



October 15, 2024

Colorado Parks and Wildlife
Att: Jody Kennedy
Via email only

RE: Preliminary Thoughts on Outdoor Strategy

Dear Jody:

The Organizations would like to supplement our original comments on the SCORP and Outdoor Strategy previously submitted July 27, 2024. When our original comments were provided on the SCORP, we had not had the opportunity to review the Outdoor Strategy in any detail. After having the opportunity to review the Outdoor Strategy more completely we can simply say we are disappointed and frustrated with the Draft Outdoor Strategy (“The Proposal”). Our disappointment centers around several general issues including: strategic recreation planning has simply been largely disregarded in the Proposal despite it being a cornerstone of the effort; the Proposal is silent around the huge success Colorado has had in providing sustainable recreational opportunities for decades; many CPW partner groups and their successes and challenges in providing sustainable recreational opportunities simply not mentioned in the Proposal; and often third party information is relied on instead of CPW data. The need to accurately understand and recognize challenges facing Colorado will be critical in crafting an accurate and effective response in furtherance of mandates of EO 2020-008. While we are aware that data we hope will be developed from the effort will be highly valuable to the recreational community moving forward, the first usage of this new data cannot be to correct poorly directed management efforts that resulted from foundational failures in the Proposal. Much of the public and land managers failed to understand that the motorized community has been legally required to balance recreation and conservation on federal public lands since 1972 with the issuance of Executive Order 11644 by Richard Nixon. The Organizations are very concerned that the cumulative impacts of the challenges of the Proposal reliance on imperfect information and failing to recognize the success that has already been achieved will result in poor management decisions.

In several locations the Proposal asserts large concerns for wildlife populations based on public perceptions, such as climate change or growth of state populations. The Organizations don't contest this perception exists in Colorado, as we have been addressing this issue for years in various federal NEPA efforts and had numerous discussions with CPW leadership on this issue. We do not contest that vocal minority of the public appear to have the perception wildlife populations are plummeting and closures are necessary. When these perceptions are compared to CPW data, these public perceptions are immediately identified as less than accurate. These types of conflicts based on incorrect or incomplete information are exactly the type of situation the Outdoor Strategy was designed to address. As a recent example of the challenge that may result from poor data being relied on is the planning effort undertaken on the GMUG NF in 2021, where many in the public asserted wildlife populations on the GMUG were plummeting. When this assertion was compared to CPW herd specific data on the GMUG it was determined that elk populations were 35% above goals and deer populations were only 10% below goal due to recent winter kill situations on the forest. Unfortunately, this example is not the only time we have encountered this issue. Building awareness of this success in conservation and recreation would be a major step towards the goals of EO 2020-008 as repetitious efforts could be avoided and other users could use this model moving forward. Failing to recognize success does not foster future success.

This growingly systemic lack of public awareness and understanding on the current balance in conservation and recreation values forces us to ask a basic management question: "What is the proper management response to the situation?" Is this a situation that needs an on-the-ground management response or is this an issue addressed with an educational effort regarding before any on the ground response is undertaken? This situation highlights our concerns as any management response must include education of the public and not just tighter management restrictions and closures to achieve a goal that may have already been achieved. Accurate information from CPW has been published for years on what these goals for wildlife populations are and challenges in achieving these goals. CPW has consistently stated that recreational activity is often a nonexistent threat to these resources. If there is a desire to change these conclusions on the proper level of any resource, then the public should be educated what the process is and how to engage in the process.

The Proposal simply moves past this critical step, as education is not recognized, and success is not highlighted.

We continue to struggle with understanding how the Proposal is to be coordinated into other planning efforts and are very concerned that the effort will result in minimal benefit to anyone but immense conflicts between users being fostered. Regardless of where the distinction and focus of the SCORP and Outdoor Strategy ultimately falls, recreation must be addressed in the Outdoor Strategy as required in Governor Polis EO 2020-008 and various mission requirements for CPW identified in the Colorado Revised Statutes. We are disappointed that the Proposal fails to even recognize that everyone and everything wins when there is a healthy ecosystem for the public to enjoy. A healthy and vibrant ecosystem is a critical step providing all recreational opportunities, even for those that will only experience these opportunities through a picture on the internet. Building well planned and maintained trails and other infrastructure when they are needed contributes to a healthy ecosystem. This is simply never addressed.

These comments are troubling for us to even write as the Organizations have partnered with CPW for more than 50 years. Over this time there have been good times and less than good times throughout this partnership over this time. Recreation has always been an important component of CPW efforts as many in the State did not pursue consumptive wildlife activities. Recreational opportunities like State Parks have been a critical tool for CPW to engage the public on different issues and this critical tool is simply not addressed at all in the Proposal. CPW has recently led efforts that have been nationally recognized for their groundbreaking collaboration to proactively balance trails and wildlife but are not mentioned in the Proposal. The silence in the Proposal is deafening. The Proposal could be an important step in creating balance for the public and furthering the decades of success in achieving these goals. Educating the public on this success could unify interests in the outdoors and move both conservation and recreation forward. Rather than uniting the communities, the Proposal divides further. For many in the public, CPW has become the agency reintroducing wolves in Colorado despite this effort only being a small portion of what CPW is mandated to do, and has been successfully doing for a long time. The wolf reintroduction has already created numerous unforeseen challenges such as having to relocate packs already and loss of sources for more wolves. We remain concerned that when wolves impact ungulate populations,

motorized recreation and trail usage will be blamed. The Proposal will only expand existing conflicts around recreation and wildlife as the Proposal does not address that well planned and managed recreation will further recreation and conservation. The Proposal should unite interests and move forward with success rather than further divisions and conflict. This type of result simply will not happen as recreation benefits are not mentioned at all.

1(a) The Proposal fails to reflect the balanced agency mission and objectives identified by the Legislature.

This document should be a celebration of success on issues where there is an immense amount of successful planning and effort already in place. The Organizations are very concerned that if this Proposal was provided to someone unfamiliar with CPW, this document would not assist them in understanding the long history of success in Colorado on the issues being addressed or help them to understand challenges that are being faced. It falls well short of that goal despite the overlap of many of the planning documents on both their goals and objectives, which gives the Organizations concerns about how the document would be used in the future.

The erroneous and troubling direction and scope of the Outdoor Strategy is immediately apparent when the statutory mission of CPW is reviewed. Article 9 Title 33 of the Colorado Revised Statutes clearly lays this mission as follows:

“SECTION 1. Legislative declaration. (1) The general assembly hereby finds, determines, and declares that:

- (a) The people of Colorado value and seek to preserve the state's unique park, wildlife, and outdoor recreation heritage;
- (b) Maintenance of a healthy outdoor recreation program is vital to local, regional, and state economies;
- (c) It is important to leverage existing fiscal, personnel, and capital resources to achieve the greatest accountability, efficiency, and customer-focused service delivery possible;

