



March 31, 2015

Colorado Parks & Wildlife
Att: Director Broscheid
1313 Sherman Street, 6th Floor
Denver, CO 80203
via email @ dnr_cpw_planning@state.co.us

RE: CPW Strategic Plan Revision

Dear Director Broscheid;

Please accept this correspondence as the comments of the above Organizations with regard to the development of the combined strategic plan for Colorado Parks and Wildlife. The Organizations welcome this opportunity to provide written comment on the new strategic plan as often discussions that have occurred in the public hearings throughout the state are rapid in nature and often these settings make it difficult to fully analyze issues and challenges discussed in the meetings. The Organizations have welcomed the frank and candid discussions that the series of public meetings have allowed the public to have with CPW employees and managers. While there are many aspects to be addressed in the CPW Strategic Plan, the Organizations believe the Path Forward document did a reasonable job in summarizing these issues and that this analysis remains relevant moving forward. The Organizations comments will center on the critical need to maintain current programs at their historically high levels of performance in order to avoid significant damages to volunteer partnerships that have taken years to develop in association with the program. Often these volunteer partnerships are valued well in excess of the monetary disbursements of the program. The Organizations believe that failing to maintain services at historically high levels will impair any efforts to achieve financial sustainability of the merged agency.

The Organizations are aware that the CPW trails committee and CPW staff have taken a far more active role in addressing and resolving many of the concerns that are raised in these comments. These issues have been very slowly increasing over the last several years and recently have rapidly deteriorated for many reasons. The Organizations believe that the scale of problems and the speed they have impacted the program have taken all interested parties by surprise. The Organizations believe these issues may be present in many other aspects of the program and are important enough to warrant commentary in order to allow planners to address other programs that might be similarly situated.

Prior to addressing the specific concerns on the Strategic Plan, a brief history of the Organizations will help given structure to the concerns raised in these comments. Colorado Snowmobile Association ("CSA") was founded in 1970 to unite winter motorized recreationists across the state to enjoy their passion. CSA currently has 2,500 members representing the 30,000 registered snowmobile users in the State of Colorado. CSA has become the voice of organized snowmobiling seeking to advance, promote and preserve the sport of snowmobiling by working with Federal and state land management agencies and local, state and federal legislators.

The Colorado Off-Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization of representing the 150,000 registered OHV user in the State of Colorado. COHVCO seeks to represent, assist, educate, and empower all OHV recreationists in the protection and promotion of off-highway motorized recreation throughout Colorado. COHVCO is an environmental organization that advocates and promotes the responsible use and conservation of our public lands and natural resources to preserve their aesthetic and recreational qualities for future generations.

The Trail Preservation Alliance ("TPA") is a 100 percent volunteer organization whose intention is to be a viable partner, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of trail riding. The TPA acts as an advocate of the sport and takes the necessary action to insure that the USFS and BLM allocate to trail riding a fair and equitable percentage of access to public lands. TPA is very concerned with the fee proposal increase as TPA believes that any fee for a motorized usage area will have a significant precedential nature in terms of fees that may be developed for other areas in the future.

While the Organizations are most directly concerned with multiple use access to public lands, a large percentage of our members are very active in the hunting, fishing and camping communities within Colorado. CSA, COHVCO and TPA will be collectively referred to as the Organizations for purposes of these comments.

1. Overview

The merger of Colorado Parks and Colorado Division of Wildlife has been a major change for the recreational community in Colorado as these were two very different organizations and missions that played a vital role in Colorado recreational opportunities both on State and Federal lands. While these are very different organizations and missions, there is overlap of efforts and concerns of what has been the traditional user groups as many of the trails based users groups are actively involved in the hunting and fishing activity base. For many of these users they are simply unable to identify themselves as a hunter or fisher or a trails user. Trails usage is simply woven into their outdoor recreational experience. Another area of overlap between these user groups is that both the hunting and fishing community and the trail based community have embraced the user pay model for maintaining and improving their recreational experience.

