November 21, 2019

Dear Deputy Director Robertson,

Thank you for the opportunity to comment on the USFS Region 2 Trail Stewardship Strategy (R2TSS.) This letter represents comments from Colorado’s 11 regional chapters of Great Old Broads for Wilderness representing over 2000 supporters across our state. Great Old Broads for Wilderness is a national organization, led by women, that engages and inspires the activism of elders to preserve and protect wilderness and wild lands. In our stewardship, education and advocacy work, we place a particular emphasis on large landscape protection. In these times of exploding population, increasing recreation use, and unpredictable climate, we focus on minimizing habitat fragmentation and maintaining ecosystem integrity and resiliency.

We applaud Region 2 for preparing a document that encourages collaboration among partners and attempts to provide a strategy for sustainable recreation. We appreciate your making a draft available for public review. We offer here some overarching comments as well as some specific language, comments and questions embedded below in your original draft.

1. First and foremost, we note that the R2TSS emphasizes increased recreation access and trail proliferation and linkage over protection of natural resources. Though we see references to consideration of the environment throughout the document, we are gravely concerned that recreation is prioritized in a time when wildlife populations are decreasing and negatively impacted by extractive industries, encroaching development, recreation, and climate change. Federal and state land management agencies must encourage protection of expansive landscapes and minimize habitat fragmentation. Consideration should also be given to riparian habitats where trail use can cause erosion and degrade stream banks resulting in turbidity, reduced water quality and impacts on aquatic species. We suggest prioritization of natural resources be a constant thread and message throughout this document.
2. There is no mention anywhere in R2TSS of climate change and consideration of this critical factor in your strategy. We strongly recommend you directly address climate with regard to the need for trail rerouting and/or closure as all species (not just animals) are forced to migrate in order to survive drought, floods, wildfire and other conditions brought on by changing climate.
3. A purpose statement for R2TSS is missing and would be beneficial (under a heading at the beginning of this document) in focusing the USFS’s goals and clarifying to partners and the public the desired outcomes. Currently this purpose must be inferred from other sections of the document.
4. Our organization advocates for trail planning that fully considers the best available science regarding impacts on natural resources with the goal to minimize any deleterious effects on ecosystems, habitat connectivity and all species. We recommend minimal new trail construction in the backcountry in spite of increasing recreation demands. Emphasis should be directed at maintaining existing trails and linking trails close to population centers. We recognize that this may result in users having to ride the same trail more than once to achieve their desired mileage, but that might be the restraint and compromise required to protect natural resources.
5. When considering trail stewardship, human waste and the resulting contamination of water and soils must be given high priority attention. Human waste is a critical issue on public trails and at destinations (especially around lakes and riparian habitats) and impacts the environment as well as human health. Declaring your commitment in collaboration with ALL partners to address this issue should be explicitly stated in R2TSS.
6. R2TSS also fails to adequately address user created trails. Under no circumstances should user created trails be condoned, ignored or considered for legitimizing as recognized official trails. Any of these actions by the agency imply to the public that user creation of trails is negotiable or even acceptable. Identified user created trails should be decommissioned immediately. A zero tolerance for user-created trails is critical in minimizing habitat fragmentation and sending a message to users that such abuse of public resources is unacceptable.
7. Our experience with trail planning processes has revealed that typical partners in planning, designing, and decision-making related to trail systems include agencies and recreation users. Glaring omissions of stakeholders at the table include conservation organizations (specifically those with wildlife and/or water concerns) and sportsmen and women. These stakeholders should be explicitly mentioned in the text referencing partner organizations. Furthermore, R2TSS should explicitly identify how the proposed collaborative process will be implemented. How are stakeholders identified? What is the vehicle for shared stewards to talk to each other? Do you anticipate an advisory council, a trails roundtable, a facilitated series of meetings, or ?
8. In keeping with our concern for landscape level planning, it appears –though not entirely clear – that repeated references to sustainability and resiliency refer to the trails and trail networks rather than sustaining ecological integrity and resiliency. The use of the term sustainability needs clarification. Similarly, the term stewardship lacks clarity as many stewardship organizations have a recreation focus, whereas others view the term in relation to stewardship of natural resources.
9. Though we recognize the need for additional funding sources outside the agency for recreation management and trail maintenance, we are deeply concerned that organizations that contribute financially to projects are given greater decision-making power in the planning of trails. Money should not be able to buy one’s desired trails in a national recreation system that is managed for everyone’s use. Furthermore, and perhaps more importantly, decisions regarding trails must be based upon best available science and what management practices are best for the ecological integrity and resiliency of an ecosystem – not on who has the money to fund a project.

