the department initiated this management plan update process to determine if some overall changes to the property's management can provide some long-term direction to resolve these challenges.

Management Plan Update Process

The plan update process began by reviewing the existing goals and vision for the property. A BCPOS interdisciplinary team confirmed that the goals are to: 1) successfully balance the multiple uses of this property, as identified by staff, stakeholders, and the public; 2) provide staff with a direction and a common vision of what CHP/RCF will look like in the future; and 3) provide management direction to achieve those identified uses and values. Complimenting those goals is the vision statement:

Carolyn Holmberg Preserve at Rock Creek Farm is a working landscape of farming, ranching, irrigation features, and reservoirs, intertwined with critical wildlife, wetland, riparian, and grassland habitats, that preserves its distinct history and provides regional trail connectivity and recreational amenities for current and future generations.

Following the confirmation of the plan goals and vision, the planning process determined the scope of the update and reviewed the current conditions of resources on the property and the status of agricultural and recreational uses of the site. Through an internal staff process along with a public engagement period this spring, the team identified 13 planning issues to focus on and provided new management recommendations in order to resolve each of them. A brief summary of each planning issue, objectives, and recommendations are detailed in Chapter 3, beginning on page 39.

There are several issues that involve an intersection of resources and uses where proposed recommendations involve some degree of management change to ensure the vision and goals of the property may be sustainably achieved. Another set of issues was identified for refinement because of a need to improve stewardship, address aging infrastructure, and adapt to increasing demand for services. All of these proposed management recommendations emphasize the area's multiple resource values and uses, provide for continued agricultural production, protect the most sensitive natural, cultural, and historic resources, allow for appropriate visitor uses, and utilize an adaptive management approach using the most current resource information. Key components of proposed management are highlighted below.

Improving Prairie Dog, Burrowing Owl, and Agricultural Management

Prairie dog management designations will, for the most part, be unchanged, except for the existing 40-acre burrowing owl preserve located in the north part of the property and shown as Field 7 on Attachment A. The designation of the preserve will be changed to support active agricultural operations. This allows for consolidation of active agricultural acreage in the northern portion of the property and lessens the amount of prairie dog control necessary to maintain the existing agricultural areas currently adjacent to the preserve. Emphasizing prairie dogs and grassland restoration in the southern and western part of the property will allow BCPOS to more effectively manage areas where burrowing owls have nested in recent years. Removing cultivated agriculture from this area will create more contiguous acres that are less fragmented by agricultural activities.

Restoring Grassland and Riparian Health

The health and ecosystem function of grasslands will be improved through refined management of prairie dogs and livestock grazing. BCPOS proposes to investigate the efficacy of removing some prairie dogs via trapping in accordance with the BCPOS prairie dog policy to reduce the population density and overall number of prairie dogs to allow the vegetation to reestablish and persist. A respite from livestock grazing for two to five years is

proposed to reestablish native vegetation communities across as much of the grassland as possible. Livestock would be reintroduced using a prescriptive grazing plan in consideration of maintaining a healthy grassland and sustaining prairie dog habitat.

A priority within riparian corridors is preserving wildlife habitat and plant communities. These areas may also provide forage, through managed grazing during certain times of the year, to the extent that riparian habitat health can be maintained. Grazing in riparian areas will be planned and executed to improve and maintain wildlife habitat and native plant communities.

Recreation Management for Wildlife and Visitors

Several species of raptors utilize CHP/RCF for nesting, roosting, and hunting including bald eagles and burrowing owls. Both species are protected by federal and state laws. BCPOS manages recreation on the property to comply with regulations and recommendations by the U.S. Fish and Wildlife Service and Colorado Parks and Wildlife agencies. This includes the seasonal closure of trail segments for nesting activities. Since the property includes a regional trail that provides both transit/multi-modal purposes as well as recreation, the plan update recommends changes and improvements to ensure continuity of the trail system using alternative alignments that meet accepted trail standards.

Cultural and Paleontological Resources

CHP/RCF is a property that is rich in cultural and paleontological resources. At the same time, the property has been used intensively for mining, transportation, and agriculture for 150 years. While BCPOS has preserved and rehabilitated many of the historic structures found on the property, their continued use and maintenance remains an important component of the preserve. Additionally, the property has known prehistoric sites that need protection but has not been either recently or entirely surveyed for both historic and prehistoric sites. The plan update provides recommendations for additional surveys, an analysis of paleontological resource potential, and procedures to protect resources from impacts due to the property's use.

Public Review

On Oct. 19, POS released the draft management plan update with recommendations for refinements to the management of the CHP/RCF open space. The plan and public comment form are posted at boco.org/CHPplan. The draft plan posted for public input is available [here](#). The comment form will remain open until Dec. 15. All comments are published in real time on the webpage.

As of Dec. 7, stakeholders submitted 77 comments using the online form. A majority of stakeholders provided input about prairie dog management. The BOCC may view public comments [here](#). Comments received by Dec. 7 will be incorporated into the staff presentation for BOCC consideration at the meeting on Dec. 15.

Staff hosted a virtual public meeting on Oct. 27 to present an overview of the draft plan update, recommendations, and the public input and approval process. The [presentation slides](#) and [public meeting video](#) are available on the plan web page. A question and answer session followed the presentation. Eighteen community stakeholders participated in the public meeting. Staff answered about two dozen questions, most about prairie dog management. Additional questions answered regarded the agricultural operation, cultural resources,

proposed trail and trailheads, and raptors including bald eagles and burrowing owls. A summary of the Q & A session is provided in Attachment B.