The Trails Program has historically bridged gaps between the programs as the trails network is a critical component of the outdoor recreational cultural that has been so strong in Colorado as trails are a critical component of almost all types of backcountry recreation. CPW's recently completed State Comprehensive Outdoor Recreation Plan (SCORP) documented through a public opinion poll that trails based recreational activities are the most popular outdoor recreational activities on Colorado, totaling 250,000,000 activity days per year by Coloradans alone. That is 20 times more activity days per year than any other outdoor recreational activity addressed in that poll including fishing and hunting, yet CPW's offerings through the trail grant program, through its trails web site and outreach programs is extremely weak compared to the support CPW devotes to hunting and wildlife issues.

The Organizations are aware that the legislation governing the merger of Colorado Parks and Colorado Wildlife provided significant guidance and structure for the merger of the two agencies moving forward. The Organizations believe the statutory mandate governing this process is highly relevant to our concerns, as the mandate provides as follows:

"(11) (a) In addition to discharging its regular duties and functions, the commission shall specifically discuss and formulate a five-year strategic plan to address ongoing or new issues resulting after, and identify increased efficiencies and cost savings that may be realized from, the 2011 merger of the former division of wildlife and the former division of parks and outdoor recreation into the division of parks and wildlife. **The strategic plan must address how the merger has affected policies, objectives, strategies, and estimated annual fiscal costs and savings associated with the duties and programs of the division.**"¹

¹ See, CRS §33-9-101(11)a

Representatives of the Organizations were able to attend almost all of the public meetings in 2011 regarding the merger of Parks and Wildlife and have again been actively participating in the meetings and public process supporting the new strategic plan development.

In 2011 the merger of then DOW and Parks was very concerning to a wide range of users and as a result numerous assertions to the effect that avoiding erosion of the effectiveness of CPW would be high priorities in the merger were made by then Director Rick Cables and DNR Director Mike King. The Organizations were also actively involved in interim processes with CPW, such as the Partners in the Outdoors meetings and committees, in attempts to make sure that CPW continued to provide high quality services and build volunteer partnerships. The issues in these comments are concerns that have been held by the trails users throughout the process and directly impact the policy, objectives, strategies and savings achieved through the merger.

The Organizations are intimately familiar with the national recognition that the CPW trails program has consistently been the recipient of and that the fact that the CPW program is the envy of almost every other trails program and that this program plays an integral part in the management of federal lands in Colorado, where the bulk of Colorado recreational opportunities are provided. The distinguished nature of this program is not abnormal within CPW, as CPW has consistently been a nationally recognized leader in a wide range of issues including Endangered Species Issues and research, which has recently been again affirmed with CPW taking a leading role in the Gunnison and Greater Sage Grouse listing process.

2a. The Organizations are concerned over the erosion of the CPW Trails Program.

The Organizations are concerned about the erosion of the effectiveness of the Trails Program to provide funding and resources necessary for the maintenance of trails in Colorado since the 2011 merger. It has been the Organizations experience that this erosion is the result of numerous factors impacting the program rather than a single particular change. The Organizations are concerned that while the scale of the grant program has more than doubled since its inception, staffing for the program has reduced significantly. Regional Trail Coordinators were once completely managed by the Trails Program but this important resources have been made joint reports under the new organizational structures. These FTE were often playing a critical role in making the grant program work and were often able to adjust their duties to make projects work. Since the merger, there has been no replacement for these FTE and these FTE are no longer in the Denver metro region to assist in the critical role of simply making projects work. While the Trails Coordinators provide a good example of staffing issues, these issue are by no means limited to these positions.

The Organizations are also aware that the funding streams from the trails program, the timing and simplicity of which has been exceptionally critical to the effectiveness of the program overall, have become very problematic. Too often this funding is very late, difficult to obtain and sometimes simply never reaching the projects that are the basis of the grant. Simply getting approval of budgets and contracts in place after these grants have been fully approved is difficult and slow. Often accountings of grants are submitted to auditors or contracts are sought to be formed and it is literally months before any review or feedback occurs from anyone outside the program. Often this horribly delayed feedback raises concerns that involve at best minutia or concerns completely unrelated to the project.

