



July 21, 2015

Governor John Hickenlooper  
Office of the Governor  
200 E. Colfax Ave #136  
Denver, Colorado 80203

Re: Trails Program and Outdoor Summit

Dear Governor Hickenlooper:

Please accept this correspondence as the input from the motorized recreational community who was not invited to the recent Outdoor Summit hosted by Great Outdoors Colorado where you rolled out the Beautiful to Pedals program along with your desire to identify 16 trails of priority importance for construction and an interactive state trails map. Frustrating as motorized community came together more than 4 decades to support trails in the state and have developed a self tax program that has placed almost \$100 million dollars on the ground for the benefit of trails in the State of Colorado. The motorized community is the only group that directly pays to support trails in the State of Colorado.

The Organizations noted above applaud your Office for recognizing the integral part that the dispersed road and trail network plays in providing the high quality recreational opportunities that have become synonymous with the State of Colorado. As Colorado Parks and Wildlife ("CPW") has accurately noted 98% of Coloradans participate in trails based recreation and this results in more than 250 million visitor days to the State. Preserving these opportunities was the reason that our user groups came together almost four decades ago, lobbied the Colorado

General Assembly and voluntarily adopted the registration program for motorized recreational trails and management. Our members are intensely proud of the State Trails Program that has resulted and the critical role the motorized registration program has played in providing recreational opportunities in Colorado. Unfortunately, the CPW Trails Program is at a crossroads. The Organizations will need your assistance in resolving the issues that have brought the program to this point and resolve this must be the highest priority for trails in the state moving forward. Our members are very concerned and frustrated that there has been a great deal of activity surrounding trails recently and unfortunately no one has had the courtesy of extending an invitation or sought input from the Trails Committee on many of these questions.

Prior to moving deeper into this discussion, a brief summary of each Organization is needed. COHVCO is a grassroots advocacy organization of representing the 150,000 owners of registered OHVs and thousands of four wheel drive enthusiasts in Colorado. COHVCO is seeking 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.

CSA was founded in 1970 to unite the more than 30,000 winter motorized recreationists across the state to enjoy their passion. CSA has also become the voice of organized snowmobiling seeking to advance, promote and preserve the sport of snowmobiling through work with Federal and state land management agencies and local, state and federal legislators telling the truth about our sport.

Trail Preservation Alliance 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 Organizations act 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. Throughout these comments CSA, COHVCO, and TPA will be collectively referred to as "The Organizations".

**1. There is a critical need to leverage existing resources in order to address all trails based recreation issues.**

While the Organizations applaud the efforts made at the Outdoor Summit, we must also express frustration at the limited input, recreational interests and outreach in identifying routes that benefit only small user groups as a state level priority issues. It is the Organizations

position that while a single trail or connector might be important at the local level, many of the challenges to trails usage in the State are landscape level issues that can only be addressed with programmatic adjustments and partnerships of users. The Organizations found it highly exasperating that 22 miles of bicycle route on the Front Range needed to complete the Front Range Trail was identified as a priority for the State. Over the same period as the Front Range Trail has been developed, literally thousands of miles of true multiple use routes on federal lands were lost to recreational usage on the Western Slope of Colorado. Our Organizations are also aware that the 14ers are in exceptionally bad shape in terms of maintenance, but we would note that the vast majority of recreational users in Colorado will not seek to summit each of the 14ers and often will seek less strenuous recreational pursuits. The Organizations submit that any attempt to reconcile these 22 miles of bicycle routes and limited funding for 14ers maintenance would simply lack factual basis to establish them as a state priority and would not be well received on the Western Slope, which has seen a massive constriction in the multiple use routes available to the public on BLM lands, such as Grand Junction FO, CRVFO and others. Given the limited funds and massive challenges facing multiple use trails, a cost benefit analysis for any project or priority is critical.

