



January 15, 2012

To: Department of Natural Resources DPW Transition Team
From: The Colorado Off-highway Vehicle Coalition and Trails Preservation Alliance
RE: Comments of the Colorado OHV Coalition and the Trails Preservation Alliance on the DPW Draft Merger Plan

To whom it may concern:

The Colorado OHV Coalition represents motorized recreationists in Colorado and the TPA is a non-profit organization that funds and supports motorized trails. COHVCO was the prime mover behind the legislation that created the OHV Registration Program in 1989 and the over \$24 million in funding for maintenance of trails including non-motorized trails additionally involving, signage, education, and safety information. We have prided ourselves as good partners of State Parks until it became obvious the years of neglect by Park's Boards and particularly Park's leadership lead to litigation against the Board.

We congratulate DNR and staff for the great deal of work done and recognize the scope and of the task ahead. Most of what has been developed appears to be headed in a positive direction. Efforts to do public outreach greatly improved over the past months. We still support the merger in concept and for the opportunity it can provide. But we have serious concerns; fortunately they are limited in nature

After many attempts to seek information regarding the changes to be made to the Trails Program, we had been assured that it would see no substantial changes. Yet, a close reading of the Draft Plan indicates the program will change dramatically in that it is being regionalized. We do not and cannot support this approach. After reviewing the Transition team membership, it is apparent that not a single member of the Trails Program was allowed to participate. Do not tell me Gary Thorson represented trails, that is barley in his purview. I am sure a few architects, accountants, biologists, Regional managers, marketing staff etc. participated. Where was Morrissey?

Parks has made the mistake twice of taking a program whose nature is statewide and primarily off state lands and squeezed it into a local control situation with poor results

and above our objections. We assure you there is not a charm. The program has been treated with little oversight, no genuine interest and, at times, petty bickering among regions. While this may be the DPW formula for success it is the public's worst nightmare.

No sense in sugar coating what the thought of four regions with other priorities, guaranteed not to be trails on federal or local government land means to us; a slap in the face.

Do you know who cares about the Trails Program? The trails staff we work with. Not biologists, not Parks managers not Wildlife managers, not the Commission and not law enforcement. We are little but a blip on their radar. Your efforts are merely to compartmentalize everything into a regional scheme. And we, who pay into it, monitor it, volunteer thousands of hours toward it will be left out in the cold.

Trying to play catch up with four regions with four different perspectives on trails will result in constant conflict as it has twice in the past. Trails is neither Parks nor Wildlife oriented in any direct sense, save the relative few miles occurring on Parks and the State Forest. It is a unique program with a unique constituency and unique service requirements.

A strong dialogue is essential between the Trails program and the regions due to the fact there are varying impacts of trails both motorized and non-motorized on wildlife. We recognize this. It is not, however, the principle statutory charge. Serving trail users is, and input from Regions is certainly reasonable but not dispositive.

In fact, the other point to be made is that Wildlife has provided input on federal Resource and Travel management Plans in a total vacuum with no input from the Trails Program. With the merger, we expect that the needs of the trails public will best be represented in future discussions directly by program staff, not more local biologists with little experience in multiple use nor reason to champion it. When the International Mountain Biking Association, equestrian clubs and others find out they are being shuffled off to staff with no knowledge of their recreational needs, they will no doubt be delighted. They may not have put two and two together yet.

The DPW as a consulting agency includes trails and the interests of trails users. We have an equal right to have our views and needs presented by state employees to the federal government. The same applies to local government. We seek a strong process and not specific outcomes. Right now the dice are loaded against us as players and the game would be busted if not for the constant protection given the old DOW in the past.

We expect this voice to be heard, we have asked for it in the past and with the merger, we demand it. It is our right. Often, the federal government and the Trails program agree; by what divine right is Wildlife allowed to blow off constitutes paying for trails because they aren't "their" constituents. We ARE their constituents it is simply that we

suffer either benign neglect or biased attitudes against the use. That has to change and only the Trails program and DPW leadership can affect that change.

While you are at it, in making changes to the implementation plan consider that a transparent process developing a joint Strategic Plan over the next five years will allow public comment as you move forward. While much of the public understands little of policy implementation and directives, many of us know it is at the heart of your attitude toward your constituents and employees. Yet, it receives none of the scrutiny required of Rulemaking. The public demands transparency and perhaps a Strategic Plan and much better public outreach on policy and directives will satisfy the General Assembly, also. We know this is of concern to them.

All in all we feel passionately about the issues raised above. Please treat them as more than mere suggestions as right now we feel absolutely betrayed by the Transition Team and leadership. How much clearer these points about the Trails program could have been made is beyond us.

Nevertheless, these are simple matters that jeopardize our support for the merger and our input to the General Assembly. We understand the agency's need for discretion, just not always at our expense. We have been positive and supported this merger in good faith. Do not, yet again drive a good partner away.

Sincerely,
Jerry Abboud
Executive Director