Below, please find our comments and revisions embedded in your original document. Green text is offered as new or revised language. Red text is comments and questions.

ROCKY MOUNTAIN REGION

TRAILS STEWARDSHIP STRATEGY

DRAFT November 6, 2019

# Message from the Regional Forester (\*DRAFT\*)

The Region embraces its role as a community member, steward of natural resource, and key provider of access to public lands. Together with partners, volunteers, and friends, the Rocky Mountain Region manages more than 21,000 miles of non-motorized and motorized trails, and provides recreation access for more than 28 million people annually on over 22 million acres of public land in Colorado, Wyoming, South Dakota, Nebraska, and Kansas. We have a responsibility to ensure the region’s trail network is ecologically, socially, and economically sustainable. To achieve this, we will increasingly embrace and build upon the innovation and energy of partners, volunteers, agency leaders, and employees—seeking out new relationships and new solutions. We will leverage the energy, talent, and resources of the trails community by sharing stewardship and making trails and trail management a collective priority. We take issue here with the building and managing trails as the priority when protection of the resource should take precedence with recreation permitted where it does not have deleterious impacts. We will collaborate with partners - including conservation and wildlife organizations - to ensure the protection of fish and wildlife habitat, minimize habitat fragmentation and address human impacts including user-created trails and human waste.

Based on input from partners around the Region, we are building a shared stewardship trails strategy to provide valued trail experiences, sustain fish and wildlife resources, foster economic prosperity, and inspire public health around the Region. This strategy tiers to and compliments the USDA Forest Service *National Strategy for Sustainable Trail System* and Rocky Mountain Region *Leadership Intent for Outdoor Recreation*.

The strategy addresses priorities and interests we have heard from our diverse and numerous partners over the past year. Do these partners include wildlife watchers and enthusiasts, hunters, anglers, birders? It also tiers to core recreation intent documents (a rather incomprehensible phrase) States across the region rely on, including Statewide Comprehensive Outdoor Recreation Plans (SCORPS), Wyoming *Governor’s Task Force on Outdoor Recreation*, and the *Colorado Statewide Trails Strategic Plan*. Perhaps this is a place to mention CO Governor Polis’ wildlife executive order.

Over the next several years, this strategy will help guide how we work together to share, steward and enjoy a sustainable system of trails across the Region while simultaneously prioritizing protection of natural resources. It is also important to note upfront this is a strategy, not a decision document. Site-specific analysis is still necessary to approve specific trail projects. This strategy will guide where and how trail change occurs over time.

Join us! Together, we can ensure a lasting trails legacy and resilient, intact ecosystems for generations to come.

# COMMITMENT

The Rocky Mountain Region of the USDA Forest Service is committed to caring for the land and natural resources (the term land doesn’t suffice to encompass water, forests, species, etc) ~~and~~  while serving people by connecting them with their public lands.

Well-located and well-cared-for trails are a vital way for visitors and communities to reach and explore these lands and enjoy the multiple health, wellness, and economic benefits of outdoor recreation.

Recognizing the importance of working cooperatively across organizations and jurisdictions, the Rocky Mountain Region is committed to a shared stewardship approach in providing and managing a sustainable system of trails and diverse opportunities. Again, no mention here of resource protection as a priority.

