



December 10, 2021

Recreational Trails Program
Colorado Parks and Wildlife

Re: Non-motorized Construction Grant Application: Electric Hills Trail System

Thank you for the opportunity to comment on the 2021-2022 non-motorized trails grants. I am submitting comments on behalf of the Great Old Broads for Wilderness (Broads), Northern San Juan Chapter.

We appreciate the collaboration and local support that the project shows. We did notice there was not a letter of support from the Montrose High School Mountain Bike Team. The application does mention the support of the club through volunteer trail building. We understand it can be difficult to get all letters support before the application deadline, but we would ask that support from this organization be provided.

We appreciate COPMOBA mentions of working with BLM and CPW to clarify the project meeting the updated Dry Creek Travel Management plan. **We would like to see a determination/opinion from CPW about winter closure dates for the Electric Hills area.** We understand that the Environmental Assessment (EA) and subsequent Decision Record: Montrose County Shavano Gateway Recreation Area Amendment, which amended the 2008 Dry Creek Travel Management Plan determined winter closure to be December 1 through April 15. (We also note that the Decision Record was signed by BLM on October 15, 2021, after the grant application deadline.) However, CPW winter closure dates are generally December 1 through April 30. This is evidenced by the following:

- The *Colorado's Guide to Planning Trails with Wildlife in Mind* from Colorado Parks and Wildlife (CPW June, 2021), states, "For trails within elk and/or mule deer winter range, implement seasonal timing restrictions for all trail users from December 1 through April 30." This document was prepared by CPW, with contributing task force members from BLM (two members) and other federal, state and local land management agencies. Appendix D states, "The Task Force members reached unanimous consensus and enthusiastic support for the document." (https://cpw.state.co.us/Documents/Trails/Appendix_D_Planning_Trails_with_Wildlife_in_Mind.pdf) We understand that CPW may set exact winter closure dates according to local conditions in order to protect wildlife.
- As an example, on December 31, 2020, CPW put out a news release on winter closures from December 1 through April 30 for the Billy Creek State Wildlife Area. The release included some compelling statements about the stress on winter populations of elk and mule deer due to all types of recreational use during winter closure. <https://cpw.state.co.us/aboutus/Pages/News-Release-Details.aspx?NewsID=7685>) Billy Creek is located in the same region as Electric Hills and could be a model for local winter travel closures to protect wildlife.

Broads appreciated the application including budget for winter closure equipment - 3 wildlife seasonal closure gates/fences, 20 trail limiters, and trail signs (hopefully including trail closure signs as depicted on Page 27 of the application). We ask for clarity on the statement "In the future, BLM and COPMOBA will undertake further actions to implement the closure, including vehicle gates at the trailhead. Appropriate signage at gates and the trailhead will inform the public of the closures and the rationale for the closures." We would like to see that the installation of the gate, signs and the limiters to exclude motorized traffic

from the trails will be completed during the grant time period. We encourage CPW to ensure that this part of the budget, and the time and effort to place those structures, be included in any grant approval.

The following two comments are general comments on the non-motorized grant process.

We appreciate the work that COPMOBA does to build and maintain trails, and we know they have a great network of volunteers. However, we remain concerned that the CPW grant process does not allow for planned maintenance of all constructed trails.

We remain concerned about statement that trails are labeled as multiuse when there are often not adequate provisions to make them truly friendly for hiking, equestrian and mountain biking. A 18 - 24-inch wide trail does not leave much room for simultaneous bicycle and human use on a busy trail. The document *Guidelines for a Quality Trail Experience* has a nice list of Trail User Objectives. Hikers, bird watchers and equestrians may focus on the values of nature, solitude, escape, socializing and safety/security (including on-trail security). Mountain bikers may focus more on risk, challenge, variety (surface, grade), and playfulness. Trail design to accommodate all those objectives is difficult. The above referenced document goes on to explain Preferred Use, “While preferred-use trails allow two or more user types to access a trail, they are designed to primarily accommodate the experience of only one of the users. Used as a management tool, preferred-use can combine the benefits of both multi use and single-use trails, but due to user reference of the design elements they may become de facto single-use trails.” (BLM and International Mountain Bicycling Association. 2017. Guidelines for a Quality Trail Experience. <https://www.imba.com/resource/guidelines-quality-trail-experience-gqte>) CPW trails program needs to consider this in their planning and inventory of trails for various user categories.

Respectfully,

[signed electronically]

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