In conformance with an intergovernmental agreement (IGA) between Boulder County and Broomfield, BCPOS staff notified Broomfield about the CHP/RCF plan update. At the request of Broomfield staff, BCPOS provided an informational update to the City and County of Broomfield Open Space and Trails Advisory Committee (OSTAC) at its meeting on Oct. 22, shortly after the plan had been released. OSTAC members sought information about refinement of recommendations relating to wildlife, trails and recreation, and the Birds of Prey Foundation. Initial feedback received from OSTAC members at the meeting expressed support for maintaining the Rock Creek regional trail connection to and through CHP/RCF, and for retaining the Birds of Prey Foundation facility at the site. Some members shared concern for changing the designation of the 40-acre burrowing owl preserve and reducing the acres of prairie dog habitat. OSTAC submitted formal comments to BCPOS on Nov. 5. BCPOS provided responses on Dec. 8. The OSTAC comments and BCPOS responses are provided in Attachment C.

On Nov. 5, staff presented the draft plan as an information item to the Historic Preservation Advisory Board. Staff received input on the historic and cultural resources present on the property and recommendations for refinement. HPAB encouraged the recommendation to fund and conduct a complete cultural survey of the entire property. They also expressed appreciation for the county's awareness and attention to acknowledging the role of indigenous peoples of the land.

POSAC Recommendation

In response to public input received on the draft plan prior to the POSAC meeting, staff outlined proposed changes be incorporated into the CHP/RCF management plan. The primary changes made included clarification about the definition of agriculturally significant lands, change in acres of land designations and uses, additional information on the proposed method to reduce the density and number of prairie dogs, incorporating management actions to strengthen BCPOS relationships and engagement with tribal communities, and to update existing condition information regarding water quality impairment along Rock Creek, provide additional background information about the issues associated with the existing conditions, and incorporate management action recommendations associated with understanding the impairment and engaging with the Keep it Clean Partnership.

POSAC considered a recommendation on the draft plan at its meeting on Nov. 19. Six community stakeholders provided public comment. POSAC passed a motion (4 ayes, 2 nays, 1 abstained) to accept the CHP/RCF plan as presented with modifications to: 1) defer new trailheads to explore off-site parking balance options; 2) balance a sustainable population of prairie dogs, predators, and grasslands. The [Nov. 19 meeting Minutes](#) and [Nov. 19 meeting Video](#) are posted online.

Staff Discussion

Following the POSAC meeting, staff determined that in addition to incorporating the proposed changes presented to the POSAC, further clarification of the prairie dog management, trailhead development recommendation, water quality impairment issues, and standard operating procedures were appropriate. These changes to the final plan are outlined

in greater detail below. With these changes and additions, staff feels that it has addressed POSAC's comments and conditions.

Grassland Restoration

The desire to maintain a sustainable prairie ecosystem that supports not only prairie dogs and their predators but a whole suite of grassland species at CHP/RCF is shared by BCPOS staff, stakeholders, and POSAC members. While the prairie grasslands need relief from continual grazing and usage to retain their health and vigor, prairie dogs are part of the system and there is a strong public desire to maintain them on the landscape. To maintain this ecological relationship is challenging, particularly given that CHP/RCP is much more bounded and fragmented than the natural landscape historically occupied by prairie dog colonies. Urban development surrounds the CHP/RCF open space, limiting prairie dogs in their ability to move across an open landscape and thereby contributing to high populations and densities in the colonies on the property. BCPOS thinks that sustaining a functioning prairie ecosystem is attainable through a more consistent management approach to reduce the density and population of prairie dogs coupled with on-going monitoring and fine-tuning as needed to maintain healthy vegetation communities and the social structure of prairie dog colonies. The department's experience of eliminating prairie dogs to complete grassland restoration has generally been an endless cycle of removal, restoration, reintroduction, and degradation. While the department has been successful at restoring grasslands on degraded properties—for example on open space just to the east of CHP/RCF—the presence of prairie dogs does make the process more challenging and complicated.

BCPOS staff is committed to pursuing an adaptive management approach with annual coordination to assess results and adjust as necessary. As outlined in the plan, the proposed method is a population reduction in both density and numbers of prairie dogs to allow vegetation to recover on the HCA and be established on the MOA areas. At no time will all the prairie dogs be removed from HCA or MOA designated lands, as the goal of this effort is to strike a balance between prairie dog presence, and recovery of the important vegetation components at CHP/RCF.

Staff will develop a formalized methodology based on current research to determine densities of prairie dogs and a desired population size that the grasslands can sustain. As population density reduction efforts commence, continuous monitoring will occur, both to ensure the maintenance of the critical social structure of the prairie dogs, as well as vegetation response to decreased densities. BCPOS will prioritize this consistent effort, and staff will adaptively manage based on results. Staff recognizes this strategy will require significant time commitment and funding and that the effort will be long-term. However, staff deems it worth the investment to determine if this action will lead to a more successful outcome in allowing grassland establishment in combination with maintaining prairie dog populations.

POS anticipates that staff will need about a year to assess the scientific literature and consult with experts to develop a methodology and parameters for actively managing prairie dog populations to allow vegetation to recover on the HCA and be established on the MOA areas.