The Organizations also would note that developing an interactive recreational map for the State is a commendable goal as well. Our concern is that this resource already exists in the form of the Stay the Trail program's OHV opportunities map<sup>1</sup>, which allows users to identify trails areas, the types of usage at each area and then provides a link to the particular land management agency for the area in order for the public to obtain an up-to-date map of the particular roads and trails in that area. The Stay the Trail program, which is the OHV education and outreach specialists funded entirely by the OHV program. The Stay the Trail program that has been under development for a long time and continues to expand resources available to the public through their maps, educational materials and website. The Organizations submit that failing to include these resources in the development of any statewide recreation map is unfortunate, represents a missed opportunity that could have benefitted all trails and recreational users of public lands, and could result in significantly increased costs to the state in achieving these goals.

The Organizations are deeply concerned that the limited scope of users at the GOCO Outdoor Summit has resulted in missed opportunity for fostering partnerships and this missed opportunity has made these partnerships more difficult to form/expand in the future. While

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<sup>1</sup>This project map and related resources is available here :

[http://staythetrail.org/index.php?option=com\\_k2&view=itemlist&layout=category&task=category&id=4&Itemid=153](http://staythetrail.org/index.php?option=com_k2&view=itemlist&layout=category&task=category&id=4&Itemid=153)

GOCO has had a seat on the State Trails Committee for a long time, not a single State Trails Committee member was invited to the Outdoor Summit despite the State Trails Committee serving as the advisory committee on trails issues for the entire state. Additionally, several of our members serve on the CPW "Partners in the Outdoors Committee", are active members on the team revising the Statewide Comprehensive Outdoor Recreation Plan and are in regular attendance at numerous state and federal land manager meetings. While our members have been actively involved in a wide range of CPW committees and preservation efforts for decades. These efforts were for reasons that are unclear, not acknowledged with an invitation to the Outdoor Summit.

The Organizations believe this narrow cross section of users and failure to involve the State Trails Committee in this discussion clearly evidences the need for better communication between the entire trails community and your office as any program moves forward. The Organizations are also deeply concerned that staff is being hired for the Beautiful and Pedals program, but this staff is in no way integrated with the existing trails program. To make this situation even more exasperating the current trails program is experiencing what can only be summarized as a critical shortage of staffing. As a result we have developed our own list of trails related priorities in the State, including many programmatic issues and challenges, in order to start any discussions with.

**2a. Recognition of the importance of recreational economics to the State.**

The Organizations would like to applaud your Office's recognition of the importance of trails in providing the high quality recreational experience that has become synonymous with Colorado. The outdoor recreational economy is critical to Colorado, as all types of recreational activities contributes more than \$10 billion per year to the State economy. The usage of registered OHV's and snowmobiles in Colorado directly contributes more than \$1 billion per year to the economy and results in more than 10,000 jobs annually. The Organizations are aware that multiple use based trails recreation contributes far more to the economy as many road legal four wheel drives, similar to a Jeep, are not addressed in the COHVCO study and the multiple use routes in Colorado are an integral part of many recreational activities that are only relying on motorized routes to access their chosen recreational areas, such as those wildlife watching, sight-seeing, hunting, fishing and camping.

When these recreational activities, which are heavily relying on multiple use access provided by the existing trails program are addressed, the overwhelming value of this road and trail network becomes apparent. Clearly, the identification of any trails priorities for the State moving forward must include all users of trails and the Organizations were deeply disappointed that obtaining input from all trails users was not achieved at the Outdoor Summit.

**2b. Multiple use routes are critically important to many activities that are not traditionally trail based.**

The Organizations submit that the multiple use basis of trails recreation is as an issue that should be addressed in developing a priority trails management list. As the Outdoor Industry Association has specifically recognized, multiple usage access is critical to providing the recreational opportunities synonymous with Colorado. Similar values have been echoed by many other non-traditional "trails users" as well, which was recently addressed by the National Shooting Sports Foundation("NSSF"). The NSSF in partnership with the US Fish and Wildlife Service and 20 different state wildlife agencies performed a national review of the issues that are impacting the hunting community and declining hunter participation rates in the US and what agencies can do to maintain and grow hunter involvement in the wildlife management process. The NSSF research specifically concluded:

"Difficulty with access to lands for hunting has become not just a point of frustration, but a very real barrier to recruiting and retaining sportsmen. Indeed, access is the *most* important factor associated with hunting participation that is not a time-related or demographic factor—in other words, the most important factor over which agencies and organizations can have an important influence...."<sup>2</sup>