- (d) Combining similar or overlapping programs and functions has the potential to reduce costs, streamline processes, and provide a net benefit to state budgets;
- (e) Coloradans and visitors to the state will benefit from the preservation of important programs, such as the aquatic nuisance species program, the recreational trails program, and the natural areas program, that would otherwise need to be scaled back or eliminated under current budget proposals;
- (f) Policies, procedures, and accounting methods to ensure transparency, to prevent the unauthorized commingling or impermissible use of moneys in distinct funds, and to ensure that moneys are expended consistent with the purposes for which they are received, collected, or appropriated are fundamental to any successful effort to realize efficiencies;
- (g) Preserving the missions of the division of wildlife and division of parks and outdoor recreation is a priority, as is transparency of the process for combining functions, streamlining processes, and reducing costs; and
- (h) The board of parks and outdoor recreation and the wildlife commission have created strategic plans that identify goals and objectives for the division of parks and outdoor recreation and the division of wildlife for the next five to ten years, and combining divisions so that resources are shared and allocated toward the achievement of shared and mutually beneficial goals will further these objectives, including:
 - (I) Protecting, restoring, and enhancing habitats;
 - (II) Providing and protecting opportunities for hunting, fishing, and wildlife-viewing opportunities;
 - (III) Enforcing regulations that protect fish and wildlife;
 - (IV) Increasing public knowledge of agency missions;
 - (V) Increasing public awareness of, and participation in, a variety of outdoor activities;
 - (VI) Attracting and retaining a diverse workforce and promoting excellence within that workforce;
 - (VII) Creating and strengthening outreach and partnerships; and
 - (VIII) Maximizing funding.”¹

¹ See, §1 SB 11-208

It is important to note the CPW has had a statutorily balanced mission since the merger of Division of Wildlife and Parks in 2012. Contrary to much of what we continue to hear in public meetings, this balancing of interests and protection of all values is not a new concept in Colorado but one that CPW has been required to do for more than a decade. While this merger was a huge effort for the Organizations, it is astonishing how quickly this nuance has been lost. Again, this decade of effort working towards balance should be highlighted and celebrated in the Proposal rather than simply overlooked.

A similar balance of interests between recreation and conservation is again highlighted in Governor Polis' EO 2020-008. This EO refined and updated these basic goals in the Statute as follows:

“A. DNR, in consultation with CPW and the CO-OP, shall develop the Initiative to achieve the following goals:

1. Ensure that Colorado's land, water, and wildlife thrive while also providing for equitable and safe access to quality outdoor recreation experiences;
2. Convene voices from different outdoor interests, races, cultures, ages, and sectors through the Regional Partnerships to identify regional priorities and strategies;
3. Collaborate with Regional Partnerships to develop a State-level vision and Plan for conservation and recreation; and
4. Identify stable and long-term funding from multiple, sustainable sources to provide for the critical investments needed to conserve Colorado's landscapes, rivers, wildlife, sensitive habitats, and recreational opportunities.”

The Organizations would be remiss if our concerns around the relationship of the Proposal and the goals and objectives mandated by Colorado Revised Statutes and refined with EO 2020-008 was not addressed. Our concerns expand as the Proposal delves into many topics that are outside the Statutory CPW mission and values. Are these issues important? Absolutely. Should the Proposal seek to align with these other planning resources that specifically address these topics? Absolutely. Should these other planning resources be used instead of CPW resources to address these challenges? Probably. The Organizations would request that the Proposal balance the two overarching goals within their statutory mission and in the EO before adopting a higher level of focus

on more refined topics that CPW may not be well suited to address. At best, this is mission creep for CPW and that is never a good thing.

1(b) CPW needs a balanced message moving forward and the Proposal could be a major step in this direction.

The Organizations had hoped and advocated for this document to be balanced and reflect the strategic multi-faceted roles that CPW is fulfilling. This type of messaging is critical to the long-term success of CPW given the challenges that CPW is facing especially regarding the limited public understanding of CPW operations as a whole. This balanced message is more important due to the public perception that CPW is overly focus on wolves. While Proposition 114 mandated wolf reintroduction, it did not alter the mission of CPW. Prop 114 merely identified CPW as the lead agency for this effort. This change has created significant challenges for the agency that have not gone unnoticed. The challenges that the wolf reintroduction has created for CPW were recently highlighted in a Summit Daily news article addressing the perceived imbalance of CPW efforts and the stress it is placing on the agency as a whole.² While CPW representatives attempted to put a good face on the wolf issue, outlining the balance of CPW efforts in the Proposal would be a significant indication of where CPW is going and the success that CPW has had on these issues beyond wolf reintroduction already. The value of the Proposal only expands when the upcoming reintroduction of the wolverine are undertaken by CPW in the next several years.

While the Proposal could be a major resource for CPW to use in responding to public concerns such as those presented by the wolf and wolverine reintroductions, this opportunity is simply not pursued. The Proposal could provide a balanced message to the public and as a roadmap to address management challenges that are identified. With efforts of these scale and stature, tools and resources such as the Proposal should be identified and fully utilized. This document could easily provide a balanced vision of CPW does wolves, wildlife, recreation and it benefits everyone in the state. The Proposal could also provide guidance on how CPW will work to balance and educate

² <https://www.summitdaily.com/news/colorado-wolf-reintroduction-parks-wildlife-employees/>

the public on the wide range of efforts that CPW has successfully undertaken since the merger. Failing to use this document in this manner is at best a missed opportunity.

1(c) The Proposal highlights existing imbalances in strategic planning resources but does not address how to correct this imbalance.

The impacts of the failure of the Proposal to strategically address recreation in balance with other values is not just limited to CPW ability to respond to wolf and upcoming wolverine management issues. The Organizations welcome that the Proposal highlights the existing imbalance in strategic planning available on the values of recreation and conservation which highlights the critical need for data and strategic planning on recreational issues. Simply recognizing this situation is important so strategic planning for recreation can be undertaken to address the imbalance. The Proposal fails to highlight the need for this resource to be developed and expanded in any of the milestones proposed. The failure of the Proposal to address this type of systemic imbalance in strategic planning values is perplexing given the target of this effort has been to identify imbalances and resolve them.

The Proposal is the first effort we are aware of that identifies the list of statewide conservation or recreation plans, which is provide on page 9 of the Proposal. After a cursory review, it is immediately apparent that the number of recreation plans is simply dwarfed by the number of conservation plans. The Proposal clearly identifies 13 conservation plans and only 8 recreation plans currently in place in the State. The Proposal provides an additional itemized list of statewide conservation and recreation plans on pg. 25 of the Proposal. This chart again highlights the imbalance in existing statewide plans as this chart clearly identifies 27 conservation plans and only 15 recreation plans. While merely counting the number of plans is not dispositive of the issue as plans address many topics and not all plans are created equally, these initial imbalances cannot be overlooked. The imbalance becomes much worse when the nature of the plans is addressed as almost all conservation plans are highly strategic in nature and overwhelmingly the recreation plans are single issue driven plans. The Organizations submit this is a challenge that must be recognized and addressed. Rather than addressing this imbalance, the Proposal carries this highlighted imbalance of existing resources forward into strategic milestones for the effort. After a brief review of these

milestones, it appears only 3 milestones relate to recreation and 10 are related to conservation and another 18 are not directly related to either issue. Again, the Organizations vigorously assert this falls well short of the balance required in the agency mission and also the requirements of EO 2020-008. This must be corrected.

The Proposal does highlight the historical imbalance in planning resources that have been directed towards conservation issues and recreation issues. Even under the most broad interpretation of recreation plans, conservation plans outnumber recreation plans almost 3 to 1 in terms of the number of plans. While recognizing this situation has value, the Organizations submit this situation has been present for an extended period of time even if no one has identified the problem. The Organizations submit at least part of the problem being presented is that Planners simply assumed recreation infrastructure was sufficient in size and types of opportunity provided. This assumption in strategic planning was never confirmed and as a result, in many areas recreational issues lag far behind other issues in strategic planning. The Organizations are aware that the data goals in the SCORP and Proposal will be of significant value in the long term, these long-term goals cannot be the only benefit as these tools will take years to bring on-line.