Recommendation to develop new trailheads

In support of POSAC's recommendation to explore additional off-site parking options, BCPOS will coordinate with our municipal partners at the City of Louisville and City and County of Broomfield to review shared parking lot opportunities in the vicinity of CHP/RCF.

At the same time, our recommendation continues to support developing new trailheads at the end of S. 104th Street and at Brainard Road near the Cradleboard Trail access point.

CHP/RCP is one of the most visited parks in the entire BCPOS system. In 2000, the estimated annual visitation to CHP/RCF was 35,000 visits. Today, this open space sees over 75,000 visits annually by recreationalists who primarily enjoy biking, hiking, and fishing activities. Our 2015 Five Year Visitation study (the most recent one that provides this level of detail) reported that CHP/RCF visitors are likely to be from Broomfield (28 percent), Lafayette (21 percent), or Louisville (15 percent), and it has the second highest percentage of visitors who biked to the property (38 percent). An additional 55 percent arrive by car, which represents a decrease of visitors arriving by car (66 percent) and increase in the percentage of visitors arriving by bike (24 percent) since the 2010 study. The existing Stearns Lake trailhead includes 13 car parking spots, one American Disabilities Act (ADA) van-accessible parking spot, and two informal and unsigned spaces along the west fence of the lot where equestrian visitors park horse trailers. It is common for BCPOS staff to observe as many as 15 cars parked along S. 104th Street and additional vehicles parked at the unimproved area along Brainard Rd. As detailed in the plan, the unique location of CHP/RCF with urban development on three sides and accessed by two local roads that terminate adjacent to the property (Brainard Road and S. 104th Street) exacerbates the need for improved visitor access from each roadway by adding formal parking.

A consideration for developing a new trailhead at the south end of 104th Street is the proximity of its location to nest sites within the active bald eagle territory. BCPOS remains committed to protecting all active nests per USFWS and CPW regulations. The department takes a conservative approach to managing potential disturbance to nesting raptors and will institute mitigation to protect this pair wherever they nest on the property. This mitigation may adhere directly to the Federal and State regulations or may be more conservative based on knowledge of local behaviors of the raptors.

As the bald eagles select a specific nest site, BCPOS will react accordingly. BCPOS will consider the protections of wildlife, as recommended by CPW and USFWS, in relation to recreation, agricultural operations, and regional trails. Protecting nesting raptors from human disturbances that may compromise reproductive success should positively affect outcomes. Therefore, management action to bolster protection of these sensitive wildlife species will always be considered. At the same time, the county recognizes the importance of the transportation functions of regional trails and will endeavor to provide alternate routes and detours that ensure a safe regional trail connection through the property at all times.

Water quality impairment issues

As outlined in the plan, the entirety of Rock Creek from its headwaters to its confluence with Coal Creek in Lafayette is on the state's list of Section 303(d) Clean Water Act waterways as being impaired for selenium and also listed on Colorado's Monitoring and Evaluation List for *E.coli*. Remediation of the impaired waterway requires coordination among landowners and jurisdictional agencies both upstream and downstream. Boulder County can take measures to protect water quality on our property through management actions based on additional sampling and analysis. However, unless the segments upstream of CHP/RCF are remedied and protected from inputs, pollutants will continue to exist in the creek as it passes through our property because management of this single property along the 15-mile reach cannot prevent upstream and downstream impairment. We can work to ensure that BCPOS does not further impair the water quality as it passes through the property. Additional

analysis is needed to identify sources of contamination and recommended mitigation measures. Our recommendations are to conduct sampling and analysis to understand the impairment, compare our results with others taken along the creek, and continue to engage with Keep it Clean Partnership.

Standard Operating Procedures

Individual POSAC members expressed concern about the health of riparian areas due to the impacts of livestock access where gates and fences need management and maintenance. In response, BCPOS has incorporated a new management action to develop standard operating procedures to outline responsibilities and protocols for managing access gates/fences restricting use of riparian areas.

BOCC Action Requested

Approve and adopt the Carolyn Holmberg Preserve at Rock Creek Farm management plan update, as presented.