The importance of hunting usage and access for funding of wildlife management activities, a significant issue that is directly related to hunting usage is overwhelming. This funding impact is summarized as follows:

"Hunters are avid conservationists who donate more money to wildlife conservation, per capita, than do non-hunters or the general population as a whole in the United States (Responsive Management/NSSF, 2008a). Hunting license fees and the excise taxes paid on sporting goods and ammunition fund state fish and wildlife agency activities and provide Federal Aid monies.... In fact, sportsmen, as a collective group, remain the single most important funding source for wildlife conservation efforts. Consequently, decreased interest and participation in hunting activities may have the unintended effect of reduced funding for important wildlife and habitat conservation efforts."<sup>3</sup>

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<sup>2</sup> See, National Shooting Sports Foundation; 2011; Issues relate to hunting access in the United States: Final Report; Accessed December 4, 2013; <http://www.nssf.org/PDF/research/HuntingAccessReport2011.pdf> at pg 7. (hereinafter referred to as "NSSF report")

<sup>3</sup> See, NSSF Report at pg 3-4.

The importance of motorized access to the retention of hunters is immediately evident when the specific means of access for hunting activity are identified. Hunters overwhelmingly use motorized vehicles as the primary tools for accessing hunting areas, as cars and trucks are used by 70% of hunters, and OHVs are used by 16% of hunters. The Organizations believe that OHV access plays an even more critical role in Colorado given the difficult and diverse terrain being presented to the hunting community. While 86% of hunters are using motorized tools, only 50% of hunters identified walking as their access method of choice.<sup>4</sup> The significance of closures on public lands is also specifically identified in this research, which identified that 56% of hunters specifically cited restrictions on motorized access and 54% identified closures of public lands by government agencies as significant issues for hunters.<sup>5</sup>

Our Organizations submit that this type of research directly evidences the critical need to obtain input from all trails users in the creation of a priority list of trails issues for the state of Colorado. Again limited funding and basic programmatic challenges warrant a cost benefit analysis for any programs or priorities that are adopted.

### **3a. The funding crisis facing federal land managers and state trails program.**

Our Organizations are intimately aware of the funding challenges that are associated with the dispersed routes/trails network on federal lands in Colorado and firmly believe that partnering of all users is the only way that this issue can truly be addressed. Given the massive nature of the challenge that trails based recreation is facing, even maintaining current opportunities is a goal that may not be attainable. The scale of the federal lands funding crisis was recently addressed by the Government Accountability Office report that identified a maintenance backlog of more than \$314 billion for Forest Service roads and trails and only 20% of all Forest Service routes are financially sustainable.<sup>6</sup> Colorado 14ers recently issued a report regarding the condition of the foot trails to the summit of many of the 14,000 foot peaks in Colorado, that identified that many of the foot trails were in exceptionally poor condition and gave the maintenance efforts a "D" overall.<sup>7</sup> This situation presents a compelling argument that simply maintaining what is currently available to users will require significant efforts and partnerships

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<sup>4</sup> See, NSSF report at pg 56.

<sup>5</sup> See, NSSF report at pg 113.

<sup>6</sup> See, Government Accountability Office; *Forest Service Trails; Long and short term improvements could reduce maintenance backlog and enhance system Sustainability*; June 2013; GAO-13-618

<sup>7</sup> A full copy of this report is available here: <http://www.14ers.org/wp-content/uploads/SustainableTrails-14er-Report-Card-Final-6.9.2015.pdf>

of users with state and federal land managers. Clearly a partnership similar to the one between motorized users should be looked at for foot path issues as well.

The Organizations are aware that the Colorado State Trails Program has grown to a program that puts over \$7 million in annual funding from the motorized user community back on the ground for all trails users. This program fosters volunteer support from the grants as in kind donations of labor that flow from the program, which is valued at more than \$28 million a year. Again, the motorized community is the largest single source of volunteer labor to complete the grant projects. Many of these grants have matches of funding or other resources equal to the value of the grant from third parties. The Organizations commend GOCO for increasing funding for non-motorized opportunities but their efforts are at best a partnership, as the motorized community has been funding trail maintenance for decades before GOCO was formed in 1992.