Too often staff outside the CPW trails program are completely unfamiliar with the CPW trails program or the levels of review that Trails Grants have been undertaken before any contracts are attempted to be drawn. The Organizations are aware that often Trails Program staff are completely unable to address basic issues in this contracting process, which makes the Organizations believe input from the program managers is simply not given the appropriate weight in the balancing of interests and issues.

2b. Impacts of erosion of trails program effectiveness are becoming evident in reductions in volunteer support for Trails Program.

Many of the issues raised in these comments were recently moved forward by State Trails Committee who is now actively working with CPW staff to resolve them as quickly as possible. We applaud the Trails Committee for immediately partnering to resolve these concerns and support their efforts in taking the forefront of issue but the Organizations are concerned that too often these issues are landscape level and could be impacting other programs in a similar manner, just not at levels that can be as easily identified. Resolution of these types of systemic inefficiencies are critical in achieving the goals of the merger and maintaining high quality services.

The Organizations have been heavily involved in the development and implementation of the CPW Trails Program since its creation in 1985. It has been the Organizations experience that the Trails Program has been successful due to the partnerships that are formed between users, state program representatives and federal land managers. While the State Trails program provides significant funding for trail building and maintenance, the monetary value of this funding has always been significantly less than the volunteer hours and matching funding that are brought to bear in the grant process. As a comparison, in 2012 the trails program awarded approximately \$4.2 million in direct funding of projects to partners which was matched and leveraged against almost \$28 million in volunteer labor contributions to achieving trail maintenance goals on the ground.

The Organizations are deeply troubled that numerous factors have contributed to the recent erosion of the CPW Trails grant program. The trails grant program started almost 30 years ago as a program with grants of about \$1.5 million dollars per year coming from motorized users and volunteer efforts of the users were instrumental in getting the program passed into law and implemented on the ground. Today, this is a program that awards approximately \$7-8 million dollars in grant funding to federal, state and local government agencies and non-profit partners. The overwhelming portion of money from this program is raised from the voluntary registration program that has been developed for the registration of OHVs and snowmobiles and the refund of federal gas tax monies through the Federal Recreational Trails Program. Many of these users who are the primary funding source for the program also partner with the program and volunteer significant time on the ground to make the program the success that it is. Over life of program it has become the national benchmark for what a trails program should be. Last year the Organizations had the privilege to award Tom Metsa NOHVCC Program administrator of the year award at the trails committee meeting in Salida. This year the CPW trails program was nominated as the program of the year by the Coalition of Recreational Trails.

While the funding provided by the program is critical in resolving many management issues, the volunteering and goodwill of the program has become much more valuable than any direct monetary grants. Research places a value of \$28 million annually volunteered to support the program. The Organizations submit this is a low estimate and the true value of the volunteer efforts leveraging these grants is much higher. The Organizations assert with a high degree of confidence that while trails users are more than willing to volunteer for projects, they are not great at accurately tracking this support. Trails users volunteered for projects because the program works on the ground and effectively maintains the trails we are all so passionate about. These volunteers have consistently leveraged the "on the ground" impacts from the monetary grant funds awarded to produce projects that are consistently providing efforts valued at far more than just the amount of money granted by the program. This leveraging of grants appears to have been forgotten or overlooked in the recent desire to fully account for monetary funding awarded.

