**Robyn Cascade’s comments/survey response to**

**Planning Trails with Wildlife in Mind Handbook (4.17.21)**

Introduction

1. I am an avid recreationist and wildlife watcher spending hundreds of hours each year in our national forests, parks, monuments and in state parks. I am equally (if not more) passionate about advocating for the preservation of biodiversity and unfragmented expansive habitats, while considering the value of our public lands in ecosystem integrity & resiliency, carbon sequestration and ecosystem services like clean water, healthy soils and air quality. In keeping with my perspective and priorities, I want to thank you for the Planning Trails with Wildlife in Mind Handbook’s (Handbook) inclusion of science-based research and information and principles of avoidance of wildlife corridors, critical wildlife habitats, riparian areas and landscapes with sensitive species and/or fragile soils. The Handbook could be even stronger in its attention to protecting ecosystems by emphasizing protection of natural resources over recreation demands. Here I wish to mention word choice, in the Introduction text and specifically Figure 1 on page 7. Figure 1 leads with an outcome of recreation “needs” and I suggest that term be changed to recreation “desires” or even “demands.” What we as recreationists want is different than what we need. We humans as a species need air, water and shelter. Wildlife NEED unfragmented habitat and landscape-level connectivity. Sensitive species NEED undisturbed areas. Breeding species NEED protection from intrusion. These needs of non-human species determine survival of individuals and sustainability of populations. Human desire or demand for recreation does not impact our species’ survival.

**Recommendations:**

* Step A in the introduction read something like “Prioritize ecosystem integrity and unfragmented wildlife habitat while identifying suitable areas for potential trail development to address user demand.”
* At a minimum Steps A & B should reflect a balance of wildlife needs and recreation demands – not subordinate wildlife to recreation demands/desires.

2. While objective 4 on page 7 encourages use of the Handbook for collaborative processes, wildlife protection, and trail planning, if it is only considered an available and optional “resource,” it could easily become a document – whose revision is notable and that took considerable time and expertise to craft – that collects dust on the shelf and few trail proponents know about or utilize.

**Recommendations:**

* Integrate the Handbook into CPW Trail Grant and GOCO grant criteria.
* Require use of the Handbook in Regional Cooperative Partnership (COOP) practices.
* Adopt the Handbook as part of CPW policy which then can be utilized across multiple agencies especially when trail planning involves more than one government entity (such as when proposed trails cross local, state, federal and/or tribal lands.)

Chapter 1

1. I applaud the Handbook’s emphasis on true collaboration with diverse stakeholders at the decision-making table including those community members typically underrepresented at the table, marginalized or with limited resources to access public lands. I believe it might be worthy of note that collaboration does not equal consensus but rather might lend itself toward acceptable compromises. My experience with stakeholder groups in trail planning is that wildlife watchers & advocates, botanists, photographers & artists who seek nature for creative endeavors, and agricultural producers are woefully underrepresented while trail proponents dominate both in numbers and decision-making. I have submitted several comments regarding this issue to the State Trails Committee regarding a trail planning process in my own community where an online survey was significantly biased toward advancing recreation at the expense of habitat conservation and the initial stakeholder roster was limited to agency staff and trail proponents/grant recipient. The benefit of COOPs is that a stakeholder group will already be in place with (hopefully) existing trusted relationships between diverse voices such that a collaborative coalition of decision-makers can be convened readily when any trail projects are proposed. I was fortunate to hear Dr. Mike Quartuch, CPW Human Dimension Specialist, speak at a CPW Commissioner meeting and I would strongly recommend a training component re: stakeholder engagement be included with the adoption of the Handbook within the COOP funding process.

2. There exists some inconsistency within this chapter regarding what entity should lead/convene the stakeholder group. The Federal Advisory Committee Act poses some limitation on federal agencies taking the lead before the NEPA process, however experience has shown that if the trail proponent convenes the stakeholders, wildlife interests are typically underrepresented.

3. Though it may seem nit-picky, too often in the Handbook when referencing recreation and wildlife in the same sentence, the recreation “desired outcomes” precedes wildlife concerns in the sentence structure. Though subtle to most readers, psychologically speaking this sequence elevates the recreation component and places wildlife as second in importance. A simple reversal of these phrases always or sometimes would rectify this sense of dominance of recreation/human demands over natural systems and ecological integrity.