# What is Shared Stewardship?

*“Shared stewardship can bring partners and stakeholders together across shared landscapes, capitalizing on existing tools and authorities, to set mutual goals and priorities, analyze tradeoffs, and help decide where to make the investments needed to achieve the cross- boundary outcomes desired by all.”* – Towards Shared Stewardship Across Landscapes, USDA Forest Service

Shared stewardship is about working together in an integrated way to make decisions and take actions on the land. This concept is not new to recreation management; the Rocky Mountain Region is making a purposeful and deliberate shift from a model of the Forest Service attempting to “do it all” to meet the expectations and needs of trail users and stakeholders, to a model where the Forest Service, trail users, and stakeholders form a collective community of stewards who provide support to and receive shared benefits from trails. This model, as described above, still prioritizes recreation over the resource and makes no mention of conservation organizations, scientists and wildlife advocates as stakeholders. Perhaps this could be the place to articulate how the collective community will be identified, how stakeholders will come together, envision plans, and make decisions.

This shift will not always be easy. We are committed to navigating this shift, balancing the Forest Service’s responsibilities for resource conservation and land management while empowering shared stewardship partners, as well as continuing to listen, learn, and become more efficient and effective as we move forward together.

# The Need for a Shared Stewardship Trails Strategy

Maintaining and enhancing a sustainable trails network is a challenge which requires coordinated efforts by numerous stakeholders and landowners with a diversity of interests. Our “Business as usual” is not achieving the pace and scale of needed trail stewardship, and is unsustainable. What does this statement mean exactly – not enough money or human power? too many trails to feasibly maintain? It seems apparent that R2TSS should emphasize the need for trail maintenance rather than new trail construction given limited resources.

# Why?

The purpose of a shared stewardship trails strategy is to:

* Raise awareness of trail~~s~~ maintenance as a collective priority. We don’t support prioritizing “trails” over resource values.
* Strengthen the trails community around a common foundation of shared roles and goals in managing a sustainable trail network for current and future generations.
* Define shared a stewardship model for the trail network.
* Define shared goals. This document lacks guidance regarding process. How (through what structure or process) will goals be defined by shared stewardship members?
* Provide a foundation for prioritization of collective efforts, focusing on the protection of natural resources when building upon input from numerous partners and stakeholders.
* Enhance public connection to and enjoyment of the outdoors with a commitment to improving access for underserved populations.
* Increase the pace and scale of trail maintenance.
* Address challenges to maintaining and enhancing a sustainable trail network across the Region: excellent bullet points
* Changing regional demographics, and aging volunteers
* Increasing visitation and demand
* Changing technologies and data applications
* New forms of recreation
* Increasing vehicle size and parking requirements
* Limited agency funding and capacity
* Tree mortality and trail blockage
* Wildfire threats and impacts
* Impacts to ecosystem integrity and fish and wildlife
* Trail use conflicts
* Continuity and turn-over of staff and partners
* Distinct needs spanning diverse landscapes and communities

# Guiding Principles

* The strategy is built upon “what we’ve heard” from partners -which partners? – R2TSS doesn’t seem to represent conservation voices, wildlife advocates, sportsmen and women, birdwatchers…, as well as the Forest Service mission, rules, and regulations.
* Multiple use trails foster a shared trail stewardship ethic, and make us better stewards.
* Social, ecological, and economic sustainability serves as the guide for year-round trail stewardship and use. Year-round use is not sustainable in lots of places in region 2 due to winter/spring moisture, reproduction areas, critical winter habitat, etc. Winter motorized use as well as non-motorized use such as fat tire bikes and even skiers/snowshoers can have a devastating impact on wildlife trying to survive in winter conditions. Similarly, some areas may not be appropriate for spring or summer use due to nesting, calving, etc.
* Recognizing and protecting ecological health is an essential foundation for ensuring sustainable recreation opportunities which under some circumstances means no recreation development in some areas and the need for closure of existing trails in sensitive areas.
* We will work collectively to share stewardship of the trail network with community partners, state agencies, conservation organizations, and trail users. Engagement in trail activities strengthens a sense of ownership and responsibility.
* Volunteers and service corps are the backbone of shared stewardship success and invites participation by people of all ages, backgrounds, and abilities to experience the outdoors, while protecting and conserving cultural and natural resources.
* We must look and work across boundaries to provide a sustainable trail network. This term sustainable trail network is used repeatedly before it is defined below.
* The trail system of the past shall not define the trail system of the future; we must adapt to changing ecological, social, and economic conditions.
* Consider new ideas and ways of doing business.
* Align with and support other agency’s current and on-going sustainable trail programs.
* Ensuring the safety of visitors and those implementing trail improvements is a priority.
* Unify different trail use interest groups around a shared value of conservation of natural resources and ecological values, “public land access” and a purposeful, legally created trail network.

