



December 14, 2019

We appreciate this opportunity to offer our local knowledge and input regarding the COPMOBA - RAT Regional Trail Plan non-motorized planning grant application. I write as the volunteer leader of the Northern San Juan chapter of Great Old Broads for Wilderness. Our local chapter represents over 400 supporters from Ouray, Montrose, San Miguel, and Delta Counties. Great Old Broads for Wilderness is a national organization, led by women, that engages and inspires activism 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 are pleased to see an entity initiate a comprehensive trail planning effort for Ouray County as we envision and hope such a process will result in a plan that considers cumulative impacts of trails and recreation use across the landscape rather than a piecemeal project-by-project approach. We offer some overarching comments below followed by some comments relevant to specific sections of the application.

1. First and foremost, we strongly recommend that the best available science be used regarding recreation impacts on wildlife, riparian habitats, and ecosystem integrity and that cumulative impacts be considered spatially as well as over time anticipating advancements in recreation technology as well as changing climate.
2. We encourage the use (and perhaps improvement if needed) of existing trails and trailheads rather than construction of new trails in order to minimize habitat fragmentation.
3. We advocate for *avoidance* of sensitive areas when planning trails rather than employing a mitigation approach. Protection of natural resources should take precedence over recreation.
4. We expect that the “stakeholder” meetings will include representatives from conservation organizations, wildlife advocacy groups, sportsmen and women as well as representation from the agriculture community - not just agency personnel and recreation users. It is unacceptable for these voices to be left out of the discourse until the public meetings.

Letters from Federal Land Management Agencies

The letters of support from the USFS Ouray District and the BLM Uncompahgre Field Office are remarkably similar leading one to believe the agencies were given a draft to revise and personalize. Though this practice is common, we encourage confirmation that both agencies are actually familiar with the details of the grant.

Project Description

Given our organization's concern regarding habitat fragmentation, we notice minimal reference to resource protection in the project description. In addition to wildlife concerns, we ask the applicants to consider watershed protection and conservation of riparian areas with attention to erosion, stream bank collapse, water quality & turbidity, and impacts on aquatic species. We also urge the applicants and agency personnel to consult Colorado Natural Heritage Program (CNHP) data regarding sensitive plant species and biodiversity. Again, we strongly encourage trail planning to avoid sensitive habitats and prioritize resource protection rather than mitigate damages.

There is no mention of the composition of the stakeholder groups here or anywhere in the document. There is also no mention of the process by which stakeholders will be invited to participate. As mentioned above, we urge the applicants to invite diverse stakeholders to the table including equestrian groups, conservation organizations, ranchers, sportsmen and women, and wildlife advocates. As residents of the target area for planning, we are happy to provide suggestions and contacts to bring diverse voices to the stakeholder meetings.

Community Need & Benefit

Though it is rarely a popular perspective, our organization would like to state that an increase in recreation use and visitor days does not necessarily constitute a need for more trails, especially if doing so will degrade the environment. We encourage the use of existing trails both motorized and non-motorized to satisfy the needs of the biking community. Perhaps some trails need improvement or structures to accommodate bikes. Perhaps consideration of timed use for different user groups can lessen the need for new trail construction.

We don't necessarily agree that additional miles of non-motorized trails will improve quality of life for our community. We understand that recreation demands are increasing and that users want more miles, however if you are a user who values wildlife and bird watching and a slower pace, additional trails that fragment habitat might not be beneficial. Members of our organization are recreation users also, and still we ask for restraint when it comes to potential trail proliferation in order to protect the natural resources we value.

The grant criteria specifically ask for consideration and inclusion of underserved populations in the process. Though the application mentions involving underserved groups in the decision-making, this aspect of the application is very weak and does not mention how this population will be prioritized.

Urgency

We appreciate this planning process getting underway in the near future, before our region experiences resource damage from user-created trails and/or frustration and conflicts between users. The application mentions receiving "a lot of support from the local community, regional organizations, user groups, and the agencies..." and "a large amount of support from the all the stakeholders..." however there is no reference to who these supporters are with the exception of the agencies. Three of the five letters of support come from organizations based outside Ouray County and a fourth is from a for-profit business. We wish to reiterate the expectation of a demonstration of truly local support and the need for diverse stakeholder in decision-making if

this project is funded. We are thrilled that the applicant has chosen a local company Sweet and Sustainable Singletrack as their trail consultant/designer, as too often such contracts are granted to businesses from outside the community. We appreciate the applicant supporting local businesses that have knowledge of the landscape. We hope the same is true of the GIS consultant and other contractors.

Cumulative Impacts

We applaud the applicants for conferring with CPW staff to determine landscapes to avoid and areas that might be appropriate for trail improvements or construction. We reiterate that mitigation is no substitute for avoidance of sensitive areas. We also encourage the applicants to devote much attention to maintenance and improvement of existing trails as well as education regarding compliance with existing and future restrictions and seasonal closures. Our members have witnessed non-compliance in Ridgway State Park and at Ridgway's Weaver Eagle Memorial Park where cyclists have ridden in zones that are closed to bikes. We ask that mountain bikers take responsibility for ensuring compliance among their peers.

The grant criteria requests that applicants describe "How will the plan evaluate multiple trail systems' cumulative impacts..." and "How will trail development be evaluated and balanced with existing trail system management, wildlife and natural resource conservation and long term maintenance?" Other than expressing collaboration with agencies and an intention to address these criteria, there is no description of how this evaluation and balance will be accomplished.