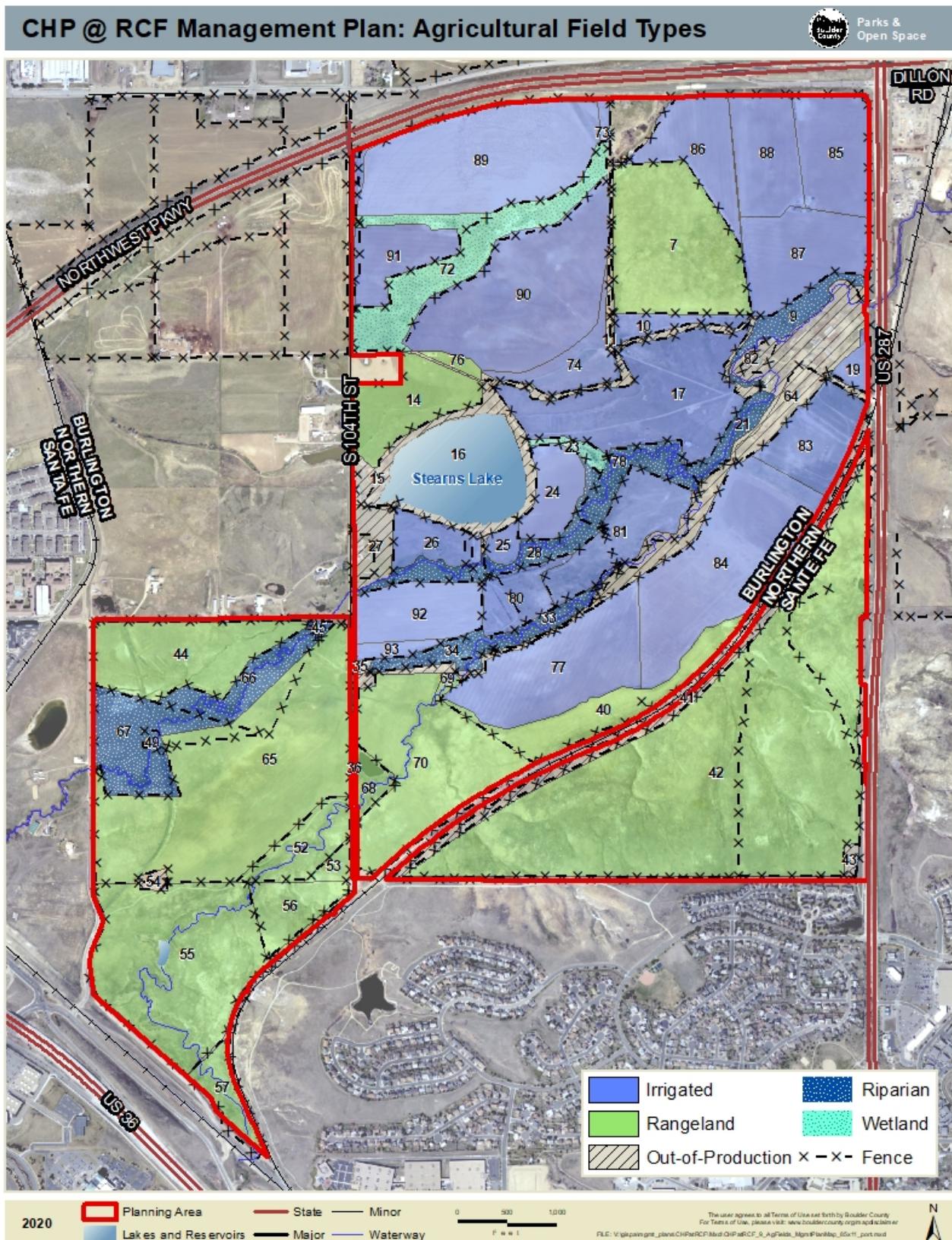
Attachments

Attachment A: Agricultural Field ID map

Attachment B: Oct. 27 Public Meeting Questions & Answers

Attachment C: City and County of Broomfield OSTAC Comments and responses

Carolyn Holmberg Preserve at Rock Creek Farm Management Plan 2020 Update



**CHP/RCF draft Management Plan Update
Nov. 27 Public Meeting
Questions & Answers**

Public Questions:

- 1. What are the crops being grown especially around field 7? Are any of these areas surrounding field 7 and just overall, organic regenerative cultivation operations? - Jeremy Gregory**
 - Answer: Surrounding fields to #7 are corn and pumpkins. We can ask our Ag staff for more details on the overall operation. - Jeff Moline
 - Answer: Jeff is correct that two important crops are corn and pumpkins. The tenants also raise wheat, barley, and alfalfa and grass for hay. Crops are rotated and the same crop is generally not grown in consecutive years. The tenants have considered organic production but have not initiated organic production. They are currently in the process of transitioning away from GMO corn. - Rob Alexander
 - Answer: Cropland surrounds field 7 on all sides. All the crops raised on the farm are rotated among those fields. In addition to the primary crops mentioned, the tenants have raised triticale, white wheat and forage sorghum. So, over the years, the fields around field 7 have seen all of the crops raised on the farm. - Rob Alexander
- 2. When you say trapping prairie dogs, does this mean trapping to relocate or to kill?**
 - Answer: The department's management of prairie dog's system-wide includes trapping to relocate and trapping for donation to raptor and ferret programs. The trapping at Field 7 would be a relocation. Our overall prairie dog management program does include lethal control as well. Our Prairie Dog management staff can provide more information. - Jeff Moline
- 3. How many prairie dogs are currently in field 7? When was the last prairie dog count done by county wildlife biologists? - Ruby Bowman**
 - Answer: Counts have not been completed but will be - Amy Schwartz
- 4. In the slide on historic resources, there was a bullet, "Several Isolated Finds." Can you give some examples? - Trace Baker**
 - Answer: Isolated finds are usually small cultural resource items that are not associated with a recognized site. For example, a stone tool. - Jeff Moline
- 5. Are these finds always prehistoric, or can they be more recent? - Trace Baker**
 - Answer: They can be more recent. - Jeff Moline/Marni Ratzel
- 6. The proposed trailhead and parking lot at the end of 104th street is within ¼ mile of an active bald eagle nest, and even if the eagles choose not to nest there going forward, it will remain an active nest by CPW's definition for the next five years. How do you plan to follow CPW recommendations in pursuing this project, given that CPW's 2020 raptor guidelines recommend against new surface occupancy within ¼ mile of an active nest? - Theo Kuhn**
 - Answer: Consult with CPW on the location of the proposed trailhead parking lot. - Therese Glowacki/Marni Ratzel
- 7. In the Critical Wildlife Habitats Map where prairie dogs are occupying that area, why aren't these designated as HCAs? - Pamela Wanek**
 - Answer: Criteria is used to designate prairie dog habitat as HCA. The MOA fields do not meet criteria to designate as an HCA. The current designated HCA up on the hillside is native grassland. The boundaries don't border cropland.