# Agency Core Values

The Forest Service recently described core values in a “This is who we are” guiding document. These values are: service, interdependence, conservation, diversity, and safety. This trails strategy embraces these values and in the spirit of working together we invite partners, volunteers, and friends to join us in shared stewardship. Further, we recognize the agency and partners have identified other trail values, which inform this strategy. The Forest Service National Strategy for a Sustainable Trail System identifies seven core values: Safety, Sustainability, Commitment, Access, Inclusion, Communication, and Relationships. It is unclear if “sustainability” in this context includes resource protection or just trails that are sustainable. This document repeatedly and continuously omits definitive protection of ecological values.

# WHAT DOES A SUSTAINABLE TRAIL REFER TO?

Social, ecologic, and economic considerations are essential elements of a sustainable trail system. Sustainability is achieved at the junction where trails are socially relevant and supported, ecologically resilient, and economically viable. Is it the actual trail that is ecologically resilient or are you advocating for trails that do not negatively impact ecosystems? Thoughtful consideration of designed and managed use to meet user expectations, assuring trail sustainability on the ground, and maximizing opportunities for funding, grants, partnerships, and volunteers will foster our success. If any of these elements is missing or broken, a trail is not sustainable.

1. Social sustainability: A sustainable trail system should meet the desired experience of the various user groups, and the communities the trail system supports; it should also be adaptable to future expectations and needs. We also recognize that access to a diverse and sustainable trail system supports community health and tourism, bolsters property values, and serves to attract and retain industry and employees throughout the Region.

2. Ecological sustainability: A sustainable trail system requires planning, design, location, and construction, and generally conforms to USDA Forest Service National Quality Standards for Trails. Trails will always be in a dynamic state requiring ongoing maintenance. It is increasingly important to consider whether trails should be closed entirely and not “replaced” mile for mile in another location, relocated from critical wildlife habitat, or use should be managed seasonally to protect wildlife health. In addition, proliferation of user-created trails can negatively affect ecosystem integrity and detract from our ability to maintain system trails to standard.

3. Economic sustainability: A sustainable trail system is expensive. Forest Service appropriated funding covers part of the cost; however, it is not adequate by itself to support management of either existing or new demands for trails. Therefore forests and partners must work together to prioritize funding and resources, leverage partnerships, develop a robust volunteer program, share expertise, and pursue alternate and creative funding sources to meet trail priorities. The Forest Service commits itself to conservation of natural resources in the planning process regardless of the source of funding.

# ASPIRATIONS FOR A SUSTAINABLE TRAILS SYSTEM

## Welcoming and Inclusive Thank you for highlighting inclusivity (Multiple Use, Removing Barriers)

We will work together with partners to provide a welcoming and inclusive environment where everyone is valued, regardless of age, ability, cultural background, and recreational preferences.

* Goal: Support trails and trail programs which promote diverse, equitable and inclusive use.
  + Strategy: Improve communication, highway and trail signage, and common messaging.
  + Strategy: Support youth and underserved communities by providing employment opportunities and guided experiential development.
  + Strategy: Develop and promote trail user code of behavior (“Be Nice, Say Hi!”).
  + Strategy: Work with communities to connect them to forests by trails, public transportation, outfitters and guides, and ride share.
  + Strategy: Engage partners and users in activities such as citizen science projects that contribute to the growth of scientific knowledge specific to the lands that stakeholders know and value as well as stewardship projects that bring diverse users together with a common goal to benefit the resource and recreation.
* Goal: Develop, maintain and nurture relationships with the public, specifically trailhead communities, volunteers, and user-group clubs and organizations, to improve open communication and empower stewardship within the trails community to invest in these world-class and diverse trails.
  + Strategy: Strengthen relationships and develop more effective partnerships to improve volunteer efforts for the future.
  + Strategy: Engage with communities, volunteers, industry, tribes, and other interested parties in the early conceptual stages of trails projects. The operative word is “early.” Too often in trail planning a design consultant and/or user group is far along with a plan before any other stakeholders are engaged in the process.