The Colorado State Trails Program has been consistently recognized as a national leader in maintaining dispersed trail networks and providing the basic resources to land managers to continue to provide trail and road based recreational opportunities to the public. Numerous activities to benefit all recreational activities are funded through the motorized component of the Trails Program including:

1. Directly funding 16 good management crews throughout the state that provide basic trails related services such as maintenance, trash removal and cutting of dead beetle kill trees that consistently block trails to all users; and
2. The winter groomed trail network provides almost all public access to winter backcountry recreational opportunities including cross-country skiing and hybrid skiing.

We have enclosed a summary of each of the 32 summer grants in 2015 from the Colorado Trails Program to predominately federal land managers and outlines of the good management crews that accounted for more than half the grant money awarded by the program. Each of these grants represents a large benefit to all trails users. The Organizations also vigorously assert that the motorized community has directly contributed more than \$300,000 per year to non-motorized trails through the Federal Recreational Trails Program. The Organizations would welcome the types of partnerships that protect and preserve multiple use trails and the Trails Program that could be facilitated by your Office. It is highly frustrating to the Organizations that the is Program was not involved in the Outdoor Summit in order to insure that basic services associated with all trails usage are addressed and it appears that staffing decisions are now

being made entirely outside the established trails program, while the critical lack of staffing at the Program is entirely overlooked.

**3b. The CPW Trails Program is at a critical crossroads.**

Our Organizations believe that building a complete inventory of goals and objectives for trails as part of the Outdoor Summit is a valuable objective and that the failure to obtain a full cross-section of all trails related issues has resulted in basic issues being overlooked. The primary issue that could have been addressed at the Outdoor Summit would have been the challenges with the existing State Trails Program and hopefully how to resolve these issues in a timely manner. Given the importance of this issue, our Organizations believe this warrants particular examples of why we are concerned.

The Organizations submit that the State Trails Program is the single most effective tool available in the nation for preserving multiple use trails and high quality recreational opportunities on public lands in Colorado. While this Program has been highly effective in the maintaining of tens of thousands of miles of routes in the past, it is the Organizations experience that the Program has become heavily burdened with unnecessary documentation and multiple layers of review often by persons totally unfamiliar with the Program. This has resulted in increasing burdens on grant recipients, significant delays in funding projects and many other issues that directly impair the effectiveness of the program on the ground for all users. In our opinion, the managers that built this Program from the ground up are forced to answer to CPW, DNR and other Comptroller representatives that simply don't understand the objectives and may have only recently graduated college. While there are efforts in place to attempt to resolve these issues, our Organizations are deeply concerned that if efforts are too late changes will only be of limited benefit and may not stop loss of the State Trails Program entirely.

The State Trails Committee had recently received testimony from more than a dozen grant recipients on the new hurdles the State Trails Program is facing. A complete version of these meeting minutes are attached to this correspondence. However, the Organizations wanted to specifically highlight some of these concerns including:

- 1) The complete failure of the Trails Program to fund both USFS and BLM good management crews last season allegedly resulting from paperwork issues between the BLM and CPW;
- 2) New holdback requirements for the final 10% of any grant, requiring small non-profits to either find additional funding or never submit the grant;

- 3) Many of the volunteer clubs that qualified for funding to purchase winter grooming equipment in the 2014/2015 season did not receive any money until the end of the grooming season; and
- 4) Reimbursement of operational activities under grant awards was consistently received very late.

While these issues were immediately understood to be critically important by the State Trails Committee, the Organizations are concerned that this position has not been adopted by others in CPW as it took almost 6 weeks to get an appointment to speak with the CPW Director and when the CPW Commission was addressed some members understood the issue and others displayed sentiments about these issues similar to "as long as the money gets to them at some point that is good enough" were displayed. This is very concerning. These are issues that the State Trails Committee and our Organizations remains committed to resolving, but could have been resolved more easily with the support of your Office and the pulpit that the Outdoor Summit could have provided. Clearly insuring the continued effectiveness of the State Trails Program is a top 16 trails priorities for the state. Given the scope of the challenge, partnering of users and resources will be a critical step in truly resolving these issues, but will need the full cooperation of CPW, DNR and the Outdoor Summit.