8. **How would thinning occur without damaging social structure?** I have 25 years of field experience with prairie dogs and thinning is not proven to be effective, in fact, it could exacerbate the problem. Could we potentially look more into restricting expansion, prairie dogs can regulate populations via less successful births etc... within stabilized areas. - Pamela Wanek
 - Answer: Thinning is disruptive to the social structure of colonies. No area to restrict expansion and the other areas on the property are already occupied by prairie dogs. - Therese Glowacki
9. **Has expanding the current parking lot been considered instead of putting in an additional lot to the south?** Unrelated: I am also curious --not in relation to the plan--about the juvenile bald eagle I've seen there recently. Is it related to the adult pair? - Tamar Krantz
 - Answer: Tamar - The team has considered expansion of the existing parking lot, but due to its proximity to Stearns Lake and a very high-water table, we do not think that we will be able to expand in the current footprint. Consequently, we felt that a smaller parking area at the end of 104th could help with the need for additional parking. - Bevin Carithers
10. **I have spoken to quite a few stakeholders and the consensus is that there needs to be additional time for public comment.** Many Boulder County residents have been displaced by wildfires and are therefore unable to participate in the entirely virtual stakeholder feedback process. Across Colorado, COVID-19 cases are at their highest levels yet and continuing to rise. And the upcoming election on November 3rd—squarely in the middle of this timetable—is occupying the civic energy of many Coloradans. Aspects of the plan need to be accounted for by CORA requests.
How can you justify the time frame? - Dana Bove
 - Answer: Public has 3 weeks to review the plan. Public should be able to meet these guidelines. - Jeff Moline
11. **If you remove prairie dogs from field 7, and relocate prairie dogs out of Holmberg, and thin in field 68, how can you be sure enough prey for hawks and eagles.** - Donna Busching
 - Answer: Removal of 40-acre preserve would not take out 'much' of the prairie dog habitat in the total acreage (occupied by prairie dogs) of the property. - Amy Schwartz/Therese Glowacki
12. I have one more question...**Has Boulder County seen Kiss the Ground? It's a movie about regenerative farming.** - Pamela Wanek
 - Answer: Not yet. - Rob Alexander
13. Follow-up to Donna's question: The management plan asserts that there is "ample" prey for nesting bald eagles. Given that the draft plan recommends reducing prairie dog populations in almost all of the property's prairie dog colonies--including in MOAs and HCAs-- and given there is no upper limit in the Prairie Dog Policy on the amount of prairie dogs that can be removed, **how can BCPOS assure that there will still be "ample" prey for the nesting eagles under the new plan?** - Theo Kuhn
 - Answer: Staff will be addressing these concerns moving forward. 40-acre preserve is first on the list. Several prairie dog colonies exist in the surrounding areas. - Amy Schwartz
14. **Something to consider is raising the standards of ag cultivating.** - Jeremy Gregory
 - Answer: BCPOS is taking measures to do that via the Mad Agriculture program/carbon farming research project which would change ag. practices and increase carbon/water sequestration - Therese Glowacki/Jeff Moline
15. **The proposed RR grade trail will also be in close proximity to burrowing owl nests and is in the middle of an area where the nesting eagles often hunt. How does this make sense?** - Dana Bove

- Answer: Cradleboard is currently subject to closures via the burrowing owls. Green line offers flexibility when closures occur, while maintaining trail connectivity. Orange line is a potential option to do the same. - Therese Glowacki/Marni Ratzel
- 16. **Does BCPOS plan to afford spatial protections for juvenile and adult eagles during the post-fledge dependence period that can last 6-8 weeks post fledge?** - Dana Bove
 - Answer: CPW changed guidelines, but BCPOS is respecting these guidelines Oct. 15-end of July. - Therese Glowacki
- 17. **But MOAS allow removal of up to 99 percent of prairie dogs, and there will be no HCA for prairie dogs.** - Donna Busching
 - Answer: HCAs will remain on the property. Removing 99% of prairie dogs has only occurred rarely on BCPOS properties and is not being recommended in the management plan. - Jeff Moline/Marni Ratzel/Amy Schwartz
- 18. **The nose of the RR grade trail could be within 250 meters of where burrowing owls recently nested.** - Dana Bove
 - Answer: Take a look at for sure. - Jeff Moline
- 19. **When the county does restoration of field 65, will prairie dogs be removed by lethal control from this field.** - Ruby Bowman
 - Answer: Do not have to remove prairie dogs on this existing field. - Therese Glowacki
- 20. **Why not put an upper limit on removal on MOA's at Holmberg, at a minimum?** - Dana Bove
 - Answer: Have not ever considered, but not opposed to in the future. - Therese Glowacki
- 21. **Hard to tell the difference in color of HCA and MOA on map.** - Donna Busching
 - Answer: Thank you for this comment. We will consider refining the colors to better distinguish the two colors. - Marni Ratzel
- 22. Therese, then if the removal on MOA's has always been low, then **how can you use past nest productivity records to justify prairie dog removal on MOA at Holmberg that has no limits?** - Dana Bove
 - Answer: Prairie dogs will not be completely removed on MOAs at CHP/RCF and has not been considered. - Therese Glowacki
- 23. **I was curious about the juvenile bald eagle. It is not related to the plan, but is it related to the adults?** - Tamar Kantz
 - Answer: We could put you in touch with our wildlife specialist to discuss your question. - Therese Glowacki/Jeff Moline
- 24. **I do have a question about the current nest, more of comment. Can we discuss now?** - Dana Bove
 - Answer: We could put you in touch with our wildlife specialist to discuss your question. - Therese Glowacki/Jeff Moline

