



September 16, 2021

Greetings State Trails Committee,

Great Old Broads for Wilderness (Broads) Northern San Juan chapter appreciates the opportunity to participate in public comment during your regular meetings. As you know, along with Backcountry Hunters and Anglers (BHA) and Rocky Mountain Recreation Initiative, Broads has been involved in encouraging revision of the State Trails grant criteria and we are grateful for the increased emphasis on protection for wildlife habitat to minimize habitat fragmentation due to trail construction. We recognize this year's grant program is well underway and would like to make some recommendations for additional revisions to the criteria for next year's grant cycle to be implemented for 2023 grants.

First, given the time and expertise of CPW staff and stakeholders devoted to updating the *Planning Trails with Wildlife in Mind* handbook (Handbook) and the quality of product, it would be significantly beneficial to incorporate this Handbook into the grant criteria and to assign points for adherence to its recommendations. We recognize there could be several ways to achieve this goal and would welcome the opportunity to engage in this discussion in early 2022. We believe the Handbook must not just be referenced as a resource in the grant application but in fact an integral part of scoring applications. It would be a shame for this Handbook that includes such critical science-based information and expertise and experience of so many to sit on the shelf underused.

Second, the grant application should require applicants to reach out to diverse stakeholder BEFORE submitting their applications to ensure that the project will be a collaborative effort within a community that benefits many users and avoids (or at least minimizes) impacts to wildlife. In our Broad's experience in Ouray County with the COPMOBA/RAT planning grant, the application indicated the intention to engage diverse stakeholders, however many recreation user groups, wildlife advocates and livestock producers did not know about the grant nor were they initially invited to participate as stakeholders until Broads and BHA advocated for our organizations to be included as well as other groups and individuals such as wildlife watchers, equestrians, climbers, hikers, ranchers and grazing permittees. Engaging (or at least identifying) diverse stakeholders in one's community should, in our opinion, be a prerequisite to submitting a grant.

Finally, we continue to advocate for increasing funds for trail maintenance while reducing funds for new construction in unfragmented habitat. So many existing trails need attention and upkeep, and the majority of new trails should be constructed closer to population areas or existing recreation areas, so we can preserve quality wildlife habitat that has experienced less (or no) impact from recreation.

Thank you again for being open to our comments and suggestions. Broads looks forward to continuing to engage with the State Trails Committee on these important matters.

Sincerely and respectfully,

Robyn Cascade, Volunteer Leader
Northern San Juan chapter