#### **5. Partnerships are the only way to address trails challenges.**

The Organizations are upset that such a narrow vision and invitation list was relied on for the development of the Outdoor Summit, especially since GOCO has had a seat on the Colorado State Trails Committee for decades. It was our Organizations understanding that this seat on the State Trails Committee was provided in order to facilitate communication between users and avoid issues such as those that have resulted from the Outdoor Summit.

It has been our Organizations experience that too often a narrow vision of a trails based management objective addressing only a single user group becomes a hurdle to improving recreation on the ground rather than a benefit and often results in a barrier between partnerships. An example of this conflict outside the Trails program would be the recent reallocation of lodging taxes to trails by the City of Steamboat Springs. Rather than leveraging existing resources in the area, the mountain bike community allocated the revenue entirely to mountain biking and then developed a system of mountain bike only trails in the area, which resulted in expanded conflict between users rather than improved recreational opportunities. This type of single minded proposal has been a frustrating situation for all trails users and simply must be avoided in the future.

Unfortunately, the Steamboat Springs area is not the only area where single interest groups place themselves above multiple use interests. Other examples would be unilateral decisions from the mountain bike community that fat tire bicycles should be allowed on all groomed winter routes on the White River National Forest despite the prohibition of this usage in the Forest Plan. Another example is the loss multiple usage to mountain bike only usage on the trail known as the world's greatest downhill trail on BLM lands outside Eagle, despite the decades of usage and maintenance of this route by the multiple use community. These are issues that compound frustrations to our users from the limited scope of the Outdoor Summit.

Again, the Organizations submit that the Outdoor Summit could have been a prime opportunity to build these partnerships, resolve current issues facing trails, and for reasons that remain unclear was not relied on to function in that role. The Organizations would welcome any efforts from your Office to build these partnerships to protect and preserve trails in Colorado in the future.

**6. Our Organization's top trails to be reopened/preserved and trails related issues to be addressed (in no particular order).**

The Organizations are very concerned regarding the accuracy of any list of high value trails and issues that might have been compiled at the Outdoor Summit due to the limited scope of users invited to the event. As an example, the Organizations are aware that approximately 5,000 miles of multiple use routes have been closed in recent planning efforts from several BLM Field Offices in western Colorado and these closures have been of serious concerns for local communities and have been vigorously opposed by the Organizations. These areas have become primary recreation areas for the residents of the Front Range due to limited opportunities being provided on the Front Range.

The Organizations are also deeply concerned that there are many programmatic issues and landscape level concerns regarding trails that are simply never addressed and are far more important to the state than any single mile of route ever could be. Examples of these landscape level concerns would include the challenges facing the state trails program but would also include the ever shrinking funding for recreational trails from the federal government.

The Organizations submit that any assertion of 22 miles of bicycle trail on the Front Range to connect Wyoming and New Mexico is a top 16 priority in the State is probably lacking factual basis in light of thousands of miles of routes being lost in other parts of the State. Such a position is even more difficult to defend when the limited number of user groups that would have access to this route is identified. Clearly these 22 miles of routes is of limited value for a hunter seeking to retrieve big game on the Western Slope.

As a result, the Organizations have identified 16 of our own multiple use trail network locations and trails related issues to be addressed in the attached list to this correspondence. We welcome discussion and efforts to develop a consolidated list of the 16 priority trails issues in the State and any efforts to partner with existing motorized programs and resources to mitigate these issues.

