



August 13, 2019

USFS Hahns Peak Bears Ears Ranger
District Att: Mad Rabbit Trails Project
925 Weiss Road
Steamboat Springs, CO 80487

Re: Revised Mad Rabbit Proposal

Dear Ms. Humphries;

Please accept this correspondence as the continued opposition of the above Organizations to the revised Mad Rabbit Project. While the revised proposal does reduce conflicts within the specific scope of the project, such as wildlife habitat concerns, the revision also fails to address many of the larger scale issues that have come to face both the project and Steamboat Basin. Many of these concerns were raised at the 2014 Trails Charrette but appear to continue to languish as lower priority issues on the HPBE. As we discussed in great detail in our previous comments, it is these larger scale issues that are weighing against the Mad Rabbit Proposal, and in our opinion many of these challenges have gotten worse, not better, since the release of the original Mad Rabbit planning documents. The Organizations submit that existing opportunities and challenges must be addressed at some level before the large scale expansion of any new trail networks. While the motorized community may have been the first to step up to assist in basic operation and maintenance of recreational facilities for all users, we never agreed to be the only community to accept this challenge.

The scale of expansion of mountain bike only trails over the period of declining quality of the motorized partnership is significant. Since May of 2016, HPBE has authorized almost 50 miles of new mountain bike trail on Buffalo Pass and now another 50 miles on Rabbit Ears Pass. In addition to the declining partnerships, over this same time, similar expansions of multiple use opportunities have simply not maintained any semblance of parity as multiple use opportunities account for approximately 15% of these opportunities, despite these multiple use opportunities being available to all users seeking recreational opportunities in the area. Basic questions and concerns on HPBE, such as declining funding for maintenance being asked to maintain for larger and larger visitation to the HPBE area or deterioration of existing partnerships, continue to be avoided. What message does this send to the user groups that

have partnered with HPBE for decades? We are not sure of the exact message but can state is it not positive or that the direct funding flowing from these partnerships is valuable. Walking away from significant dedicated funding for trail maintenance that benefits all users in the hope of a new smaller funding stream that only desires to benefit a single group makes little sense.

Loss of Good Management Crew status.

An example of our larger scale concerns around the declining partnership with the motorized community would be the loss of the “Good Management Crew” status for the OHV Crew on the HPBE funded in partnership with the CPW OHV program. This crew was specifically developed to address basic operational needs generally involving maintenance of motorized trails on an ongoing basis. The Organizations submit that this long range maintenance question is a critical component of the success of any trail network and must be resolved prior to any trail expansion. While the motorized community may have been the first community to step up with this type of funding, we also never agreed to be the only group to step up to maintain access. While we are aware the City of Steamboat Springs is developing a fund for trail maintenance, we are also aware that is program is far from developed and simply does not provide sufficient funding to maintain non-motorized trails in the Steamboat Valley. Building trails with the hope that this type of funding will come at some point in the future makes little sense and could generally be seen as putting the cart before the horse.

The long term history of the Good Management Crew warrants discussion. Under the CPW OHV program any crew has to perform satisfactorily for its three initial years in the competitive portion of the OHV program and then they are moved to a good management portion of the program that allows for prioritized funding from the Program and significantly reduced paperwork requirements for the Crew. This is structured to allow for more boots on ground from the crews and hopefully allowed trained staff to return more easily. Over the more than 20 years of the Good Management Crew program, it has grown from a single crew to more than 24 crews throughout the state and once crews have obtained their good management status, managers see the value in this partnership and work hard to insure the program is functioning correctly and the trail maintenance from this program is often identified as a huge portion of most districts funding for basic operation of their recreation programs.