While the recreational community lacks the data to define objectives and factors impacting access and quality of experience that is available for many other issues, this does not mean recreation planning can be ignored until new data is available. We are aware there are rapidly growing challenges for recreational access in many areas and avoiding these known problems will not resolve them. Creating a plan that undervalues recreation simply because this activity is not as easily defined as other efforts would be a mistake. The recreational community hopes that data developed at some time in the future will not need to be used to return recreational opportunities that were lost as the data was developed. There are challenges facing recreation such as population growth and increases population concentration along the Front Range and ignoring these issues will not make them go away. These are strategic challenges that should be balanced in CPW efforts and messaging moving forward. The Proposal fails to do this entirely.

This itemized list is helpful in identifying how few state recreation plans are currently in place as there are almost twice as many wildlife/climate plans in place when compared to recreation plans.

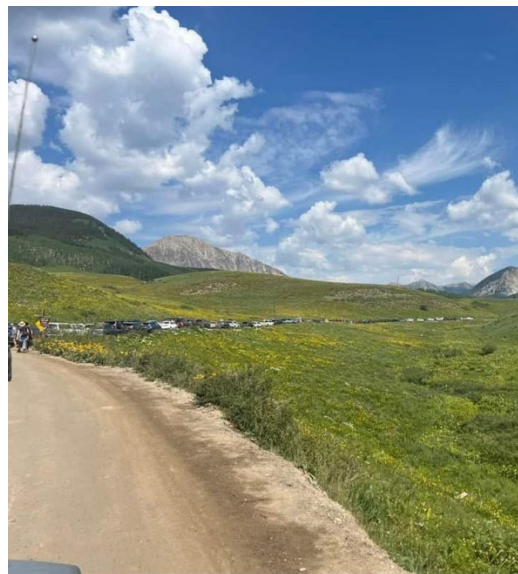
This only compounds our request for balance in the Proposal. Rather than addressing this imbalance, the Proposal appears to contribute to it further as milestones from the Proposal exhibit the same imbalance in values as has been highlighted previously. While the Organizations vigorously support the need for expanded data on recreation, we are also concerned that significant portions of the data being developed is only in the early stages of development. The Proposal estimates some of data collection efforts will not be completed until 2030. We should not wait this long to start to address challenges. Implementation of plans to address this new data development could take years to complete and even more time for planners to understand and implement locally to provide a benefit. Recreation will need to adapt and expand over these years but the Proposal fails to address this issue.

1(d) Strategic recreation plans are different than issue specific recreation management plans.

The strategic nature of the Proposal and the poor alignment of the existing issue driven plans identified as recreation compounds our concerns around the Proposal as we have a mismatch in the desired results of the Outdoor Strategy and scope of many of the plans identified as recreational in the Proposal. The challenges presented from the imbalance of existing planning resources identified compounds when the overly optimistic scope of the limited number of recreation plans is reviewed. Simply comparing the number of conservation plans with recreation plans makes a fatal assumption, mainly that each plan is reasonably comparable in terms of scale and development. This assumption would be incorrect. Most recreation plans simply are not strategic recreation plans but rather are plans attempting to *manage* specific recreation issues or an issue only incidentally related to recreation. Unlike most of the wildlife or conservation plans that are identified which develop strategic goals and objectives, most recreation plans identified are simply not strategic in nature and some plans are identified as recreational in nature but fail to address recreational issues.

The overwhelming portion of the recreation plans identified target recreation management issues and entirely fail to ask basic strategic questions around recreation supply and demand generally. Many recreational plans simply seek to manage recreational issues and fail to answer foundational questions around recreation in all forms or any specific information on particular uses or

opportunities that could be developed to address these challenges. We are not aware of planning efforts that approached addressing strategic recreational questions like: “Do we have areas of the state that are currently facing shortages of recreational access?”. For too long recreational management has been driven by pictures such as these of a Wilderness Trailhead outside Crested Butte.



After pictures like this appear, everyone agrees there is a need for more parking at the location. No one ever asks “How did we not see this issue coming?” and a parking lot hopefully gets built. After the parking lot hopefully gets built no one ever asks a question like “What can we do to avoid this situation in the future?” Asking strategic questions like this could address failures such as this in the future and protect wildlife resources and improve recreation.

We are not aware of strategic questions like “Could we put a public golf course at a state park?” being asked either. These types of questions could lead to State Parks being a more valuable resource for the public and CPW expanding its recreational role in the state while making the State Park System more financially sustainable. Rather than understand possible future demand for State Parks the Proposal simply does not talk about them at all despite many State Parks seeing similar situations on busy weekends as is reflected in the trailhead pictures above. These questions are not answered without significant effort and data, most of which is not available. This basic information for what the recreational community needs to be sufficient is the equivalent to identifying the

necessary herd size and habitat zones for wildlife management and sustainability. It is the first step in planning. Conservation has addressed these foundational questions decades ago, the larger recreation community is only starting to understand there could be a need to address usages at this level. While cellular based data will be critical in resolving these questions, we simply cannot wait for this data to be obtained and understood. Recreational interests will simply be further behind by that point and questions will remain unresolved.

Our concerns around the narrow scope of recreation analysis is exemplified by the focus of existing plans being issue driven management in nature and scope. The first plan highlighted in the Proposal that suffers from this issue of a limited scope of analysis is the Colorado Tourism Office's Destination Stewardship Plan. We have worked with Colorado Tourism Office for several years in the development of the CTO plan and support the conclusions of this stewardship effort. This planning effort has targeted important issues like managing expectations of the public, the need to educate the public in the backcountry and building awareness of the recreational public to avoid impacts on a very high level. These are critical goals for recreation but are also needed for public safety, as exemplified by the fact most of the recommended needs for backcountry recreation are also highly relevant to simply traveling in Colorado in the winter. We would assert that the CTO plan is a recreation management plan rather than a recreation plan. CTO would be poorly suited to even address expanding recreational opportunities or understanding recreational demands in a planning effort. Questions like: "Could we build a golf course at a state park?" are simply outside the scope of these efforts as the CTO plan would address management of a golf course once built. While these are important factors to understand, these shortcomings undermine the value of this plan for strategic use.

Another planning effort generally identified as recreation which falls outside the scope of a strategic recreation plan and targets recreation management is the OREC planning effort forthcoming. The OREC plan primarily targets economic development for the outdoor industry but is identified as an Outdoor Recreation Plan. We have enjoyed a good relationship with the OREC office for many years, and many of our members have been engaged in their COILS efforts and various roundtables. We support their efforts and mission as economic sustainability is important to all activities in Colorado. While we support this effort, it does not alter the fact that this is an economic development plan that

targets recreational businesses in Colorado. Again, this is not a strategic recreation plan but rather a planning effort that incidentally relates to recreation. With this narrow scope of the effort, many basic recreational questions will simply be outside the scope of authority for the Office and clearly outside any research that OREC might be conducting for a planning effort. While this effort is valuable, this type of issue driven effort will not address recreational balance at any scale.

