



December 7, 2020

Thank you again for the opportunity to express the concerns of Great Old Broads for Wilderness (Broads) regarding the Trails Program at your December 4<sup>th</sup> Recreation Trails Committee (RTC) meeting. Contrary to one statement made during the Roundtable (if indeed it pertained to me,) I did, in fact, stay in the meeting following my comments. However, I left the Zoom video platform and moved to listening by phone, as I needed to travel. I did drop the call for about 20 minutes due to lack of reception, but rejoined for the last two Trail Coordinator reports and the Roundtable. Though I raised my hand (by pressing \*9) four times during the Roundtable, I was unable to join the conversation and learned later that typically the public does not participate in the Roundtable anyway. Therefore, I am writing this follow-up letter to address some of the comments made during the Roundtable.

I appreciated the robust conversation catalyzed by the three public comments and noted these salient (though not exhaustive) takeaways.

One or more members of the committee expressed:

1. A concern that the public is not aware of the role and responsibility of the RTC
2. A feeling of being vilified by the public comments specifically the use of the term “negligence” in my statement
3. A desire to reflect upon the role of the RTC
4. An interest in the RTC learning more about wildlife concerns and habitat fragmentation
5. A frustration with how to address wildlife concerns when the committee members are not wildlife experts and the Trails Program has a process for review of grants by CPW wildlife staff

I appreciate the opportunity to respond to these points:

I want to first address the notion of vilification of the Committee or its members. Broads is grateful for the progress made in elevating wildlife concerns within the grant criteria. We feel it is a step in the right direction, but not yet sufficient to account for the deleterious effects of trail proliferation causing habitat fragmentation. Second, we appreciate the separation of the construction and

maintenance grant applications and a higher emphasis being placed on maintenance of existing trails. Though I intended to acknowledge these two improvements in my oral comments last Friday, two minutes for public comment is very brief, and I had already removed two other paragraphs from my statement to meet the time constraints. So I apologize if committee members felt unappreciated or vilified or that your hard work was not sufficiently recognized. None of these results were intended.

Pertaining to the role of the RTC, it would appear from the Roundtable discussion that the sole responsibility of the RTC is to review grant applications and distribute funds based upon those applications and grant criteria. I did a bit more reading on the RTC webpage and learned the committee has a broader, more comprehensive role. Directly from the RTC webpage:

**The roles of the Recreational Trails Committee (RTC) are to:**

- Advise Colorado's Trails Program on strategic and policy issues.
- Review trail grant procedures and funding programs.
- Provide a liaison with trail user groups.
- Help plan and participate in the Colorado Trails Symposium and other events.

From the *COLORADO PARKS AND WILDLIFE COMMISSION POLICY TITLE: RECREATIONAL TRAILS COMMITTEE* Effective Date: December 8, 2011 (Bold type below is my emphasis.)

33-11-105 (2) The committee shall meet not less than four times annually to **advise the division on all matters directly or indirectly pertaining to trails and their use, extent, and location** and the objectives and purposes of this article.

5. GRANT REVIEW AND RANKING SUBCOMMITTEES

4. **The Committee shall weigh all relevant factors and public comment in formulating its recommendations** to the Commission concerning the funding of each State Trail Grant on an annual basis.

\*\*\*\*\*

So although “wildlife” is not mentioned in the statute or policy, we interpret the text above to indicate that the RTC has a responsibility to address the impacts of trails and recreation on wildlife and perhaps on other factors such as waterways, riparian habitat, livestock grazing, etc.

Broads would totally support the contemplation by one committee member that perhaps the RTC delve deeper into a reflection and analysis of their role

particularly in accordance with the four bullet points listed above and on the RTC webpage.

Furthermore, our organization would be delighted if, as suggested by a member, the Committee were to embark on educating themselves about trail impacts on wildlife species, migration corridors, wildlife habitat, and even other sensitive habitats such as alpine, riparian and botanically diverse areas (as identified by Colorado Natural Heritage Program.)