## Access (safety, construction, maintenance, trail clearing, design, managing use,)

We will work together with partners to continue to provide enhanced and diverse recreational access.

* (bullet needs correcting. Sorry!) Goal: Increase and enhance access to high-quality recreation settings, experiences, and opportunities by:
* Strategy: Collaborate with willing partners to connect trails across federal, state, local, Tribal and private lands if, and only if, habitat fragmentation does not result.
  + Strategy: Adapt to increasing population and trail use through deliberate and creative trail and trailhead development, recognizing that development encourages increased use and may be more appropriate for urban trailheads. ~~and~~ Work with communities to prioritize front-country investments and manage human impacts including but not limited to human waste.
  + Strategy: Strive to keep trails passable. If trails cannot be kept open with agency resources, consider decommissioning trails or develop creative partnerships to open and maintain trails. Educate the public to practice restraint when the USFS needs to close trails when agency resources are inadequate to maintain trails (for example following big avalanche years and/or insect infestation.) Please do not authorize the use of chainsaws in wilderness!
  + Strategy: Develop a new trail standard what does this mean? for non-system trails to enable the Region to manage them sustainability. Examples of non-system trails include climber access, river access, trails in permitted ski area boundaries, trails built and managed under permit by communities, and high altitude trails on the fourteen thousand foot peaks. Are you referring to social trails? Does this mean that these non-system trails will be included in the official trail system without the benefit of NEPA planning?
  + Strategy: Work with local communities to evaluate user created trails for either inclusion in the trails system Absolutely NOT. Please do not condone/encourage user created trails! or for closure and decommissioning based on trail sustainability, and community values and interests.
  + Strategy: Work with local communities to prioritize, evaluate and manage trails for a diverse array of traditional and emerging foot, stock, mechanized, and motorized uses through travel management and other planning analyses.
* Goal: Trailheads are signed, locatable, secure, and people are comfortable visiting them.
  + Strategy: Foster relationships with local law enforcement agencies to help monitor trailheads. Though this is a positive strategy and local law enforcement can support agency LEOs, recognize that local law enforcement is another entity that is understaffed and underfunded. In some areas, trailheads are a dozen or more miles from communities. Also note, placement of trails can impact neighborhoods near the trailheads as well as road departments and law enforcement because of increased use, parking issues, theft and safety, increased fire danger, etc. So nearby municipalities and neighborhoods residents are stakeholders that must be considered in trail placement and trailhead planning.
  + Strategy: Focus efforts to ensure trailhead facilities and parking areas appear welcoming and well cared for with a particular acknowledgment of needs for adequate and clean restrooms.
  + Strategy: Focus resources to ensure the most heavily used portion of trail from the trailhead is maintained to standard.
* Goal: Provide and use accurate and relevant data.
  + Strategy: Ensure agency trail data is at least 95% accurate, aligns across boundaries, is shareable, and encourage entrepreneurs to find new applications for its use.

## Conservation Please put this at the top of your list of aspirations

We will work together with partners to preserve habitat and sustain fish and wildlife.