CHP/RCP Management Plan Update • Responses to the Broomfield OSTAC and staff comments
12/8/2020

The Broomfield Open Space and Trails Advisory Committee (OSTAC) and Open Space and Trails staff commend Boulder County for their work on the thorough, in-depth DRAFT Carolyn Holmberg Preserve At Rock Creek Farm Draft Management Plan (DRAFT). We appreciate the extensive steps to provide outreach to Broomfield residents to make sure that our community is aware of this planning effort. Thank you also for attending our October OSTAC meeting to provide an overview of the DRAFT.

We appreciate your consideration of the following comments. We wish you the best with this management plan. Below are OSTAC's comments. [BCPOS responses are provided in blue.](#)

INTRODUCTION: DESCRIPTION OF PLANNING AREA

Page 7: The Carolyn Holmberg Preserve abuts CCOB property to the north too. Please note this in the first paragraph as it relates to a later comment about the proposed trail in this area.

[The plan has been amended to incorporate this comment.](#)

INTRODUCTION: COLLABORATION

Page 11: Please note the meeting with OSTAC as we appreciated the Boulder County staff attending our meeting. It would also be nice to note the extensive notification that Boulder County completed to make sure Broomfield residents were informed about the project.

[The plan has been amended to incorporate this comment.](#)

SOIL AND WATER RESOURCES

Page 16: It would be interesting to know a little more about what this sentence specifically means. "The BCCP designates much of the property as *nationally or locally important agricultural land*, a recognition of both suitable soils and adequate irrigation water."

[The Plan has been amended to include definitions and criteria established by the U.S. Department of Agriculture \(USDA\) to identify the extent and location of important farmlands that can be used for production of the nation's food supply.](#)

Page 18: Parrots Beak Pond: It is unfortunate to hear about all the trash in this drainage. Perhaps a joint Broomfield and Boulder County open space clean-up would be a good event once we can gather together again. Could this be listed as a recommendation for the Buffalo Gulch recommendations?

[The plan has been amended to incorporate management actions to collaborate with City and County of Broomfield on clean-up events to remove trash from ponds and drainage area](#)

DESIGNATION AND USE OF 40-ARE BURROWING OWL PRESERVE AND FIELD 65

Page 41-42: Please make it more clear in the plan if the Field 7 acres are being replaced by Field 65 that can allow for prairie dogs.

[The plan has been amended to include tables that display existing and proposed acres of prairie dog management designations \(Habitat Conservation Areas \(HCA\), Multiple Objective Areas \(MOA\), and No Prairie Dog Areas \(NPD\), and lands under agricultural management. Additionally, the current management of field 65 has been clarified. The 2002 plan delineated approximately 35 acres MOA designated land west of 104th Street as dryland cropland. These acres comprise a portion of what is identified today as field 65. The recent](#)

**CHP/RCP Management Plan Update • Responses to the Broomfield OSTAC and staff comments
12/8/2020**

management intent has been to cultivate these fields with a cover crop to manage weeds and prepare the soil for reseeding as grassland. Over the years, the area cultivated for cover crop has expanded to approximately 63 acres. At the same time, the number and density of prairie dogs on these fields has increased. On-going prairie dog control has been minimal as POS prairie dog management has been focused on NPD designated lands.

Could Field 65 be an area that is designated for prairie dogs without other agricultural uses such as grazing so that the loss of Field 7 is compensated for in respect to prairie dog habitat?

The BCPOS interdisciplinary team identified a range of options to explore in considering how to address grassland conditions, from continuing the status quo for livestock grazing to considering cessation of livestock grazing. The primary goal for Field 65 is grassland recovery and restoration.

Page 41: If Field 7 is returned to a dryland crop field, the expense of undergrounding the utility line is avoided to allow for a pivot sprinkler. Please explain if this is a viable alternative plan for the site.

Although it may remain rangeland in the short term, it most likely would ultimately be transferred to irrigated cropland (it was non-irrigated dryland cropland before). There is the potential to relocate a future center pivot sprinkler. This is the most efficient and effective irrigation method.

GRASSLAND RESTORATION

Page 43-45 Grassland Restoration (note this comment also relates to the sections on DESIGNATION AND USE OF 40-ACRE BURROWING OWL PRESERVE AND FIELD 65 and PRAIRIE DOGS):

Please clarify the existing acres where prairie dogs are allowed and the future acres designated for prairie dogs. The plan could benefit from this clarification as it is not clear if overall acres are proposed to be reduced. A map showing existing and proposed areas would be helpful. Please also confirm the existing and proposed acres of land devoted to farming and/or grazing.