While some plans have a limited strategic value for recreation, some of the issue specific plans identified entirely lack any meaningful discussion of outdoor recreation. An example of issue specific plan identified as recreation plan which really does not address recreation would be the Colorado Historic Preservation Plan. When reviewed the only mention of recreation in the Historic Preservation Plan is provided in the summary of the statutory scope of various agencies involved in public lands management, making any assertion of outdoor recreation problematic with the scope of the plan. Are historic resources a possible recreational opportunity sought by the public? Of course, but this activity is more aptly summarized as tourism rather than recreation. If the Proposal hugely broad definition of outdoor recreation is applied to the Denver Broncos, the Bronco's strategic planning efforts could be included in the Proposal as a recreation plan as the Broncos are a major tourism driver and people are outside. The Organizations do not believe this is the focus of this effort and would result in the fact the Colorado Historic Preservation Plan does not meaningfully address outdoor recreation being overlooked.

When the strategic nature of the Proposal and the strategic nature of recreation plans is compared, there are only a few plans that start to address recreation, such as the CPW Strategic Plan, State Trails Plan and GOCO plan that address recreation in a strategic manner. The Proposal must address strategic development of recreational plans to begin to address recreation challenges in a strategic manner. We would encourage the Proposal to clearly focus on outdoor recreation planning to avoid inclusion of plans only incidentally address outdoor recreation being identified as a plan highlighting recreational needs. The Organizations are aware there are immense questions and challenges that the state faces that are simply outside the scope of the CTO, OREC and State Historic Preservation Office effort to even address and as a result they were not addressed as they were outside the mission of these offices.

2(a) CPW has created similar strategic plans and they reasonably balanced recreation and conservation.

The Organizations have partnered with CPW for an extended period of time and it is unfortunate to note that this is not the first time that there has been significant pressure on CPW for a variety of reasons. The Organizations are concerned that unlike previously heavily pressured planning efforts, the strategic long-term benefits of recreation planning are not addressed in the Proposal. This messaging could have significant impacts on other efforts of CPW to develop partnerships with new user groups. This type of unintended impacts of the Proposal would be exemplified by CPW discussions around the development of a mountain bike registration program similar to the OHV and snowmobile programs. Our Organizations and CPW has found exceptionally successful in achieving the goals of the EO. The Organizations have participated in these strategic programs and discussions for almost a decade and previously a report such as the Proposal has been used to guide these efforts. The Organizations vigorously assert that the Proposal will not further these types of strategic efforts, as there is simply nothing in the Proposal that CPW can identify to support the need for the mountain bike community to collaborate in the same manner as our Organizations have for decades.. CPW has always found a way to balance the values and move forward with its mission. The Proposal simply fails to achieve these strategic goals and must be balanced to further the history of success that CPW has had in balancing many critical values for the state.

Historically, an example of this type of strategic planning effort would be from the merger of the old Division of Wildlife and Division of Parks, which was a massive undertaking and resulted in conflicts and divisions of interests during the merger process. Balance was achieved in this effort despite immense public pressure. As the merger moved forward, CPW created what was known as the Path Forward document to identify major challenges and clarify planning objectives. A copy of this document is attached as Exhibit “A” to these comments. The Organizations must specifically address the fact that the major challenges identified in the Path Forward planning document largely mirrors the goals and objectives of EO 2020-008. As the merger moved forward the Path Forward plan was developed. A copy of this Plan is attached as Exhibit “B” to these comments.

CPW and partners have made major headway in resolving these strategic challenges in the decades since the Path Forward. This is clearly evidenced in the 2016 CPW Strategic Plan almost immediately after the Path Forward was completed. The Organizations were again vigorously involved in this planning effort and can say with absolute confidence that many of the same concerns and issues were present when the 2016 CPW Strategic Plan was developed as are present here. These issues were balanced and success was achieved because of the balance in the plan. Since the 2016 CPW Strategic Plan was finalized, species have been reintroduced, new parks have been opened, new funding streams created, visitation to all forms of recreational opportunities expanded with hundreds of millions in grants flowing to a wide range of local communities and recreational operations and wildlife operations were integrated. This is the long term strategic success we believe must be the goal of the Proposal and simply has not been achieved. The Organizations are aware that if these historical planning documents were out of balance, strategic success such as this would not be achieved.

As a long term partner of CPW, we welcomed the issuance of EO 2020-008 as we thought this recognition was an important step in maintaining the strategic focus and updating existing efforts around these strategic goals as these needs are always evolving and changing. We must ask why success around these existing foundations would not be highlighted in the Proposal. If we do not periodically review these goals and celebrate success, efforts can get off track. Unfortunately after reviewing the Proposal, we must express concern that the strategic check in effort to ensure the long term goals of CPW has gotten off track. Rather than confirming the basic course and providing basic corrections or alterations to address changes in strategic goals since the 2016 Strategic Plan, the Proposal paints a very different and more troubling picture for the relationship of the factors previously identified as priority challenges. The Organizations really hope this is incorrect as we have not seen the last decade of partnership with CPW as anything less than a major success. The model for a successful balancing of these strategic values already exists and should be used.

2(b) Newly designated State Parks and the success of the existing State Parks are not even mentioned in the Proposal.

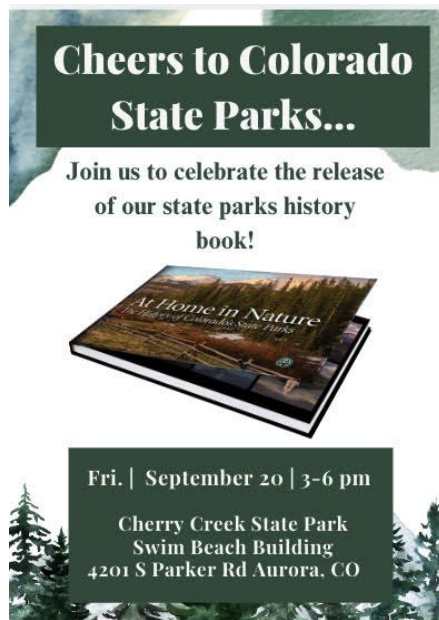
The imbalance of analysis of values in the Proposal has led to hugely successful efforts simply being overlooked. This imbalance in analysis was immediately visible in the Proposal as the State Park system is simply not addressed in the Proposal. While the Organizations are most commonly engaged with CPW on motorized trails issues in the State, our interests and those of our members extend beyond just motorized trails. Many of our members are passionate about our system of State Parks, and often hunt, fish, hike and experience Colorado outside the use of motorized trails. The fact that the State Park system is often the first place many youth and underserved communities able to obtain an outdoor experience in any manner cannot be overlooked. This portion of CPW operations has always been a huge success in achieving the goals of the Outdoor Strategy as State Parks are often reasonably accessible for the public and provide a more intensive and managed recreational opportunity for the public when compared to the self-guided type of opportunities that those more advanced obtain on Federal lands across the State. The State Park System has also opened two new State Parks and looking at a third in the next couple of years. While there have been challenges around the two parks opened to date, such as exceptionally low visitation to Fisher's Peak SP, these are major efforts and should not be overlooked. If success is not highlighted, how is success ensured in the future?

