



November 25, 2020

Dear State Trails Committee, subcommittee members, and Mr. Jacobs,

I write today on behalf of our Northern San Juan chapter of Great Old Broads for Wilderness (Broads) active in Delta, Montrose, Ouray and San Miguel Counties. Our organization would like to highlight some concerns with the stakeholder process and online survey being coordinated by a recipient - COPMOBA/RAT - of a 2019 non-motorized planning grant. These comments are not intended to discredit anyone involved in the trail planning efforts, but rather to elevate a process that 1.) may often be more the rule than the exception in trail planning and 2.) does not engage diverse voices to the extent that our organization believes will produce the best regional trail plan.

You may recall that our organization submitted written comments regarding this application (attached) and I provided oral comments (by telephone) following the applicant's presentation. A focus of our comments was concern that the grant application did not include truly diverse stakeholders and that we anticipated habitat fragmentation as a result of additional trails in the three proposed areas. This letter will only address the first concern – namely process and lack of representation from diverse voices.

Beginning with the drafting of the grant, no recreation users other than mountain bike groups were involved even though we have an active climbers' alliance, regional equestrian group, numerous outfitters and many avid hikers and backpackers in our area. We are grateful that local CPW staff were consulted (per application guidelines) and provided valuable guidance. It also appears that USFS personnel and the Town of Ridgway were informed of the intention to apply since both entities provided letters of support.

Following the awarding of the grant, the first virtual stakeholder meeting (held 6/2/20) was apparently intended for agency personnel and COPMOBA and RAT. With some self-advocacy, Broads and Backcountry Hunters & Anglers (BHA) were invited. I strongly recommended that our local equestrian group, climbers' alliance, avid hikers, wildlife and bird watchers, Ouray Trails Group (that in cooperation with USFS maintains ~300 miles of trail in our region,) Colorado West Land Trust, and ranchers (with allotments near or in the proposal areas or property adjacent to these areas) be invited.

I was encouraged by the paid coordinator of the grant to invite them all, however as far as I know, the coordinator invited only two of these additional stakeholders to the June meeting. It seems to our members that if the grant awardee proposes to involve diverse stakeholders, the task of welcoming and inviting many voices to the table should rest with the grantee – not with one or more concerned stakeholders. Broads is always happy to network and reach out to partners with communications, however the onus should not be on us to achieve a diverse stakeholder group. It is worthy of note that no USFS personnel were present at this first stakeholder meeting even though the three landscapes proposed for trail improvements lie within Forest Service lands. Broads was also disappointed in the meeting notes provided following the meeting. (See attached notes.) There was rich discussion regarding concerns for wildlife, potential conflict with various user groups and habitat protection, but none of these discussions were captured in the notes.

The second stakeholder meeting (held 8/28/20) was a public meeting to gather input from the community. It is unclear to me how widely the meeting was publicized though I did not see an advertisement or calendar item in our local newspaper. Twenty people attended via Zoom. Again, no one from the Forest Service attended and though our organization reached out to other user groups and ranchers, diverse participation was limited. CPW and BLM were represented. I was pleased to see OTG present along with a representative from Black Canyon Audubon (invited by me.) Again the conversation was both deep and wide raising concerns and sharing enthusiasm for the project. Perhaps I was struck most by the announcement that the meeting discussion would not be reflected in meeting notes but rather attendees were directed to repeat/report their oral comments in the online survey. So much transpired in that meeting including a request to convene a group of wildlife experts to delve deeper and provide recommendations. That request was denied, and the hour-long conversation was not documented for review by participants or by those unable to attend.

We are appreciative that the deadline for the online survey www.copmoba.org/ridgway originally set for September 30 was extended to November 30, however the content of the survey raises several concerns regarding bias that we believe will skew results.

Our members were quite disturbed by the initial questions asking why the user accesses trails:

*Which of these activities do you participate in? **

Mountain Biking

Hiking

Trail Running

Horseback riding

Hunting

Fishing

XC Skiing/snowshoeing

Dog walking

*Which is the primary reason that you use trails? **

Recreation

Health & fitness

Commuting

Note the COPMOBA/RAT survey offers limited responses without a choice for "other" and a write-in option. There is no option for wildlife watching, photography, rejuvenation, artistic endeavors, or contemplation - reasons many of our members visit our public lands.

None of the questions offer "none" or "other" with a write in option as answers and two questions in particular drew significant attention and concern from our members. Those questions are:

Which improvements are most needed in this area?

Which types of trailhead amenities are important in this area?

The survey, as written, assumes the respondent desires additional infrastructure or improvements. As a result, the survey is biased toward increasing development. Perhaps a survey respondent doesn't want any improvements or amenities. The respondent cannot proceed with the survey if s/he does not respond to each question with one of the possible multiple-choice answers. Therefore a respondent must select an improvement or amenity respectively in order to continue and only at the very end of the survey does one have the opportunity to write comments.

Since the survey is still open as of this writing and the data analysis has yet to take place, we do not know how the results will be presented, but we are certain they will not reflect all trail users given the limitations of the survey.

Again, we do not wish to disparage the grantees, their organizations, or any agency staff. We strive to work collaboratively with all of them. We use our experience with this particular process with intention to inform future review and evaluation of grant applications by STC. Specifically, we encourage the STC to revise their grant guidelines and criteria for applicants and to hold grantees accountable for bringing diverse stakeholders into the planning process. We request that you focus attention on three questions:

Which diverse stakeholders (who) will participate in your planning process? (Goal)

How will you recruit these stakeholders? (Methodology)

How will you measure success toward this goal? (Evaluation)

As an aside (but relevant) our organization hopes you will take a similar approach when forming the proposed Regional Partnerships/Cooperatives!

Thank you for your consideration of our organization's concerns and suggestions. We hope our feedback will improve not only your grant process, but also the trail planning that ensues into the future. Please do not hesitate to contact me if you have questions or desire further discussion of this topic. We appreciate your work as members of CPW's State Trails Committee.

Respectfully,
Robyn Cascade, Volunteer leader
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