The plan has been amended to include tables that display existing and proposed acres of prairie dog management designations (Habitat Conservation Areas (HCA), Multiple Objective Areas (MOA), and No Prairie Dog Areas (NPD), and lands under agricultural management, as detailed below.

| Prairie Dog Designation | Existing Acres | | Proposed Acres | |
|-------------------------|----------------|------|----------------|------|
| HCA | 159 | 14% | 159 | 14% |
| MOA | 375 | 33% | 335 | 30% |
| NPD | 588 | 52% | 628 | 56% |
| Total | 1122 | 100% | 1122 | 100% |

| Agricultural Use | Existing Acres | | Proposed Acres | |
|-------------------|----------------|------|----------------|------|
| | | | | |
| Irrigated | 415 | 37% | 455 | 41% |
| Dryland cropland | 63 | 6% | 0 | 0% |
| Out of production | 111 | 10% | 111 | 10% |
| Rangeland | 428 | 44% | 451 | 40% |
| Riparian | 72 | 6% | 72 | 6% |
| Wetland | 29 | 3% | 29 | 3% |
| | 1118 | 100% | 1118 | 100% |

OSTAC would like to see design alternatives that would avoid removing the existing prairie dog colony in Field 7. Relocation of that colony would cause inevitable loss, and we would like to see an analysis of how some neighboring fields perhaps to the north and east could be moved out of cultivation, allowing a more natural spread of the existing colony. Reducing the amount of cultivated land will reduce pressure on the irrigation systems and would make improvements more efficient by reducing the targeted area. We would also like to understand how prairie dog management is currently being conducted with respect to time and costs. Relocation of Field 7's 40 acres of prairie dog habitat into another suitable area of the Preserve is also an option that could be considered to compensate for the loss of Field 7. In summary, OSTAC would like to see a plan that scales farming acres back somewhat to preserve and restore more of the natural ecosystem to benefit the future. This plan, at a minimum, should maintain the number of acres currently allowed for prairie dogs and burrowing owl habitat.

The current 40-acre preserve occupies agricultural land designated as significant agricultural land of national importance. Consolidation of agricultural acreage and emphasizing prairie dogs and grassland restoration in the southern and western part of the property will allow BCPOS to effectively manage areas suitable for burrowing owl nesting. These contiguous acres provide areas relatively undisturbed by recreational or agricultural activities.

Page 45: It appears that bullet #4. at the bottom of the page is missing a word -- we would suggest adding the word 'and' before 'prairie dog management'. Also, would it be possible to allow for restored grasslands without allowing for future grazing? Instead, this land could perhaps be designated for prairie dog habitat.

The plan has been edited.

Pages 43-45: Is there more detail on how action items that note 'reducing prairie dog populations' and 'keeping prairie dog densities low' are being achieved? Questions on this topic could be expected as to how a targeted density is determined and how reductions in density are being carried out.

The plan has been amended to include additional information about the BCPOS staff commitment to pursuing an adaptive management approach with annual coordination to assess results and adjust as necessary. As outlined in the plan, the proposed method is a population reduction in both density and numbers of prairie dogs to allow vegetation to recover on the HCA and be established on the MOA areas. At no time will all the prairie dogs be removed from HCA or MOA designated lands, as the goal of this effort is to strike a balance between prairie dog presence, and recovery of the important vegetation components at CHP/RCP.

Staff will develop a formalized methodology based on current research to determine densities of prairie dogs

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and a desired population size that the grasslands can sustain. As population density reduction efforts commence, continuous monitoring will occur, both to ensure the maintenance of the critical social structure of the prairie dogs, as well as vegetation response to decreased densities. BCPOS will prioritize this consistent effort, and staff will adaptively manage based on results. Staff recognizes this strategy will require significant time commitment and funding and that the effort will be long-term. However, staff deems it worth the investment to determine if this action will lead to a more successful outcome in allowing grassland establishment in combination with maintaining prairie dog populations.

POS anticipates that staff will need about a year to assess the scientific literature and consult with experts to develop a methodology and parameters for actively managing prairie dog populations to allow vegetation to recover on the HCA and be established on the MOA areas.

Page 30: What is the designation for the lands that are just west of 104th Street and south of the Northwest Parkway?

These lands are beyond the planning boundary of the CHP/RCP management plan update. That property is Trillium Open Space, managed by the county per the Jointly Owned Lafayette Louisville Management Plan.

PRAIRIE DOG MANAGEMENT

Page 46: At the southwest corner of Lac Amora along Fields 53, 55, 56, and 57, please allow for consideration of the use of barriers to minimize expansion into the residential area to the east. Currently, prairie dogs have migrated into the Lac Amora area from the Preserve. The goal is to minimize future prairie dog management in this area and reduce conflicts with residents. Barriers are a helpful tool to have in the management toolbox. Please provide a chart that shows the location and acres of where prairie dogs currently live now and where they will be allowed to be in the proposed management plan. A map showing pre- and proposed plan areas for prairie dogs would be helpful. It would be positive if the same number of prairie dog habitat acres are preserved in the new plan as currently exist. However, we would like to understand the acreage numbers more to see if this is a feasible request.

A summary of existing and proposed acreage of prairie dogs land designations is included above (as part of response to a previous comment). The plan includes a map of prairie dog land designations and 2020 colonies. BCPOS is interested in collaborating with City and County of Broomfield and BCPOS on management of prairie dogs on public lands as part of our current routine activities.