The omission of any mention of State Parks in the Proposals is simply confounding given their huge success for an extended period of time. Even more confounding is the recent release of the CPW book celebrating the Colorado State Parks System and more specifically the strategic efforts of the Organizations in providing sustainable recreational opportunities as follows:

“Responsible motorized users, represented by the Colorado Snowmobile Association and the Colorado Off Highway Vehicle Coalition realized that without regulation, their access to public lands would soon be severely curtailed or possibly prohibited. In the spirit of public/private partnership these recreationists approached State Parks and requested help in establishing the Colorado Snowmobile and Off-Highway Vehicle Programs. The premise of the programs was simple yet unique. First, set up a registration program to track the ownership of the vehicles and create a funding base to support maintenance of existing trails and construction of new trails. Second set up safety and use regulations to help promote a family orientated sport that respected

Colorado natural resources. These two programs have been hailed as examples of how the government and the public can work together to provide new forms of recreation while protecting Colorado natural resources.”³

The Organizations vigorously welcome recognition of this partnership in the new State Parks book and must question why sentiments such as this have been entirely omitted from the Proposal. This book release has coincided with this Proposal is being introduced and while the book is appreciated, it is not a replacement for strategic planning. A copy of the announcement from CPW is as follows:



Given the overlap of these two efforts, the Organizations would have to believe that the newly released book could be adopted in the Proposal in some manner. Again, why wouldn't success such as this be highlighted?

Our concerns around the failure to mention the immense amount of strategic success that Colorado has been able to achieve with the State Park System relates to the fact there are simply no strategic questions asked to ensure the future success of the State Park System in the Proposal or most underlying planning efforts. These strategic questions would include: “How many Parks are at or beyond existing capacity?” or “Are there opportunities for the public that could be provided on a State Park but have not been?” or “Would the public be willing to pay more to obtain these additional

³ See, CPW; “At Home in Nature A History of Colorado State Parks”; 2024 at pg. 52.

experience?” Strategic planning may be needed for some efforts but other responses could be developed quickly and easily to remove pressure from uses on adjacent federal lands. Many of these strategic challenges are being more visible in certain geographic areas of the State. Ignoring them will not make them go away. If we are unwilling to address challenges such as this in a strategic recreation and conservation plan, the Organizations would ask what type of plan is needed and why are we not seeking to create this type of plan currently.

It is unfortunate to see a difficult financial situation looming for CPW similar to that which faced CPW at the time of the merger. The Organizations are expecting budgets to become exceptionally tight and the Organizations can remember merger meetings where ¼ and ½ costs of full time employees were being identified in an effort to control costs in the merger discussions. The Organizations cannot overlook the fact that the preliminary efforts of the 2025 Joint Budget Committee have preliminarily identified a \$1,000,000,000 shortfall for the State budget this year. While we are sure that the JBC will be able to minimize these impacts and CPW budgets do not look as grim as the State more generally, this situation is concerning and would cause us to express the need to be strategically addressing recreation needs in a more challenging budget situation than is currently being faced. These are simply long-term challenges that should be addressed.

2(c) Groundbreaking CPW efforts to recognize trails and conservation have been nationally recognized by partners but entirely omitted from the Proposal.

The existing imbalance in the Proposal on recreation and its possible benefits to conservation has resulted in what can only be summarized as unusual shortfalls for the Proposal. While we are frustrated that State Parks are not mentioned, the silence on trails issue is even more problematic to our Organizations. CPW Trails embarked on a groundbreaking effort to update the Planning Trails with Wildlife in Mind Guide in 2022. This effort took two years and more than a dozen partners including conservation groups, recreation groups, local and state governmental interests and federal land managers to develop. This updated guide was heralded by all interests in Colorado as a huge success. The USFS recently issued their final DEIS on Old Growth Timber management, which specifically recognized the groundbreaking nature of the Trails and Wildlife Guide as follows:

“State wildlife agencies are responsible for managing wildlife populations. The Forest Service is responsible for managing habitat. However, the Forest Service has a unique mission with a multiple use mandate. Some state wildlife agencies are developing more interest in recreation and how to meet wildlife conservation outcomes at the same time. One example of this is the Colorado Parks and Wildlife “Guide for planning trails with wildlife in mind” (2021). The guide was developed with the participation of the Forest Service and several other agencies and organizations. Integrating conservation into recreation and trails planning is one of the guides purposes and it provides a framework for how to do it.”⁴

One of the foundations of our partnership with CPW, and other land managers, is the collective understanding that planned and maintained trails benefit recreation and conservation. The situation where partners are willing to nationally recognize Colorado success in balancing recreation and wildlife in trail development and management and CPW is not willing to address this success in any manner is awkward at best. This is a significant indication of the failure of the Proposal to balance these values.

2(d) CPW has many other successes balancing recreation and conservation that are not highlighted.

The immensely successful CPW efforts to balance conservation and recreation extend far beyond the State Park System. The motorized components of the State Trails Program have provided more than \$100,000,000 in total funding for the balancing of recreation and conservation since the inception of the various programs. The Organizations would submit that the mere value of the program in terms of direct and unique partner funding would have made the program sufficiently important to warrant inclusion in the Proposal. The value of these programs extends far beyond the value of the program as the strategic value in recognizing these types of partnerships in a document such as the Proposal cannot be overlooked. As previously noted in these comments, the Organizations have been involved in discussions with the mountain bike community about formation

⁴ See, Dept of Agriculture; US Forest Service; *DRAFT Social, Economic and Cultural Impacts Analysis Report for the Draft EIS for Amendments to LMPs to Address Old-Growth Forests Across the NFS*; June 2024 at pg. 59.

of a program similar to the OHV program for mountain bikes. Failing to recognize these benefits of existing partnerships will not encourage the development of future partnerships being formed with CPW.

While the Organizations are certainly biased on the desire to recognize that program at any point, CPW's OHV program has also provided millions of dollars to the Colorado Youth Corp over the last several years. The mission of the Youth Corp partnerships almost completely overlaps with the vision of the Proposal. The mission statement of the Youth Corp effort is clearly identified as follows:

“The Colorado Youth Corps Association aspires to be the leader in conservation and service and empowers corps to change lives statewide. CYCA will focus on five strategic goals through 2022:

- Secure project work on behalf of members
- Channel Diversity, Equity, and Inclusiveness resources to corps
- Optimize member services and programs
- Ensure revenues are resilient and sufficient
- Tell the collective corps story to a broader audience

The overarching outcome of this strategic plan will be that more youth, young adults, and veterans in Colorado will experience the transformational impact of service through corps.”⁵

Again, we must question why an effort such as this would not be recognized in the Proposal. Clearly strategic development of programs such as this should sought to be developed given the immense overlap between the goals of the Proposal and the success of this effort. The efforts of the Youth Corp and CPW OHV program were highlighted in a video about the benefits of these efforts in restoring access to burn scar areas so additional management and resource and wildlife protection can occur.⁶

⁵ [Strategic Plan - Colorado Youth Corps Association \(cyca.org\)](https://www.cyca.org)

⁶ [Restoring impacts from the East Troublesome Fire in the Sulphur Ranger District \(youtube.com\)](https://www.youtube.com)

CPW partnerships through the OHV program extend far beyond Youth Corp efforts. CPW OHV grants restored exceptional recreation opportunities in partnership with National Forest Foundation repairing the Palisade Wall outside Gunnison, Colorado. The impact of this effort was celebrated in their video highlighting this efforts and the unique benefits it has provided to individuals that may not have experienced the outdoors in this manner previously. ⁷ The same project has been recognized as immensely successful by the OHV community as well.⁸ Each of these efforts is worthy of recognition in isolation. When these efforts are compared to the goals and objectives sought to be achieved in the Proposal, that need for recognition only expands exponentially. Not recognizing successes such as these sends a message as well and that message should be avoided.