## **7. Conclusion.**

The Organizations commend your Office for recognizing the importance of the multiple use trails/roads network to all recreational activities in the State of Colorado, although we have experienced significant frustration with these efforts to date. The Organizations would welcome any collaborative efforts to address trail challenges and as a result we have included our 16 priority issues for the existing trails network in the State of Colorado. While time is growing shorter and the urgency is increasing, our Organizations believe immediate partnerships with the Outdoor Summit can resolve these issues. The Organizations believe that rather than identifying small trails for the benefit of a single user group, any trails based efforts must be collaborative and targeting how the most benefit can be obtained for all recreational users. There are many landscape level programmatic challenges facing trails in the State and we would be remiss in not addressing these issues. The Organizations submit that resolving the crossroads currently facing the CPW trails program would be the single largest step that could be taken to protect multiple use trails in the state. Obtaining a wide range of input is also key to improving trails based recreation as this will allow for complete leveraging of resources and partners that are already on the ground as a result of decades of work that has already occurred under the CPW trails program.

The Organizations would ask that they be invited to any Outdoor Summit type events that might be formed in the future and would be more than willing to participate in the formation of a priority list of issues impacting trails users in the state. Please feel free to contact Scott Jones at 518-281-5810 or by mail at 508 Ashford Drive, Longmont, CO 80504 for copies of any documentation that is relied on in these comments or if you should wish to discuss any of the concerns raised in this correspondence further.

Respectfully Submitted,



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CSA President  
COHVCO, TPA Authorized Representative



D.E. Riggle  
Director of Operations  
Trails Preservation Alliance



Jerry Abboud  
COHVCO Executive Director

CC: Lt. Governor Joe Garcia  
Luis Benitez, Colorado Outdoor Recreation Industry Office  
GOCO Executive Director  
Al White, Colorado Tourism  
Mike King, DNR Director,  
Bob Broschied, CPW Director  
CPW Trails Committee Chair Christian Meyer  
CPW Trails John Marriott  
CPW Trails Janelle Kukuk  
USFS Region 2- Jim Bidwell  
BLM Colorado State Office- Jack Palicchi  
CPW Trails Program

## Top trails related issues in the State of Colorado

### 1. Existing trails program must be protected in order to insure continued exceptional performance of program;

- Predominately funded through the voluntary registration program adopted by the OHV and snowmobile community decades ago;
- National award winning program that funds cutting trees; picking up trash; providing basic services
- law enforcement and backcountry safety
- allows flexibility in USFS and BLM funding for trails
- grants have become exceptionally slow in payment and often associated with higher and higher administrative burdens on volunteers and land managers

### 2. Legislation regarding recreational OHV usage on county roads;

### 3. Lefthand Canyon Area in Boulder County must be reopened;

- true multiple use area that has recently completed planning and has been closed since Front Range Flooding
- USFS is now asserting that entirely new planning must be undertaken.

### 4. Rollins Pass Road must be reopened

- route connects Winter Park and Boulder and was specifically addressed in James Peak Wilderness Legislation;
- unique recreational opportunity for all users; and
- massive community support other than Boulder County Commissioners.

### 5. Captain Jacks Trail network outside Colorado Springs must be reopened;

- Temporary closure due to ESA litigation

### 6. The complete lack of quality parking facilities throughout the state for trailheads;

### 7. DeBeque single track trails outside Grand Junction should not be closed;

- exceptionally high quality single track recreational area that is proposed to be closed;

### 8. BLM RMP's- in the last several years the BLM has literally closed thousands of miles of high quality multiple use routes without opposition from the State of Colorado;

### 9. Pueblo Honor Farm;

### 10. Impacts of Endangered Species Act listings

- too often trail closures are relied on to address species issues that are completely unrelated to recreational usage
- We appreciate your lead on the Sage Grouse but there are many other species that have had huge impacts on recreational access such as the cutthroat trout and lynx;

### 11. Multiple use recreational opportunities are exceptionally limited or totally unavailable within 2 hours of the Front Range;

**12. Build a coalition of trails users that seek to work together on issues rather than each organization seeking to build exclusive trails;**

**13. Restoration of trails in fire impacted areas;**

**14. Front Range Flooding impacts must be addressed;**

**15. Declining funding for non-motorized recreation and trails.**

- ongoing concern for Federal Recreational Trails Program
- declining Land And Water Conservation Fund monies

**16. Develop truly multiple use trail network in the Steamboat Springs area.**

- leverages existing funding from City of Steamboat Springs