* Goal: Sustain wildlife resources and ecological integrity
  + Strategy: Use best available science and include scientist in the conversation when planning and managing trails.
  + Strategy: Minimize habitat fragmentation and resource damage with a goal of preserving large landscapes for biodiversity, migration corridors, and anticipated movement of species due to climate change.
  + Strategy: Identify trails that are within critical wildlife and riparian habitat and close or relocate them immediately. Relocate trails out of critical fish and wildlife and riparian habitat where research indicates recreation is having a significantly negative impact. We emphasize that it is unconscionable to adopt a strategy that waits until the resource damage has occurred if there is prior knowledge that the environment is sensitive to degradation due to recreation.
  + Strategy: Do not construct trails in critical wildlife habitat or across landscapes that fragment habitat. Consider seasonal limits on trail use for wildlife benefit where research indicates recreation is having a significantly negative impact.
* Goal: Promote Leave No Trace ethic to protect landscapes for current and future generations.
  + Strategy: Work with State wildlife, recreation, conservation, and tourism agencies to share and amplify leave no trace, and recreation ethic messages. Work with partners to put boots on the ground to educate and modify inappropriate behavior with an emphasis on human waste concerns.
* Goal: Ensure grazing and trail use is managed to the benefit of wildlife, stock, and recreation. This goal does not make sense since research demonstrates that all forms of recreation as well as competition for forage from livestock grazing negatively impact wildlife.
  + Strategy: Work with the ranching community to identify best practices, ???what kind of practices common interests with recreation, and an ethic around shared use of trails.
  + Use best available science research and engage conservation partners, scientists, sportsmen and women, anglers and wildlife enthusiasts in the decision making process.
* Goal: Manage trails in designated wilderness to protect wilderness resources and values.
  + Strategy: Maintain or decommission, if warranted, existing system trails, and when possible, ensure the trail tread is clear of downed trees.; ~~and~~
  + Strategy: Close user created routes.
  + Strategy: Work with local partners and communities to consider when and how to decommission remote backcountry user-created routes.
  + Strategy: Engage volunteers in stewardship projects that build their sense of ownership, responsibility, and desire to self-patrol the areas they cherish with the intent to prevent resource damage including but not limited to user created trails.
  + Strategy: Educate the public about the need for restraint (as referenced in the 1964 Wilderness Act) and the fact that wilderness trails may not always be accessible especially during times of insect infestation, avalanche debris, wildfires, and/or limited capacity for trail maintenance.

## Shared Stewardship

We will work together with partners to set priorities and accomplish critical work.

* Goal: Develop a relevant trail network with the purpose of enhancing community prosperity and economic benefits. We disagree with the prioritization of this goal over resource protection.
  + Strategy: Plan, build, maintain and decommission trails to improve relevancy and sustainability of the trail network. Emphasize new trail construction, which avoid habitat fragmentation and deleterious effects on natural resources, directly serves communities or State priorities, connects existing trails, and meets other management objectives.
  + Strategy: First look within special use permit boundaries for development of single-use trails and constructed features. What does this mean? Ski areas, for example?
  + Strategy: Encourage experimentation with new management tools to accommodate increasing use while continuing to protect the resource (seasonal restrictions, directional trails, use types on specific days).
* Goal: Work across boundaries to effectively achieve shared goals.
  + Strategy: Use Shared Stewardship and Good Neighbor Authority agreements to work with State and local partners to formally manage trails across multiple jurisdictions and property boundaries.
* Goal: Build a shared workforce of employees, volunteers, outfitters, permittees, and contractors to ~~build and~~ maintain trails, and where appropriate close to population centers, construct new trails.
  + Strategy: Provide tools, training and support to realize the benefits of streamlining initiatives for environmental planning with a priority of natural resource protection.
  + Strategy: Provide trail skill training and certifications for staff, volunteers and partners.
  + Strategy: Empower trained volunteers and partners to accomplish authorized trail work without direct supervision by Forest Service staff. Excellent. We know examples of this working well.
  + Strategy: Work with permittees including outfitters and guides, concessionaires, dude ranches, and grazers to identify and share technical skills and local resource knowledge in placing and maintaining trails.

# SHIFT Principles It might be beneficial to place these principles earlier in the document.

## Principle 1: All benefit from working together to steward trails

We all benefit from working together to steward trails on land and water. Conservation and recreation are needed to sustain quality of life and provide valued experiences. Both are beneficial to local economic well-being, for personal health, and for sustaining natural resources. This is the core value of shared stewardship. Sustaining resources as part of shared stewardship is critical and essential, though repeatedly is mentioned secondarily to access/use/trail development throughout R2TSS

## Principle 2: All recreation has impacts

People have an obligation to minimize impacts across the places they recreate and the larger landscape through ethical outdoor behavior. A goal of trail management is to sustain fish and wildlife. Sustainable recreation opportunities cannot exist without maintaining ecological integrity. Indeed!