Another hugely successful strategic effort which has resulted in CPW success with partners in balancing recreation and conservation is evidenced by the development of the COTREX application. This free to the public app has been an immense step forward in balancing the desire of the public to recreate while protecting wildlife. Now the public has tools to understand when trails are open and when they are closed for wildlife and other reasons Colorado is unique in providing this resource to the public and now the public can understand if a trail is open or closed and why the closure is in place. This is an immense step forward and should be recognized.

The failure of the Proposal to address the State Parks system or other partner efforts was perplexing for the Organizations. Even more perplexing is the failure of the Proposal to address hunting and fishing opportunities and the challenges that those activities might be facing. These are activities that simply never mentioned in the Proposal despite the North American Model of Wildlife management being the foundation of CPW and its ability to balance recreation and conservation on hunting and fishing related issues as well. The Proposal also fails to recognize many other partners who have worked towards success with CPW such as the farming and ranching community. Not only has this community been integral to the success of CPW historically, this partnership is also critical to recreation as many of the winter grooming efforts are based on ranches.

⁷ A copy of this video is available here: [National Forest Foundation | Looking for an epic drive on the Grand Mesa Uncompahgre and Gunnison National Forests \(GMUG\)? Come along with @baratunde for the highest... | Instagram](#)

⁸ A copy of this video is available here: [Alpine Tunnel Palisade Wall Rebuild | Project Overview | Funding | Tomichi | Williams | Hancock \(youtube.com\)](#)

3(a) Planning documents must rely on accurate up to date information.

The Organizations frustrations with the Proposal continue beyond the mere omission of quality long term partnerships with CPW that have balanced recreation and conservation efforts for decades. Much of the data provided as the baseline for analysis is overly divisive in both the nature of the data and how it is presented. This situation is compounded as often much of the information is simply badly out of date. This is exemplified by the Proposal provisions on of climate resilience provide as follows:

“The vast majority of Coloradans (83%) support a national goal of conserving 30% of America’s lands and waters by the year 2030, and 60% believe that loss of habitat for fish and wildlife is an extremely or very serious problem.¹¹ According to CNHP, approximately 20% of Colorado’s mammals, birds, and reptiles are at risk and 40% of fish and amphibian species are at risk.¹²”⁹

The impact of this at best out of date and negatively presented provision cannot be overstated as this is one of the few locations hard data is provided on issues the Proposal is addressing. The Organizations initial concerns on the above provisions would start with accuracy of the data being relied on for this position and basis for action being more than a decade old. This starting position of analysis is problematic simply because of the age of the information. We hope that the decade of effort that has been provided by CPW and partners would have impacted these conclusions at some level. We simply must do better from this perspective.

Taking these provisions in the order they are presented in the Proposal, we will start with the information around what has come to be known as the 30x30 concept which has been memorialized by President Bidens EO 14008. It is frustrating to the Organizations that the Proposal opens the discussion on the 30x30 concept and then provides absolutely no information on what has been done to date to address these concerns. Data shows the immense success of efforts to date. Every acre of public lands in the State is protected from disposal or misuse as these lands have specific

⁹ See, Proposal at pg. 43.

statutory public engagement requirements and findings of fact that must be complied with to be disposed of. Many acres have received protections well beyond these basic levels of protection. USFS estimates that almost 60% of the lands they manage is protected at higher levels than traditional public lands. DOI has expressed similar levels of success on achieving these goals. Why wouldn't this information be included in the document.

The failure of the Proposal to accurately address the current status of the 30x30 issue extends beyond the presentation of inaccurate and out of date information. There are impacts from this presentation that are simply not addressed. As a result of the information and data being out of date, implementation questions around next steps for management decisions are not addressed. If this information is updated and public understanding of these issues remains at these, this would identify the need for a public educational effort on these issues. The scale of success is immense as the USFS estimates that almost 60% of lands they manage in Colorado have already received some form of heightened protections (Wilderness or Roadless or other designations). DOI is still calculating their levels of additionally protected lands and are approaching the 30% goal. CPW lands are 100% protected. The average of these estimated levels of compliance with the goals identifies a huge success! Again, if the public is not aware of this success we should be starting with education and not requesting additional protection. Misguided efforts such as this will only create conflict and erode support for future management efforts.

If only 20% of species are perceived to be at risk this means that 80% of species are perceived as NOT at risk. No matter how we look at the proverbial glass in terms of ½ full or ½ empty, this is a HUGE success and should be highlighted in the Proposal. Again rather than seizing this success and educating the public the Proposal somehow finds a mandate for management response. The scale of the success in species management cannot be overstated as most species are doing historically well in terms of populations.

We are also concerned that the Proposal uses information from outside sources over information from CPW, despite the fact that CPW is the agency with the statutory obligation to manage wildlife in the State. The Proposal's failure to address populations with the most accurate information possible will have profound effects on the accuracy of data being provided in the Proposal. CPW's

own species population estimates provided in the 2023 Wolf Management Plan have widely different populations trends for the most visible species in Colorado identified from those in the Proposal. The 2023 Wolf Plan clearly estimates that elk populations are more than 30% above objective in the State as follows:

“The sum of Colorado’s post-hunt HMP population objective ranges for elk statewide is 252,000-306,000 for all 42 elk herds combined. These data indicate that Colorado’s elk population is over objective”¹⁰

The 2023 Wolf Plan outlines that mule deer populations were roughly 10% below objectives. This 2023 Wolf report outlines how the challenges from the mule deer population situation presents a more complex management situation as follows:

“The statewide deer population has been more stable recently, averaging 420,000 over the last 11 years. The sum of all herd population estimates is still far below the sum of individual HMP population objective ranges of 438,000-520,000 for all 54 deer herds combined. Declines in deer populations are primarily in the largest, western most mule deer herds in the state. In 2021, 26 of 54 (48 percent) deer data analysis units were within their population objective ranges and 18 of 54 herds (33 percent) were below their population objective ranges. There is on-going interest from various constituents to increase mule deer populations; however, for many deer herds, population management is largely dictated by herd productivity and performance, winter severity, and Chronic Wasting Disease (CWD) prevalence.¹¹

The 2023 Wolf Plan also clearly identifies that the moose population are exploding as follows:

“CPW transplanted moose into Colorado to create hunting and wildlife viewing opportunities. The first transplant occurred in 1978–1979 into North Park. Other major transplants included the Laramie River drainage (1987), Upper Rio Grande River

¹⁰ See, Wolf report pg. 16.

¹¹ See, Wolf report pg. 17.

(1990), Grand Mesa (2000), and White River drainage (2010). As a result of these efforts, moose have become an important big game hunting and popular watchable wildlife species in Colorado. Moose populations are increasing, and they continue to pioneer into new habitats on their own. The statewide 2021 winter moose population estimate is 3,500.”¹²

The 2023 Wolf report accurately outline the success of wildlife efforts in Colorado, which is unparalleled and extends well beyond the wolf reintroduction and the species addressed in this report. Since 2012 the Canadian Lynx reintroduction has been declared a success, black footed ferrets have been successfully reintroduced, many species of fish have also been successfully reintroduced to name a few successes. The Organizations are aware that there are many other species in similar situations. These successes simply are not mentioned at all the Outdoor Strategy despite these efforts being huge successes for conservation. This must be corrected in order to allow management efforts to move forward and build on the success in place.

