



March 10, 2022

Rosi Dennett  
Front Range Land Solutions  
210 Lincoln Street  
Longmont, CO 80501

RE: Planet Bluegrass Proposed Camping Area  
Wetlands Protection and Integrated Weed Management

Dear Rosi,

Per your request we visited the Planet Bluegrass South Grazing Area located between Apple Valley Road and North St. Vrain Creek to review existing site conditions. It is our understanding that Planet Bluegrass has requested a Conditional Use approval from the Town of Lyons which would permit camping in the area during two festivals, totaling 12 days of the year. It is our understanding that the Ecology Advisory Board has expressed concerns about the area just north of Apple Valley Road which has been identified as a wetland in the Boulder County Comprehensive Plan.

Our review of the project area did identify a low area near the road that supports wetland vegetation. Birch Ecology will perform a formal Wetland Delineation of this area in accordance with the U.S. Army Corps of Engineers 1987 manual and the Great Plains Regional Supplement. We will flag the limits of the wetland based on vegetation, soil, and wetland hydrology indicators. This will allow you to install temporary fencing to protect the wetlands during the 12 days of camping. We recommend that you establish a minimum five-foot buffer between the limits of the wetland and the temporary fencing. The fencing should be marked with signage which indicates that this is a sensitive wetland area and telling visitors to keep out. Our delineation will encompass the entire South Grazing Area, so we will show an absence of wetlands in the area where campers would set up.

As you know, this area was heavily impacted by the 2013 flood which has affected the plant community, allowing weedy and non-native plants to become established. To preserve and enhance the riparian habitat and wetlands, we will assist Planet Bluegrass by providing recommendations for Integrated Weed Management in the South Grazing Area. The Colorado Natural Areas Program describes Integrated Weed Management as "a process by which one selects and applies a combination of management techniques (biological, chemical, mechanical, and cultural) that, together, will control a particular weed species or infestation efficiently and effectively, with minimal adverse impacts to non-target organisms." Rather than focusing simply on the symptoms of the weed infestation, Integrated Weed Management differs from traditional weed management in that it uses an ecological approach to address the ultimate



causes of weed infestation and considers the biological and ecological characteristics of individual weeds to determine effective means of control. One important objective of Integrated Weed Management is to use a combination of techniques to reduce the need for chemical herbicides over the long-term.

Through wetland protection and integrated weed management, the functions and values of the riparian habitat and wetlands can be preserved while it is used on a temporary basis for camping. We will complete the wetland delineation in spring or early summer to allow you to plan the locations of temporary fencing and designated camping areas prior to the bluegrass festival in late July.

Please call if you have questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Heather Houston", is written over a faint, illegible printed name.

Heather Houston  
President & Senior Ecologist