

Public Comment
State Trails Program Policy and Grants
May 27, 2022

Colorado Parks and Wildlife Commission

Members of our organizations have been actively engaged with the State trails program and recreational trail development within Colorado for several years. We have reviewed and provided public comment to the State Trails Committee (STC) on specific grant applications for planning, construction and maintenance projects as well as our general comments and suggestions on the overall non-motorized program. In addition we have presented our concerns and comments to the CPW Commissioners and CPW managers and staff on several occasions in an effort to recognize the impacts that trails are having on our wild lands and wildlife habitats. We thank the STC and Trails Program Manager for their consideration of public comment and particularly wish to express our appreciation for the changes made to the application process in 2019 – specifically the increase in points for wildlife and the separation of construction and maintenance grants.

We are contacting you at this time to express our desires for further improvements to the non-motorized grant process and grant criteria that we feel will improve utilization and integration of the science and planning process included in the CPW *Guide to Planning Trails with Wildlife in Mind* with an emphasis on elevating protection of wildlife habitat connectivity and diverse stakeholder engagement early and throughout the grant process. Our specific comments and suggestions were submitted to the STC on March 24, 2022.

Chapter 2 of the *Guide to Planning Trails with Wildlife in Mind* provides an extensive assessment of evaluating wildlife habitat needs on a landscape scale prior to identifying trail opportunities. These concepts are based in science and need to be reflected in the grant criteria. In addition, Appendix A includes species specific Best Management Practices that should be part of any grant application. We strongly believe this is a vital component to any grant application and have provided several suggestions for additions and modifications to the grant criteria that would elevate the avoidance, minimization, or mitigation of impacts to wildlife habitat from trails based recreation.

During the recent non-motorized grant review process we observed some procedures that could be improved to ensure there is sufficient CPW wildlife review and public involvement prior to the proponent submitting their application. The CPW website for non-motorized and LWCF trails grant applications directs the applicant to the Wildlife Review Process, and the current grant criteria requires all applicants to submit the basic project scope and a map to the Area Wildlife Manager for review and comment by early September. However, in some cases there seems to be a disconnect between the CPW wildlife managers comments captured in grant applications and the regional Wildlife Assessment Reviews submitted at time of grant scoring. In many cases the applicants indicated that they consulted with CPW wildlife staff. However, the final Region Wildlife Impact Summaries indicated concerns that were not addressed in the application. Since it is time consuming and labor intensive to review an application, it would seem prudent to flag applications early that have undocumented wildlife concerns or significant unresolved wildlife concerns. This could be avoided if applicants were required to include documentation of CPW or other federal agency review with their application.

The current grant application process does not guarantee engagement from other diverse stakeholders and community interests early and throughout the grant cycle. We have experienced some

improvement in public awareness of recent planning grants in our areas of the State, but the planning grants have only provided limited opportunities to address local concerns for conservation and other established uses. Chapter 1 of the *Guide to Planning Trails with Wildlife in Mind* has outlined a collaborative planning process that is inclusive of diverse community interests which could be enhanced in the non-motorized Trails Program through our suggested modifications to the grant criteria.

We continue to advocate for the development and inclusion of a Good Management Program within the non-motorized program that would mirror that segment of the OHV program. We understand there are currently some fiscal and policy barriers that prevent full incorporation of a Good Management Program into the non-motorized trails program. However, we encourage you to critically evaluate those barriers and determine how elements of the program can be implemented. The separation of Construction and Maintenance grants has already facilitated addressing some elements of a Good Management Program, and we support a permanent separation of these categories and prioritization of funding for maintenance. In addition, Chapter 3 of the *Guide to Planning Trails with Wildlife in Mind* addresses trail management and monitoring, and we have included suggested modifications to the grant criteria that we believe will further address some of the key elements of Good Management in the non-motorized grant program.

Thank you all for your attention to these comments and your willingness to consider our input.

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