The combined impacts of relying on third party data that is simply old and poorly focused has allowed the Proposal to recommend management tools that will only further divide interests and never address the challenges facing the state. This allows badly needed management responses, like the need to educate the public about the huge successes in Colorado wildlife successes, to be overlooked. Given the discrepancy in actual data and what the perceived situation is for the public on wildlife that the Proposal outlines, the Organizations would assert Colorado does not have a situation where radical changes in wildlife management are needed. Rather Colorado is in a situation where the public needs a wildlife education program that is educating the public that most species are doing well in the state. This is a type of a strategic educational program would be vigorously supported by the Organizations and unfortunately the Proposal does not even address this but rather continues to move forward with inaccurate analysis.

3(b) The Proposal creates distinctions on terms that don't exist and then attempts to craft responses based on these arbitrary distinctions.

¹² See, Wolf report pg. 17.

The Organizations are very concerned that the limited amount of recreational information provided in the Strategy is not accurately outlined. Compounding this concern are attempts in the Proposal to create distinctions between concepts we have supported for decades for reasons that remain unclear. The Proposal seeks to draw distinctions on efforts that simply cannot be distinguished or justified, such as attempting to distinguish between stewardship and maintenance. These types of efforts are only going to create confusion of the public and direct resources that are often limited to areas and issues that are of limited value. In several locations the Proposal seeks to apply SCORP research but fails to address SCORP research accurately. This results in some priorities being diminished in favor of other challenges. The Proposal fails to recognize that the priority concern clearly identified in the SCORP manager survey is improved access for recreation. This conclusion is simply never mentioned, while other concerns around lower priority management challenges around various recreational activities are addressed. Strategic planning efforts should not pick and choose results of supporting documents. If there is confusion in underlying documents either the confusion should be recognized and addressed or other management documents should be used.

As an example of the unique positions taken in the Proposal, is the interpretation of the SCORP data and attempts to distinguish between the concept of stewardship and maintenance. Both of these are concepts the Organizations vigorously support and we would submit are concepts that are poorly distinguished in the SCORP research. The Organizations would generally accept that stewardship is more of an ethic while maintenance may be focused on boots on the ground and issues being resolved. While we might be able to distinguish between these concepts with highly detailed definitions, most of the public will not see a difference in these concepts. Rather than clarifying the accuracy of this type of distinction, the Proposal attempts to highlight these two concepts as entirely separate issues and then provides separate management responses to each.

These distinctions of efforts become academic as the Proposal then combines definitions as it identifies efforts for stewardship including picking up trash and other maintenance type activities. While this type of confusion would normally be overlooked, the Proposal tries to assert that management responses and priorities should be different based on the distinctions between stewardship and maintenance. The problematic nature of the Proposal compounds due to the fact that often stewardship scores significantly lower than maintenance responses in some portions of

the research but this is not recognized in the Proposal. In several locations, the Proposal creates management needs and responses that appear to be based on arbitrary distinctions of this data. These types of distinctions are unique in nature and are presented in at best a confusing manner, which is exemplified by the discussion on pg. 57 of the Proposal that appears to assert that stewardship and maintenance are different goals as follows:

“For example, in the 2023 land manager survey conducted for the SCORP, about 70% percent of respondents identified addressing stewardship issues from increased use as a ‘high’ trail-related priority, while federal and state managers identified it as the top priority.”³⁹

The Organizations would first have to question this summary of the SCORP survey as we are unable to identify any portion of the survey that provides the conclusion that stewardship was the largest priority for land managers. Rather the survey clearly outlines its priority for management response as follows:

“High priority new outdoor recreation sites

- Overall, survey respondents identified developing new trails or expanding existing trails as the highest priority with respect to new outdoor recreation sites (72%), followed by connecting to adjacent or regional trail systems (66%), and developing neighborhood, community, or special use parks or facilities (e.g., playgrounds) (60%).
- Local and federal respondents prioritized similar outdoor recreation sites.
- For example, developing new trails or expanding existing trails was the highest priority for both groups (Local = 73%; Federal = 82%) (Table 1).
- Connecting to adjacent or regional trail systems was the third highest priority for local (67%) and federal (72%) respondents (Table 1).
- Expanding the amount of land open to the public and obtaining access easements were also in the top five highest priorities (by percentage).
- The highest percentage priority among state respondents was expanding opportunities for hunting and fishing (92%).

- However, similar to their local and federal counterparts, state respondents also identified expanding the amount of land open to the public and obtaining access easements as high priorities.
- Similar to federal respondents, about 72% of state employees identified developing campgrounds as an important priority (compared to 77% of federal respondents) (Table 1).
- Respondents to the 2019 SCORP LMS also identified developing new trails or expanding existing trails as their highest priority (56%).
- Connecting to adjacent or regional trail systems was the second highest priority in 2019 at 49%, and developing neighborhood, community, or special use parks or facilities was the third highest priority (44%).”¹³

Our concerns around the impacts of this inaccurate presentation of information are immediate as the highest priority issue from the land manager survey simply is not addressed at all in the Strategy. This priority for most managers is developing new trails and infrastructure, which is an immense strategic planning problem. The Proposal then fails to even address the situation that the Survey seems to assert that stewardship and maintenance are so how mutually exclusive. This is outlined in Table 2 of the Survey as follows:

Table 2. Highest trail-related priorities according to local, state, and federal respondents

Prioritization	Trail-related high priorities	Local (%)	State (%)	Federal (%)
1	Maintaining existing trails	81		
2	Creating or improving opportunities for ADA accessibility or usability	72		
3	Connecting community assets (e.g., a park to a neighborhood or school)	72		
4	Addressing stewardship issues from increased use (e.g., human waste/increased trash; social trails)	63		
5	Creating opportunities for non-motorized trail users (e.g., hikers, mountain bikers)	61		
1	Addressing stewardship issues from increased use (e.g., human waste/increased trash; social trails)		84	
2	Creating or improving opportunities for ADA accessibility or usability		82	
3	Maintaining existing trails		81	
4	Providing education and interpretive opportunities (e.g., self-guided, signage)		72	
5	Re-routing/improving trails to modern, sustainable design		69	
1	Addressing stewardship issues from increased use (e.g., human waste/increased trash; social trails)			96
2	Maintaining existing trails			96
3	Re-routing/improving trails to modern, sustainable design			95
4	Providing adequate parking/access to existing trails			83
5	Enhancing trailheads with amenities (e.g., bathroom facilities)			78

¹³ See, 2024 SCORP land manager survey at pg. 23. A copy of this survey is attached as Exhibit “3” to the Proposal for your reference.

Rather than providing a clear basis for management response, the immediate question the Organizations have on this issue centers around our concern that respondents understanding of the asserted difference between stewardship and maintenance when the survey responses were collected. The Organizations would submit this lack of clarity on this distinction is a weakness of the Survey and not the basis for different management responses.