When it comes to how the Committee could address wildlife impacts and habitat fragmentation, Broads would recommend the following:

1. Consider a paradigm shift in the Committee's perspective and focus, where consideration of ecological values is paramount in your analysis of trail development and grant applications. That is to say, you place as much (or more) emphasis on protecting unfragmented habitat as you do on meeting the demands of recreation users. I have often stated that this might mean a mountain biker needs to ride a loop twice to achieve the miles s/he desires, or a hiker might have to share the trail with motorized vehicles. At a certain point (which Broads believes we are fast approaching if we are not already there) we need to question the "need" for additional miles of trail - especially any trails that penetrate unfragmented habitat. An evaluation of "want" vs. "need" might be valid.
2. Educate committee members on wildlife and habitat protection concerns as suggested by a member during the Roundtable discussion.
3. Incorporate required use of the updated *Planning Trails with Wildlife in Mind* handbook into the grant criteria for all grants. Identify the handbook as a critical document and tool that should guide trail planning, construction and maintenance rather than considering it an ancillary resource for applicants.
4. Continue to revise the grant criteria so that 50% of the points are attributed to wildlife and habitat protection including avoidance of impacts on wildlife habitat, mitigation of impacts, and restoration of already disrupted or fragmented habitat (such as closing existing trails seasonally or permanently, reseeding disturbed areas with native seed, rerouting trails, etc.)
5. Require, in any Planning grant application, a list of the so-called diverse stakeholders (individuals or organizations) who will participate in the trail planning process if a grant is awarded. Give points to this requirement in the grant criteria to guarantee compliance. If an applicant has not done their homework to know who those individuals and organizations are prior to submission, the application should be scrutinized by the subcommittee, as the absence of this roster is an indication that the applicant has not yet engaged with these diverse users. We would suggest the following list to choose from (in addition to agency personnel) as a start:

- a. motorized users
- b. mountain bikers
- c. hikers/backpackers
- d. equestrians
- e. wildlife watchers & advocates
- f. sportsmen & women
- g. ranchers
- h. outfitters
- i. artists, photographers, creatives
- j. existing trail crews in the region
- k. elected officials
- l. municipal or county recreation staff
- m. private property owners in vicinity of proposal
- n. other individuals or non-profit representatives with an interest in the proposed project such as geology enthusiasts, water protectors, botanists, historians and/or cultural site experts

Broads recognizes that the Committee cannot expect an applicant to include ALL these stakeholders, but please acknowledge that they ALL have an interest in trails and trail use. For a grantee to convene a stakeholder group with agency personnel and a few trail users from one or more of the above-mentioned groups is not what we consider diverse. Given the comments from the representative from Black Canyon Audubon Society, it appears other trail users feel similarly about diverse participation in the trail planning process. Insist this component of the application is required in the post-planning project report to ensure accountability.

- 6. As suggested by the Backcountry Hunters & Anglers representative during his comments, place a moratorium on future Planning Grants until the above conditions are met.
- 7. Distribute funds to maintenance grants, education and enforcement, and habitat restoration as I recommended in my oral comments until a comprehensive analysis of impacts of trails is integrated into RTC's decision-making and grant selection process. Much of this research is readily available. Please don't hesitate to contact me if you need citations.
- 8. Finally and importantly, encourage participation in the RTC by wildlife or ecology experts. These experts could be retired or former federal or state agency staff and representatives from non-profit organizations and/or the private sector. We recognize that the CPW Commission appoints RTC members via an application process, however given the advisory capacity of RTC as indicated by the first bullet in roles of RTC above, RTC could make a recommendation that one or more of the appointees is both a trail user and a wildlife expert by profession or an avid, knowledgeable wildlife enthusiast by avocation.

In closing, we certainly hope these suggestions and comments are accepted with the understanding that they are offered respectfully and sincerely in response to comments heard during the Roundtable discussion. At least one member requested ideas, so we are providing some from our perspective and in alignment with our organization's mission. Broads values our cooperation with many factions of CPW including this Committee and the Program Manager, the Commission, and district, area and regional staff. We look forward to continuing our collaboration and would welcome your feedback to this letter. We recognize many of the recommendations above constitute a major shift in thinking, practice, process and perspective. We don't expect change overnight, but we do see a path forward that can balance sustainable recreation and preservation of healthy ecosystems - two values that Coloradoans cherish. Thank you for reading this lengthy letter and giving it your consideration.

Respectfully,

Robyn Cascade, Volunteer Leader  
Northern San Juan Broadband  
[northernsanjuanbroadband@gmail.com](mailto:northernsanjuanbroadband@gmail.com)