Page 46: Raptor poles could be added to areas where prairie dog populations are more dense to alleviate population pressures, while also supporting raptors' needs for prey.

BCPOS seriously considered installing an artificial nest as a possibility but does not intend to pursue this action. Raptor use of artificial nest structures is not guaranteed, and installation is costly and potentially dangerous. At CHP/RCF, there are additional large cottonwood trees on the property that can, and could in the future, serve as nesting trees. Additionally, with our planned current and long-term mitigation strategies to limit disturbance to bald eagle nesting locations at CHP/RCF, we believe that the installation of an alternate nest platform is unnecessary.

Page 46: At the top of the page, under objectives, could the 2nd bullet be revised to state, "Minimize potential

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for prairie dog encroachment onto adjacent private or public lands that are not HCA areas”?

BCPOS is interested in collaborating with City and County of Broomfield on management of prairie dogs on public lands as part of our current routine activities.

WILDLIFE CLOSURES OF THE REGIONAL TRAIL

Page 50: Please note in the recommendation for the Cradleboard Trail from 104th St. West to Brainerd Drive (Green Trail) that the proposed trail will be offset from the property line by at least 75 feet and a prairie dog barrier is needed along the northern property fence line to minimize migration into the residential/agricultural properties to the north. This buffer area should be a NPD zone to avoid conflicts with the residential/agricultural properties.

As outlined in the plan, BCPOS will install barriers to prairie dog dispersal along the field 44 northern boundary west of South 104th Street, in conjunction with the recommended development of a trail between Brainard Road and South 104th Street. The proposed trail alignment proposed in the plan is conceptual. If approved, a management action would be to complete a preliminary and final design before construction.

Page 50: OSTAC is interested in understanding the floodway's potential impacts on the Green Trail and proposed trailhead just west of 104th. The proposed trailhead should be located out of the floodway if at all possible. (Comment is also listed under RECREATION below).

The proposed trail alignment proposed in the plan is conceptual. If approved, a management action would be to complete a preliminary and final design before construction. This would include an assessment of the regulatory floodway impacts.

Page 50: The orange proposed trail is a useful and positive option pending the analysis of environmental impacts.

Page 50: Please show the proposed trail in Recommendation 2 for the Cradleboard trail east of 104th so the proposal is more understandable. It is unclear where this alternative trail will be located without a map.

The plan has been amended to present a map showing the full extent of the CHP/RCF planning boundary and detailing existing and proposed trail alignments.

Page 50: Please provide a proposed trail map that shows the entire trail system for the property with the proposed trailheads, trails, etc.

The plan has been amended to present a map showing the full extent of the CHP/RCF planning boundary and detailing existing and proposed trail alignments.

RECREATION, VISITOR ACCESS, AND ACCESSIBILITY

Page 53: Please note that the final Brainerd trailhead location will be determined by Boulder County staff collaborating with Broomfield’s Transportation Engineering Division, Open Space and Trails Department and adjacent residents.

The proposed trailhead location in the plan is conceptual. If approved, a management action would be to complete a design in coordination with the City and County of Broomfield.

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Page 53: OSTAC is interested in understanding the floodway's potential impacts on the proposed trailhead just west of 104th. The proposed trailhead should be located out of the floodway if at all possible.

The proposed trail alignment proposed in the plan is conceptual. If approved, a management action would be to complete a preliminary and final design before construction. This would include an assessment of the regulatory floodway impacts.

CULTURAL AND PALEONTOLOGICAL RESOURCES

Page 55: Please consider adding informational signage at the Preserve that acknowledges the native and indigenous people who once lived in this area. The acknowledgement in the Draft report is appreciated.

BCPOS will consider the addition of informational signage.

AGRICULTURAL OPERATIONS USE OF HISTORIC BUILDINGS AND STRUCTURES

Page 56: Please show a map of the historical structures and the proposed location in the north central area of the property for some of the agricultural operations.

The cultural resources map included in the plan depicts an icon for historical structures. The proposed location for some agricultural operations is conceptual. It is anticipated that a site may be identified on the current residential parcel occupied by the agricultural tenant. If approved, a management action would be to complete a design.

BUFFALO GULCH

Page 58: Please add a recommendation about clean-up of the ponds and drainage area. Earlier in the document, the amount of trash is noted as a concern. This could be a nice opportunity for a joint clean-up project between Broomfield and Boulder County.

The plan has been amended to incorporate a management actions to collaborate with City and County of Broomfield on clean-up event to remove trash from ponds and drainage area

BIRDS OF PREY FOUNDATION OPERATIONS

Page 60: The Plan's recommendation to continue Boulder County's partnership and collaboration with the Birds of Prey is strongly supported. The recommendation to continue this work with the Birds of Prey is appreciated. Thank you for making it a priority to make sure this important non-profit has a home. It would be helpful to provide a map showing the relocation site area for the facilities. We commend Boulder County for seeking a new site that will protect the riparian zone and floodplain while providing a location for BOP facilities/operations.

The Birds of Prey foundation have not yet submitted their land use review application.

PLAN PRIORITIES

It is recommended that the Prairie Dog Management Recommendations 2, 3 and 4 related to barriers and the MOA/HCA be given high priority designations.

The plan has been amended to incorporate this comment.