The problematic nature of the summary in the Proposal is immediate as stewardship and maintenance are identified by some managers at similar levels of concern in the Survey, while other managers provide significantly different levels of preferences, making any distinctions problematic in nature. This conflict would be exemplified by the conclusions of local managers that maintenance is a priority 81% of the time while stewardship is a concern only 62% of the time. By comparison federal managers identify stewardship as prioritized goal 96% of the time and maintenance is **also** identified as the top priority 96% of the time. Rather than using this data to create management responses, the Organizations submit these conclusions are inconclusive or needing further review. These concerns are compounded as this research concludes stewardship is the #2 management concern and many managers have a strong preference towards improving access. This lack of clarity in goals and objectives will create challenges in implementation and move away from the large support that management and stewardship have received from the public and the Organizations for decades. This is a distinction that simply does not exist.

4(a). LEAN process on meetings.

As previously outlined, when any planning effort relies on inaccurate or outdated information to support its decisions this is problematic as strategic management options addressing the true challenges facing the balancing of recreation and conservation may not be addressed. Many existing challenges we are facing in achieving these goals could be made worse rather than better as a result of poorly directed or misguided management responses. An example of this type of an impact would be the meeting/volunteer fatigue we have experienced over the last several years. The Organizations are concerned that the Proposal is going to lead to more overlapping meetings with similar missions occurring across the State. It has been our experience that currently there are simply too many meetings for the public to engage with and often these meetings have overlapping goals and

objectives and seek to reopen issue that were just completed. The Organizations would note that even when there are isolated efforts to address recreational issues, they are often problematic.

Our concerns around meeting/volunteer fatigue impacts to the organized recreational community as more meetings are already identified in the Proposal. This is exemplified by the requirement in the Proposal on Page 14 discussion on more groups and meetings being developed in 2025 as follows:

“Convene an outdoor recreation leadership roundtable among federal, state, local and private recreation executive-level leadership to drive greater coordination and alignment of goals and actions.”¹⁴

While we welcome more coordination of resources for recreation, we must question why more meetings and groups are thought to be needed for this effort? This is VERY concerning as there are too many meetings already and many of these efforts could easily be incorporated into existing efforts such as the COOP. This would avoid repetition of efforts and strengthen existing partnerships and efforts and avoid situations where groups addressing similar challenges come to different conclusions. It has become an all too frequent response in meetings when there is a mention of a new series of public meetings that the entire room utters a collective groan.

As an example of the management responses that could address the meeting fatigue would be a goal in the strategic plan of reducing the number of meetings and making existing meetings more effective. The motorized community underwent a LEAN type planning process in 2015 when there were too many steps in the grant process. This effort resulted in a grant process that was far more effective and streamlined. This was a huge success, which probably does not warrant inclusion in the Proposal but the experiences from this effort are highly valuable and could lead to a goal of rather than more meetings we should focus on our existing meetings becoming more effective. Again, these types of impacts should be avoided as they benefit no values identified in the Proposal or EO.

¹⁴ See, Proposal at pg. 14.

4(b) Hiring of employees is a massive barrier to moving forward with all values but this is not mentioned in the Proposal.

The Organizations are concerned that one of the largest barriers currently to recreation, stewardship, maintenance and conservation efforts throughout the Country is the inability to hire employees at almost all levels of government. This challenge is simply not addressed in the Proposal at all despite this being an immense problem in Colorado. The Organizations are intimately aware that over the last several years almost 50% of the funding from the OHV program provide to federal lands managers for the hiring of seasonals is returned. As we write these comments, federal hiring and retention of seasonal employees under the Continuing Resolution has again become a problem. These are impacting all forms of recreation on federal lands, and while CPW has performed better than federal agencies for hiring these resources fall well short of filling the need.

The Organizations would vigorously support inclusion of how to address this challenge as a goal of the outdoor strategy as this would promote all values of the effort. Is this something that could be addressed with expanded hiring of maintenance staff for federal lands through CPW? What barriers are present to allow partners to fill this void? How can other barriers in federal hiring be addressed? This is a large multifaceted challenge that warrants discussion and may take years to resolve. While there are many values that are elevated in the Proposal, this challenge that could be resolved and unite all interested parties simply is not addressed.

5. Guidance should be provided regarding the timing of Proposal in relation to regional plans.

In the discussions that the Organizations have participated in regarding the Proposal one of the most common questions we have heard is why is the State Plan is out before any regional plans? The Organizations would ask the similar question. While we are aware that implementation of EO 2020-008 has proven to challenging due to the aggressive timeframes it sought to develop and the evolving nature of the regional efforts, this is a valid question and basic information and guidance should be provided. Without guidance on this issue, regional efforts may be inclined to try and align their plans developed subsequent to this with the Proposal rather than the opposite as was required by the EO. is there an intent to align with regional plans or update at some point?

6. The public remains confused about the effort.

The Organizations remain concerned that the public understanding of the goals and objectives of the Proposal is limited and this creates concern regarding how the Proposal will be used. We recently concluded our annual OHV workshop and training in partnership with CPW, USFS and BLM, where we celebrated the numerous highly visible and successful projects of the trails community that have been achieved in partnership with CPW. This was attended by more than 80 people and included a targeted session on the SCORP and Outdoor Strategy. The most common question about the Outdoor Strategy was: “Why is the State undertaking this effort and how does it relate to existing planning?” Several more questions expressing similar concerns were provided in the feedback forms participants were asked to complete at the end of the event. Copies of these forms are available upon request. This concern cannot be overlooked and concerns such as these are made more difficult to address when the Outdoor Strategy is badly out of balance in terms of conservation and recreation. When layers of uncertainty are added to each other, the possibility of mission creep expands for CPW and the possibility of unintended impacts from the effort become more significant. The Organizations submit that clarity and balance in the Proposal is of heightened importance in these situations to avoid these types of impacts and that has not been provided.

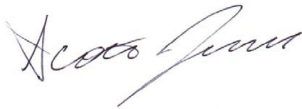
7. Conclusion.

We thank you for this opportunity to comment on the Proposal and hope the Proposal can be developed in a manner to allow recreation and conservation issues to be addressed more effectively and recreation and conservation can also be balanced. This alignment will also allow shortfalls in the recreational planning process to be addressed in the long term to allow for challenges to be most effectively addressed. The Organizations can simply say we are disappointed and frustrated with the Proposal. Our disappointment centers around several general issues including: strategic recreation planning has simply been largely disregarded in the Proposal despite it being a cornerstone of the effort; the Proposal is silent around the huge success Colorado has had in providing sustainable recreational opportunities for decades; many CPW partner groups and their challenges in providing sustainable recreational opportunities simply not mentioned in the Proposal; and often third party

information is relied on instead of CPW data. The need to accurately understand and recognize challenges facing Colorado will be critical in crafting an accurate and effective response in furtherance of mandates of EO 2020-008. While we are aware that data from the effort will be highly valuable to the recreational community moving forward, the first usage of this new data cannot be to correct poorly directed management efforts that resulted from foundational failures in the Proposal. The Organizations are very concerned that the cumulative impacts of the challenges of the Proposal reliance on imperfect information and failing to recognize the success that has already been achieved will result in poor management decisions.

The Organizations and our partners remain committed to providing high quality recreational resources on federal public lands while protecting resources and would welcome discussions on how to further these goals and objectives with new tools and resources. If you have questions, please feel free to contact Scott Jones, Esq. (518-281-5810 / scott.jones46@yahoo.com), Chad Hixon (719-221-8329 / chad@coloradotpa.org).

Respectfully Submitted,



Scott Jones, Esq.
CSA Executive Director
COHVCO Authorized Representative



Chad Hixon
TPA Executive Director



Marcus Trusty
President CORE