The winter grooming program performed in partnership with Colorado Snowmobile Association provides a great example of this leveraging of funds by volunteers. The program funds basic grooming activities and capital equipment purchases at 29 locations throughout state and this program often provides the sole means for the public to access federal lands in the winter, making this program an integral part of the Colorado backcountry winter recreational experience. Without volunteers the Organizations have to wonder if grooming could be provided at 10 of these locations with the money from the grant program. Volunteers drive groomers for thousands of miles a year often at night in poor weather conditions. When the groomers break it is the same volunteers that are often in the middle of no place laying in the

snow fixing the broken equipment so it can continue grooming. These are jobs that would be difficult to fill under any circumstances but we have volunteers doing it because they believe in the program. Often these same volunteer raise significant additional funding for grooming operations to supplement money from the state program, which is never enough to maintain equipment and cover operational expenses. This type of support is critical to the grooming program as grooming equipment needs to be fixed and moving even if there is not money in the bank account to cover those costs. Volunteers simply go raise necessary funding.

Strength of the funding portion of the program was **consistent** funding in times of rapidly diminishing federal budgets. This funding was available in a **timely** manner relative to the projects. The program always had **minimal administrative burdens** to insure that funds actually went to trails and were not lost in administration of the program and flexibility was accorded program managers to work with volunteers. This **flexibility** was critical as many of the projects are highly time sensitive and weather dependant. This flexibility also made people want to support the projects and made the project such a success. These are exactly the areas were recent changes in administration have eroded these programmatic strengths.

Recent delays in funding and increasing administrative responsibilities associated with the program have had serious impacts on the program and the Organizations are concerned that the desire to track every penny in the program in a manner similar to the way the state would account for road building will have a massive negative impact on the program overall. When the snow flies the grooming equipment needs to move. When the snow melts the good management crews need to be out on the ground cutting trees off trails. Last year good management crews not funded at all and money for the purchase of new winter grooming equipment was not received by clubs until the grooming season was almost over. Over the several years previous, grant funding had slowly gotten later and later each year until for many it simply never came last year.

While a new standard or documentation requirement in the grant process may only take a few minutes to implement or require checking a box on form or budget, the Organizations are concerned that there has not been a review of the cumulative weight that years of new standards or requirements is having on the volunteers who make the program work on the ground. It has always been assumed the volunteers will simply make it work. The Organizations are concerned that the requirements for a grant are becoming so heavy and the process so slow that volunteers simply cannot make it work anymore. The Organizations are aware that fixing the negative impacts to volunteer support when a standard does not work or administrative burdens too high, may take years and result in far more damage to the volunteer support for the program than the benefit that ever could be achieved from the direct grant. While we are good at finding volunteers for fixing trails the volunteer support for completing a

lot of paperwork after the project was completed has become increasingly difficult to raise. As a result of the lack of flexibility in the program volunteers have already started to walk away in frustration.

Currently, COHVCO has two grants being processed that have been impacted by many of these delays in funding getting on the ground or to the project. We simply passed on doing our annual COHVCO workshop two years ago due to delays in reimbursements for previous years events. The money was simply not there to bridge the gaps in the funding streams. We have concerns that if the funding issues for this year's workshop are not quickly resolved we will not be able to have the event at all. It is tough to make plans for the event or organize volunteers if the event host cannot confirm the event is going to occur.

The COHVCO economic contribution grant has also run into many delays and hurdles, such as needing proof of motor vehicle insurance for a project that will be almost completely completed on line. We have also had to address questions from those above the trails program staff regarding if our grant was fair and reasonable for the state and resolve attempts to completely restructure the grant budget after it has been approved by the OHV subcommittee, this committee, the CPW commission and the Colorado Legislature as part of the long bill. The administrators above the trails staff seemed completely unaware that if we fulfilled their request by trails program regulation we would have to get approval of all the committees again. As a result we are still waiting for our first advance of funds. To further complicate the grant , we have recently learned that our contact person with our contractor has moved on to other employment. While the Organizations are sure we will resolve this issue, these are the types of burdens that fall to volunteers because of funding delays or additional grant requirements. These are the types of issues that must be resolved to make the grant work. Volunteers have historically been there to fill this role but again the Organizations are concerned that volunteers may not be there in the future.