**Recommendations:**

* The collaborative process as outlined in the Handbook becomes part of the criteria for any State Trails/GOCO grants and for funding of any Regional COOPs.
* Training (virtual or otherwise) re: stakeholder engagement be incorporated into the awarding of funds for trail projects.
* Clarify discrepancy re: leadership in convening the stakeholder group (Ideally the Regional COOP could serve to solve this dilemma.)
* Require that step 2 Figure 2 on page 9 take place BEFORE any funding request for a trail proposal OR insist that Step 1 include a more diverse group of voices – not just trail proponents and land/wildlife managers.
* Change sequence of words in sentences to place wildlife first and desired recreation outcomes second as in Step 2, Figure 2 (page 9.) Read the entire document for such instances of biased order of phrases. Another example (and there are many) is the first bullet on the bottom of page 32 “Questions to ask.”

Chapter 2

1. This chapter is excellent and essential to the Handbook. The depth and breadth of the science-based guidance is critical to any trail planning process. Avoidance over minimization and mitigation is much appreciated!! Once again, the Handbook must be adopted as part of CPW policy and integrated into COOP requirements and State Trails grant/GOCO criteria if CPW expects it to be utilized to its fullest potential and truly have an impact on balancing wildlife needs and recreation desires moving forward.

2. Figure 3, page 16 is an important graphic, however it needs revision to be more clear. Every time in the flow chart where consideration of a trail should not continue, there should be a “stop,” graphic stop sign or “No trail” indicator; otherwise it appears that the evaluation process continues for both arrows. For example in the top gray box (transitioning to green avoidance) a stop should be written below the “yes” arrow. Similarly, a “no trail” or “stop” should appear in the graphic below the No arrows under the questions “Can sensitive habitat be avoided?” and “Can impact to sensitive habitat be minimized?”

3. For years, I have been concerned about the metric limiting trail density to less than one linear mile per square mile of habitat. One mile per square mile is too high a density in sensitive areas and critical habitat. (Perhaps this metric assumes sensitive habitat will be entirely avoided, but too often that is not the reality and instead (if wildlife are lucky) mitigation with seasonal closures is implemented.) With this guideline, every square mile of habitat could be bisected by a trail not allowing enough distance for the suggested buffers in Figure 4. The two considerations written on page 23 and Figure 6 are critical to the concept of trail density. Thank you!!

4. Again, this may seem picky, however the predominant tan area in Figure 5 (perhaps designed to accommodate text on a light-colored background) implies that a landscape has more area available for trails than acreage that should be avoided. I’d like to see more dark and light green and less tan to give the impression that trails should be consolidated.

**Recommendations:**

* At the risk of repetition: Incorporate the Handbook and specifically this chapter in the prerequisite reading/grant criteria checklist for GOCO/State Trails grants and Regional COOP applicants.
* Adopt Handbook into state policies.
* At a minimum, if not required in the trail planning process (as in the first bullet above,) incentivize use of this chapter in all trail planning grants. For example, award points for its use in applications
* Revise Figures 3 & 5 as described above.
* When the Handbook is released, provide virtual webinars, instructional videos and/or in-person trainings prior to the start of each GOCO/State Trails grant cycle highlighting the key concepts in Chapter 2

Chapter 3

1. In an ideal world, agencies would have the resources to educate visitors, install infrastructure, manage trails, and enforce regulations and closure. However, in reality human and financial resources limit all these functions. Natural values suffer as a consequence. An emphasis needs to be placed on compliance and user-group self-monitoring. Perhaps member organizations and individuals of the Regional COOPs could play a role here. Colorado Mountain Club Recreation Impact Monitoring System (CMC RIMS) is a tool for data collection pertaining to visitor use, signage, facilities, and trail conditions and could be included in this chapter.

2. Though I recognize the purpose of adaptive management, on the ground experience has taught me that too often the deleterious impacts occur long before monitoring incites any change in management to protect natural resources. This reality is a major disadvantage of relying on adaptive management.

**Recommendations:**

* Require/incentivize trail proponents to monitor users for compliance.
* Include CMC RIMS as a resourceful tool in this chapter
* Include a cautionary note about the potential shortfalls of adaptive management.

The appendix is a plethora of information. Thank you!!

Question 8: The Handbook is a crucial document as our state addresses ever-increasing demands by recreation users. I would like to see wildlife prioritized over recreation rather than a "balance" since my experience is the so-called balance is often at the expense of wildlife and wild places. We humans need to practice some restraint even if that means sharing the trail with multiple users or riding the same loop twice to achieve our desired miles, etc.

Question 9: Only as I was finishing these comments, did it dawn on me that I don't recall seeing climate change mentioned in the Handbook. Incorporating the need for understanding and consideration of the concept of refugia in trail planning is essential as many species (not just animals) will be migrating as our planet's climate changes.