

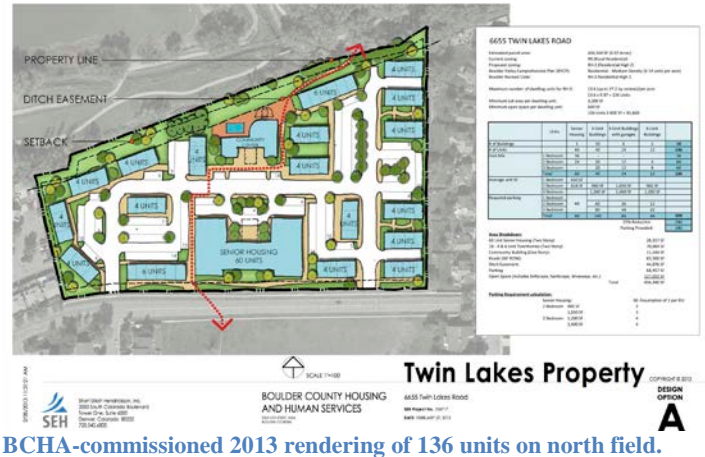
An MDR land use change would harm environmental quality

Policy 1.18 of the Boulder Valley Comprehensive Plan states that new development must “maintain or improve environmental quality as a precondition for further housing and community growth.” BVCP Natural Environment policies require the protection of habitat connections, wetlands, and Boulder County Wildlife Species of Special Concern. The proposed land-use change of Medium Density Residential for the Twin Lakes parcels would violate all of these policies, and the environmental damage would be impossible to mitigate.

MDR development would allow 280 units and require 656 parking lots. This would pave over the vast majority of the grassland. Environmental consequences would include:

1) Destruction of the last remaining wildlife corridor between the Twin Lakes to the north and the Johnson/Coen Trust and Walden Ponds to the south.

According to the report “Best Management Practices for Wildlife Corridors” (Beier et al., 2008), the Center for Biological Diversity and a wealth of other research, the minimum width for wildlife corridors should be about 1,000 feet wide for most of its length. This is about the current width of the Twin Lakes corridor. BCHA’s proposal to maintain an 80-foot-wide corridor is unscientific and inadequate.



BCHA-commissioned 2013 rendering of 136 units on north field.

Impacts of corridor loss:

- Reduced movement and viability of animal populations, and ecosystem imbalance
- Increased vulnerability to environmental disturbances and lower resiliency
- Increased human-wildlife interactions and safety risks to people, pets, and wildlife

2) Destruction of habitat for Species of Special Concern and other wildlife

Six Boulder County Wildlife Species of Special Concern live directly on the fields: Tiger salamanders, meadow voles, garter snakes, belted kingfisher, northern flicker, and wood ducks. Eighteen other Species of Special Concern have been documented using the fields for foraging, such as northern harriers, bushtits, pine siskins, prairie falcons, and a variety of other birds. An MDR land-use change would remove this habitat. Other wildlife, such as ground-nesting birds protected by the Migratory Bird Treaty Act, would also lose habitat. This summer, BCHA’s own hired biologist found a mallard’s nest and meadowlark’s nest with five babies in the fields.



Coyote on north field

3) Light and noise pollution on adjacent, undestroyed open space

Dark-sky lighting, as BCHA proposes, helps astronomers but not wildlife. Impacts:

- “Grasslands are also open habitats with few barriers to block lights. Research shows influence of lighting on nesting behavior of birds, distribution of predators, and signaling by bioluminescent organisms such as fireflies.” (Longcore, 2016)
- Artificial lighting impairs the ability of nocturnal animals to navigate corridors (Beier 2006) and has been linked to declining reptile populations (Perry and Fisher 2006).
- Noise can disturb or repel some animals and impede movement (Minton 1968, Liddle 1997).
- Light and noise pollution especially affect “linear vegetated corridors like ditches.” (Keeley, OSMP)



BCHA’s 70-unit Josephine Commons, showing large area required for parking.

4) Number of annual visits to the Twin Lakes Open Space would nearly double

The Twin Lakes Open Space is the most heavily used open space property in the County. In 2012, it received more than 103,000 user visits a year. MDR would add about 700 people. If just one-third of them were to use the Twin Lakes each day, that would equate to 85,000 additional user visits annually—an 183% increase. This would significantly stress an already strained environment. At least four other Wildlife Species of Special Concern use the adjacent Twin Lakes (for a total of 28 in the living at or using the area). They would be affected by spillover impacts of overuse in this interconnected ecosystem.

Cross-jurisdictional impacts: Loss of habitat connections, destruction of Significant Habitat (as defined by Article 7 of Boulder County’s Land Use Code) for Species of Special Concern, unmitigable harm to environmental quality, and a significant loss of wildlife beloved by Gunbarrel residents. (See Wetlands paper for impacts to wetlands.)