Regarding involvement of neighboring communities on a more regional planning scale, we consider this effort beneficial and want to encourage the same type of diverse stakeholder process that we support for Ouray County. It is neither sufficient nor appropriate to merely gather representatives from the biking community without engaging conservation organizations, wildlife groups, the agriculture and business community, local governments, and sportsmen and women.

Wildlife & Natural Resources

This is, perhaps, the weakest section of the grant application, and the component that matters most to our members. We appreciate the efforts the applicant has made to work with CPW to date, however there are several very specific questions in the grant criteria that are unanswered such as "**How** were impacts to wildlife and habitat evaluated, avoided, and/or minimized? "What factors were considered to avoid large blocks of less disturbed, sensitive environmental resources such as...?" What aspects were considered to evaluate wildlife connectivity across the landscape and to avoid and/or minimize the potential for fragmentation?

Just as one example, the map of Area A in the Ironton region encompasses a rare and unique iron fen and a region categorized by CNHP as B2: Very High Biodiversity Significance. This is also the largest wetland in the Uncompahgre Valley and contains several sensitive, imperiled plant species according to CNHP.

We wonder also if the applicant has considered cultural and/or historic resources as such values are scattered across Ouray County.

Collaboration

At the risk of repetition, we urge the applicants to truly diversify their stakeholder meetings and invite individual sportsmen and women and/or groups such as Backcountry Hunters & Anglers and Trout Unlimited; conservation organizations like ourselves and Uncompahgre Watershed Partnership, wildlife advocates such as Black Canyon Audubon Society, representatives from the agriculture community and underserved populations in addition to recreation users (including equestrians such as the Lariat Saddle Club) and agency personnel. I strongly recommend the applicant also collaborate and confer with Ouray Trails Group that maintains trails in our region in cooperation with the USFS.

Implementation

We emphasize that the planning process prioritize use of existing trailheads and trails – both motorized and non-motorized before proposing new trail construction. Trail system improvements does not necessarily depend upon nor require new trailheads and additional trails. Again, we urge restraint whenever and wherever possible to protect natural resources.

Public Comment & Involvement

See above for comments regarding stakeholder group composition. The primary stakeholders should not be limited to agency personnel and biking enthusiasts.

Ensure that the invitation for public meetings and participation in electronic surveys be broadcast widely through local governments, utility bills, social media, newspaper and radio announcements, posters and personal outreach and communication.

In keeping with a desire to support our local experts and businesses, we urge the applicant to utilize local facilitators to guide the public meetings and/or mediate any conflicts that might arise among user groups.

Budget

Again, we appreciate the patronage of local consultants and experts for all aspects of this project. Our region is fortunate to have many talented planners, GIS specialists, group facilitators, mediators, graphic designers, communication specialists, etc.

Maps

- *Statewide & Local Vicinity:* In addition to the Ouray County map provided, it might be beneficial to include a map with adjacent areas given the consideration of a proposed regional approach to comprehensive trail planning and linkage across county lines.
- *Area A:* The east side of highway 550 already possesses numerous trailheads as well as motorized and non-motorized trails that are or could be used by multiple user groups. The Mears Road and an existing power line already run along the west side of highway 550 and could be utilized without further fragmenting this important wildlife habitat. Special attention should be given to 1.) The Iron Fen biodiversity and sensitive species located therein as documented in CNHP's data, 2.) Canada Lynx habitat on both sides of the highway and 3.) Big game habitat – specifically elk summer range. Although not documented on CPW's website, local outdoor enthusiasts have also seen moose in the wetlands around Ironton as well as Bighorn Sheep around Red Mountain Pass.

- *Area B:* As no doubt the applicant is aware, the Dallas Trail is already open to mountain bike use. Special consideration should be given to compliance with the 1964 Wilderness Act, which prohibits mechanized use (i.e. wheeled vehicles) in the adjacent Mount Sneffels Wilderness. If the Colorado Outdoor Recreation and Economy Act becomes law, the Whitehouse Addition to the Mount Sneffels Wilderness will abut the proposed focus area to the south on the eastern reaches of the Dallas Trail.
- *Area C:* Lots of opportunity for multiple use across this landscape can be afforded by existing trails. We do not support new trail construction in the Deer Creek/Nate Creek area. Due to riparian habitat, numerous creek crossings, livestock grazing, and critical wildlife habitat, we discourage biking along the Nate Creek Trail outside the July 4 – Labor Day window that is already designated in the Travel Management Plan for motorbike use.

Letters of Support

We commend the applicant for reaching out to other trail user groups specifically the motorized community. We do note, as mentioned above, that three of the five letters of support come from outside Ouray County, though no doubt Uncompahgre Valley Trail Riders utilize trails in Ouray County. Again, we encourage the applicant to seek the same level of support from hiking groups, equestrians, sportsmen and women, conservation groups, and wildlife advocates who recreate in Ouray County.

We are grateful for the opportunity to comment on this grant application and appreciate the initiation of a regional planning process. We welcome further communication from the State Trails Committee or CPW Commission if you have questions or need further information from our local members who recreate in the region of this proposed project and care deeply about the preservation of natural resources that sustain our physical and emotional health and drive our local economy. Thank you for consideration of our comments.

Sincerely,
Robyn Cascade
Volunteer Leader, Northern San Juan Chapter
Ouray County, Colorado