Prior to the HPBE being the first crew in the state to lose their good management status, **no** other crews were ever removed from the good management portion of the program. This is a program being in place for more than 20 years and now funding 24 crews. When this status was at risk of revocation, that issue was immediately fixed on other districts. This almost \$100,000 per year funding stream from the good management portion of the OHV program

has been in place for almost 20 years on the HPBE, but the HPBE recently lost its good management status for the crew and was forced to obtain funding from the competitive side of the OHV program. This is a dubious distinction at best and should not have been overlooked in favor of expanding any opportunities on the HPBE. The decline of crew performance, failure to provide basic documentation to CPW relative to the grant in anything close to a timely manner and are many of the factors that contributed to the loss of the “good management” status for the crew. These basic performance concerns were simmering at the time the Mad Rabbit project was released, and assertions were made the good Management Crew issues were a priority for correction on the District. Rather than being corrected, these basic issues have continued to decline and have resulted in the loss of that status.

In response to the maintenance crew losing its status and being put in the competitive side for funding, USFS asked local clubs to support their efforts to get a competitive grant. Despite the growing rift between users, CPW and HPBE over crew performance and grant documentation, users rallied to USFS support for their competitive grants, based on assertions that this year would be different and things would be better. This support entailed partners driving to Denver and spending a day to testify their support for the HPBE crew despite declining performance to these users peers. Despite this personal commitment from the users, corrections do not appear to be prioritized as many of the basic issues that have plagued the HPBE GM crew continue forward this year. If basic issues such as this cannot be resolved with current administrative burdens, how will they ever be resolved when the district is now trying to construct extensive new trails networks that lack dedicated funding. The outlook would appear to be even grimmer than the current situation and that is simply not acceptable to the Organizations.

Unfortunately, the loss of the good management crew status is not an isolated issue in the existing partnership between the Organizations and their local members and HPBE. Other projects such as recent grants for landscape level planning have been problematic in performance of contracted duties as well. These types of issues are simply too frequent to be overlooked and clearly will not be resolved if there are expansions of any trails.

User conflicts have exploded in Steamboat Valley and beyond and Mad Rabbit is often identified as an example of this conflict.

A second concern would be the explosion of user conflicts in the Steamboat Valley, much of which seems to be centered on the Mad Rabbit Proposal, but is certainly not limited to just the proposal area or Steamboat Valley. Over the life of the partnership between the OHV

community and USFS, the Organizations have always found the Steamboat area to be a community where user conflicts were at much lower levels than other parts of the state and when issues arose they could be worked through. That simply is not the case anymore as Steamboat would now make a top five list of user conflict hotbeds in the state. Unfortunately these lists are easy to get onto and difficult to remove an area from as once there is conflict, the remnants of that conflict and distrust simply linger for extended periods of time.

While the Organizations are aware the HPBE staff probably hears a large amount of input on this issue on a daily basis from a local perspective, the Organizations would like to clarify that projects like Mad Rabbit are now consistently identified as examples of why successful programs, like the CPW OHV program, need significant revision to insure wildlife and recreational interests are properly balanced. Given that the success of the CPW OHV program in balancing these issues has been recognized for decades and even by conservation interests, we must oppose the project, given the conflicts that we now must deal with outside the Steamboat Valley.

Conclusion.

The Organizations must voice their continued opposition to the revised Mad Rabbit Project. While the revised proposal does reduce conflicts within the specific scope of the project, such as wildlife habitat concerns, the revision also fails to address many of the larger scale issues that have come to face both the project and Steamboat Basin. As we discussed in great detail in our previous comments, it is these larger scale issues like how are existing opportunities maintained that are weighing against the Mad Rabbit Proposal. In our opinion many of these challenges have gotten worse, not better, since the release of the original Mad Rabbit planning documents. The Organizations submit that existing opportunities and challenges must be addressed at some level before the large scale expansion of any new trail networks.

Please feel free to contact Scott Jones, Esq. if you should wish to discuss any of the issues that have been raised in these comments further. His contact information is Scott Jones, Esq., 508 Ashford Drive, Longmont Colorado 80504; phone 518-281-5810; email Scott.jones46@yahoo.com

Respectfully Submitted,



Scott Jones, Esq.
COHVCO/TPA Authorized Representative

D.E. Riggle
Director of Operations
Trails Preservation Alliance