## Principle 3: Look across and respect boundaries

Outdoor recreation and conservation require a diversity of lands and waters be publicly owned, available for public access, and collaboratively cared for by looking across boundaries to support access and sustain wildlife. Encourage ongoing communication between federal and state agencies and partner organizations. Not all publicly owned parcels of land are deemed appropriate for access based upon the mission of the controlling agency. As an example, CPW state wildlife areas were purchased to benefit fish and wildlife and wildlife users. Providing a trail across one of these parcels does not necessarily meet the mission of the CPW.

## Principle 4: Connect people to the outdoors and foster economic prosperity

The agency and partners will work with communities to connect people to the outdoors and foster a sense of connection to lands where they live while encouraging economic prosperity. Recreation and natural resources provide the foundation for which many communities attract industry, retain their workforce, and plan to grow or sustain themselves.

## Principle 5: Use science to inform management decisions

The Agency and partners will conduct research, collect data, and use science to inform management decisions. Physical, biological and social science must inform recreation management. Work with tech companies to innovate and provide high quality data to provide improved customer service.

## Principle 6: Innovate to ensure long term stable funding and staffing

Stable, long-term, and diverse funding sources are essential to protect the environment and support outdoor recreation and prosperity of rural communities.

## Principle 7: Welcome all visitors to public lands

Proactive management solutions, combined with public education, are necessary to truly welcome all visitors, and realize health benefits. The act of welcoming visitors anticipates our shared need to care for land, water and wildlife, and to provide the protections needed to maintain a natural environment that provides those essential elements as well as quality recreation opportunities.

# Call to Action

*“We know that we don’t have all the answers or perhaps even the right questions. We have some ideas that seem exciting to us. We have conducted some experiments that we keep learning from, and we realize that what we envision will require continuous experimentation, co-learning, and adaptation.”* – Towards Shared Stewardship Across Landscapes, USDA Forest Service

We invite partners to join us in committing to the shared stewardship of the Rocky Mountain Region sustainable trail network. Our collaborative commitments mean the trails across the region will continue to provide high-quality trail opportunities and maintain healthy, resilient, natural settings on which recreation tourism, clean water, and economic prosperity depend. This vision and commitment will guide our continued dialog, prioritized trails stewardship, and shared success.

Finally, here are our responses to your specific questions:

1.      Does the strategy adequately explain what shared stewardship is? The definition of shared stewardship is relatively clear, however how the shared stewardship composition, engagement and process will be determined is not evident. The “what” is much more clear than the “how.”

2.      Is the need for a trails strategy clear? Per our comments above, the section on need could benefit from some clarification and description especially the “business as usual” sentence.

3.      The guiding principles are based on conversations we have had with partners over the past year; do they capture the scope and breadth of your understanding of why we are building a strategy and what we want it to accomplish? The first and most important guiding principle should be protection of natural resources. That emphasis and priority is not apparent within the R2TSS guiding principles.

4.      Is the “sustainable trails” definition clear and on point? The definition is not particularly clear as it pertains to trails that are “sustainable.” Hopefully our comments and questions illuminate ways to clarify the meaning and application as you revise this document.

5.      The aspirational goals represent the meat of our strategic intent; do these goals look like the right priorities, are they sufficiently clear, and do they address your interests in future management of trails across the Region? In an effort to continually return to the concept of protecting natural resources as a vital component of trail planning and management, the Conservation goals should be first in your list and include our suggestions and comments above.

Thank you again for the opportunity to share our perspective on trail planning, stewardship and collaboration. Given the backlog of work to be accomplished and limited human and financial resources, trail stewardship projects across Region 2 need to be prioritized. We strongly encourage Region 2 to place projects that protect our natural resources at the top of that list and emphasize trail maintenance and closures (where warranted) over new trail construction.

Sincerely,

Misi N. Ballard, South Park Broadband

Sarah Bransom, Middle Park Broadband

Robyn Cascade, Northern San Juan Broadband

Anne Dal Vera & Chara Ragland, South San Juan Broadband

Cristina Harmon, Northwest Colorado Broadband

Mary Hertert, Grand Junction Broadband

Karen Ryman, Roaring Fork Valley Broadband

Nancy Working, Mile High Broadband