



April 21, 2017

Jake Houston, Local Government Program Manager
Great Outdoors Colorado
1900 Grant Street, Suite 725
Denver CO 80203
electronically submitted at jhouston@goco.org

Re: Palisade Plunge Grant Application

Dear Mr. Houston:

Please accept this correspondence as the comments of the Trail Preservation Alliance in opposition to the Palisade Plunge Grant Application from the Town of Palisade ("the Proposal"). The TPA is contacting you directly as it is unclear how to publicly comment on grant proposal to GOCO through the website. TPA would also be very interested in copies of any additional documentation that might be related to the grant proposal moving forward and any assistance you can provide on this issue would be greatly appreciated.

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. The Colorado Off-Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization of approximately 2,500 members 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. For purposes of this correspondence COHVCO and TPA are referred to as "the Organizations".

The Organizations are contacting you to express serious concerns regarding the Proposal's basic need, limited target audience and costs despite the project being identified as one of "The 16." The Organizations are concerned that there are several routes currently in the Palisade area that are already available and the Organizations believe these resources could simply be advertised to users in order to expand basic awareness for these opportunities. Often the lack of awareness of the opportunity is a major hurdle to utilization of resources on the Western Slope of Colorado.

The Organizations submit that issues such as the basic need for the project must be addressed in subsequent NEPA for the project, as there are many resource concerns in the proposal area which must be properly addressed with land managers. This must be a vigorous and complete process. The Organizations also believe that the narrow scope of target audience and high cost warrant a complete assessment of the project to insure the project is basically viable.

The Organizations must also express serious concern about the highly technical nature and remote location of the Proposal in relation to most users. The Proposal provides for a trail that starts at 10,000 ft and drops more than 6,000 ft over 25 miles of new trail, which results in a trail that has minimal benefit to all other user groups and can only be used by the most advanced and skilled in the mountain bike community. Most of the public is unable to ride a bicycle at 10,000 ft for any distance, even under basic riding conditions. Given the funding challenges that are faced in providing basic recreational opportunities to much larger user groups in areas with much higher visitation, the Organizations must submit that the almost \$2 million in grant funding could be used to protect existing opportunities for a much larger portion of the recreational community.

The Organizations are also concerned about the significant costs associated with the project, almost \$1.5 million dollars. Over 80% of all trail miles in Colorado are located on Federal Public lands and the funding situation with federal lands managers has significantly deteriorated in the last several years, as exemplified by the more than \$188 million in budget cuts absorbed by the US Forest Service last year and the proposed further 25% reduction that has been proposed for this year. These are major challenges to the continued viability of trails on federal public lands as the recreational programs have already been cut to the bone. Currently the State of Colorado provides less than \$50,000 dollars to federal land managers for maintenance for non-motorized recreational routes on public lands. The current network is probably not economically sustainable making a basic cost benefit analysis for any funding a critical analysis moving forward. The Organizations submit that any dedicated user group type trail proposal fails a cost benefit analysis, and that maximizing the cost benefit analysis for all users must be considered. The Organizations submit that the almost \$1.5 million dollars requested could be

more effectively used to maintain current opportunities and expand the painfully small amount of support from the state of Colorado to federal land managers for non-motorized opportunities.

The Organizations have extensive experience with trail building and maintenance throughout the state and are aware that even the most perfectly designed trail developed under the conditions similar to the Plunge will need significant ongoing maintenance and often this maintenance can only be cost effectively provided with mechanical equipment. Often this maintenance is needed on an almost ongoing basis as certain soil types perform poorly as a trail surface during or after even a minimal rainfall. The Organizations believe that identifying the long term sustainable of funding for such maintenance is an important part of the grant proposal and long term success of the project. As GOCO funding does not appear to support basic maintenance, the source of secure long term funding for this maintenance must be addressed in the grant proposal and has not been. It has been the Organizations experience that often local government funding is unavailable for projects such as trail maintenance and both the USFS and BLM have exceptionally limited resources for maintenance of non-motorized recreational opportunities. It would be a shame to allocate almost \$2 million in funding to build a trail that could easily be closed in the near future due to the lack of funding to maintain the route.

The Organizations submit that expanding the scope of users allowed on the Plunge would provide a clearly identified source of long term maintenance funding for the trail as both the USFS and BLM have good management maintenance crews that are funded by the CPW OHV program. Expanding the target audience for the trail would allow these teams to maintain the Plunge as under Colorado law these teams are only allowed to maintain motorized routes as they are funded by grants funded by OHV registration moneys. The Organizations also note that while this remote trails is very near the Powderhorn Ski area, and clearly will be a resource to that resort, no funding appears to be provided by the resort to support the project. That is problematic.

The final concern we have is the exceptionally limited target audience for the Proposal. While the cycling community often presents a compelling reason for trail development, these reasons have proven to be overly optimistic. This was recently highlighted by efforts in the City of Denver to convert portions of Broadway into a bicycle only route. **Despite the exceptionally large user group that could benefit from these opportunities, FOX 31 news recently reviewed utilization of the dedicated bike lane under the pilot program and found that the dedicated**

lane was only used by 8 cyclists and one skateboarder all day.¹ Similar low levels of visitation to dedicated mountain bike resources have also been experienced by numerous Colorado ski areas that have developed mountain bike opportunities in the summer.

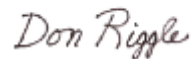
Given the exceptionally limited target audience for the Plunge grant application, the Organizations would be exceptionally surprised if utilization of the Plunge was any higher than usage of the bike lane in downtown Denver. The Organizations respectfully submit that the maximization of any funding provided for outdoor recreation must be the highest priority, given the huge funding reductions experienced by federal land managers in the last two years. Under such a review the Palisade Plunge grant application simply cannot be funded.

The Organizations would welcome a discussion of these opportunities at your convenience. Please feel free to contact Don Riggle at 725 Palomar Lane, Colorado Springs, CO 80906. His phone is (719) 633-8554.

Sincerely,



Jerry Abboud
Executive Director
COHVCO



D.E. Riggle
Director of Operations
Trails Preservation Alliance

¹ <http://kdvr.com/2017/04/14/south-broadway-corridor-to-undergo-further-changes-evaluation/>