The Organizations concerns about the erosion of the trails program effectiveness impacting volunteer support are not unfounded. Recent issues with the Rout Powder Riders (RPR) Snowmobile Club, which has provided winter grooming services under contract with the Hahns Peak Bears Ears Ranger District on one of the top ten snowmobile destinations in the western united states for more than 30 years provides a concrete example of these impacts. RPR won a grant to replace their aging grooming equipment in 2012 from the winter grooming grant program and vigorously moved forward with that grant to insure that new equipment could be in place to comply with contractual obligations. Unfortunately, RPR was not aware that funding from the CPW grant program would be later than it ever has been before and the club would not receive any money until the end of March despite contractual obligations and the grooming season starting in November of the prior year. While the clubs efforts were not

perfect in many facets of the accounting process, these efforts were critical in insuring grooming would occur that year and saved the CPW program literally tens of thousands of dollars. Even with these savings the club was able to provide exactly the piece of equipment that was sought in the grant in a timely manner and insure that the equipment was going to be in place to benefit the public for many years to come. Despite these clear benefits and the long history of partnership between RPR and the CPW grooming program, no resolution could be achieved on these accounting issues and delays in grant funding, forcing the sale of the grooming equipment by RPR that they had just acquired and put thousands of dollars of repair costs into. The Organizations are aware that efforts for a perfect accounting of the RPR grant may have looked good on paper, these efforts have had catastrophic impacts on the volunteers with the club as often questions in the accounting were difficult and accusatory and RPR voted to cease being a grooming club next year. These types of situations simply must be avoided at all costs.

For the Organizations, there is a foundational question regarding the model for the CPW grant program moving forward. Do we want to continue with the volunteer program that has funding resources, which has proven to be hugely successful over the last three decades or do we want the grant program to become a small funding source with no volunteer support and a heavy administrative burden? The Organizations think we should stay with the program model that has a proven winning track record and has been nationally recognized as the model for how a program should run. The Organizations have to admit that the basis of this situation with the grant program is unclear. The Organizations can confirm that if we are given the opportunity to partner with CPW to fix the problems that have recently manifested impacts to continue the grant program in its current form, we will do so. We are asking that the opportunity to fix the existing program be provided and we need your help in that request and insure that protections are in place in the strategic planning process to insure that similar issues do not recur in the future in any part of CPW activities.

3. Conclusion.

The Organizations submit that the strategic planning process provides the opportunity for CPW to refocus programmatic resources to insure that the intent of the trails program is carried forward in compliance with statutory requirements of merger legislation. The Organizations also believe that refocusing resources will allow trails to be reflected as a critical component of all recreational activity in Colorado. While the Organizations are aware that some issues, such as changes in accounting systems, may not be related to the merger or strategic plans, the merger has not streamlined resolving these issues. The Organizations submit that identification of these types of systemic problems is critical is resolving them permanently. The Organizations vigorously assert that a refocusing of resources will insure that the recent erosion

of the trails program effectiveness is rapidly counteracted and further negative impacts to the volunteer support is avoided. While the \$7 million per year the CPW grant program provides in direct funding is important, the Organizations believe it is the \$28 million in volunteer efforts that partner in the application of this funding to on the ground projects is more valuable to maintaining the high quality recreational opportunities and services to the public that has made the CPW trails program a model for trail programs nationwide.

Please feel free to contact Scott Jones, Esq at 518-281-5810 or via email at scott.jones46@yahoo.com or via USPS at 508 Ashford Drive, Longmont, Colorado 80504 for further discussions about these comments.

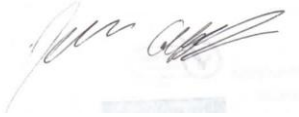
Sincerely,



Scott Jones, Esq.
COHVCO & TPA Authorized Representative
CSA Vice President



D.E. Riggle
Director of Operations
Trails Preservation Alliance



Jerry Abboud
COHVCO Executive Director



Randall Miller- President
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