



June 12, 2024

BLM Utah State Office
ATTN: HQ GRSG RMPA
440 West 200 South #500
Salt Lake City, UT 84101

RE: Greater Sage-Grouse Draft RMP Amendment & DEIS

Dear Sirs:

Please accept this correspondence as the vigorous support of the above Organizations for Alternative 1 of the Greater Sage Grouse Draft RMP Amendment and DEIS (“the Proposal”). The DEIS fails to provide even basic information necessary to make a meaningful comment and is often internally contradictory regarding the scope of analysis. After reviewing the Proposal, the Organizations are unable to answer basic generalized questions around the effort such as: “Why have previous management efforts been found unsuccessful so quickly?” Given the short time frame of this decision we must also ask how much of the previous management effort was even implemented. Additional foundational information addressing why the large scale revision of existing planning has been found necessary

simply are not meaningfully addressed, which only confounds basic understanding of the Proposal.

Our Organizations have partnered with the BLM for decades and provide hundreds of millions of dollars annually to support sustainable recreational opportunities on federal and state public lands across the nation. While this is an important partnership for our interests, we must question the agency value on this relationship as recreational usage simply is not even analyzed in the Proposal. This is concerning as the Proposal asserts recreation access is not an issue to be analyzed but then every specific topic or issue addresses recreation. The Organizations vigorously assert that recreation in all forms must be recognized and analyzed in the Proposal as it is mentioned 216 times in the first volume of the EIS. This simply has not happened as the Proposal asserts that recreational issues are outside the scope of the Proposal and the EIS provides a mere 2 pages of generalized discussion of recreational impacts from the Proposal. The Organizations simply cannot reconcile these positions in the Proposal.

This failure is immense when the Proposal is viewed in isolation. The failure exponentially expands when various outside requirements addressing recreational access are included in the scope of review. Analysis of how to improve recreational access and detailed examination of the economic contributions of recreational opportunities is required by President Biden's Executive Orders such as 14008 and 14057. Again, the Proposal omits any analysis of possible changes in the economic contributions from recreational activity in the planning area despite these requirements. The failure of the Proposal to meaningfully address recreational impacts and economic contributions from recreation to local communities is expanded when the newly released BLM 21st Century Outdoor Recreation Blueprint. While the BLM's 21st Century Recreation plan makes sweeping assertions of engagement and partnerships, none of these goals are addressed in the Proposal, despite the Proposal addressing an immense percentage of the lands managed by the BLM.

1. Who we are.

Before addressing the Organizations specific concerns regarding the Proposal, we believe a brief summary of each Organization is needed. The Off-Road Business Association ("ORBA") is a national not-for-profit trade association of motorized off-road related businesses formed to promote and preserve off-road recreation in an environmentally responsible manner.

One Voice is a non-profit national association committed to promoting the rights of motorized enthusiasts and improving advocacy in keeping public and private lands open for responsible recreation through strong leadership, advocacy, and collaboration. One Voice provides a unified voice for motorized recreation through a national platform that represents the diverse off-highway vehicle (OHV) community.

The United Snowmobile Alliance ("USA") is a nationally recognized 501 (c)(3) dedicated to the preservation and promotion of environmentally responsible organized snowmobiling and the creation of safe and sustainable snowmobiling in the United States.

United Four-Wheel Drive Association ("U4WD") is an international organization whose mission is to protect, promote, and provide 4x4 opportunities world-wide.

The Specialty Equipment Market Association ("SEMA") is a non-profit trade association that represents over 7,000 mostly small businesses around the country that manufacture, distribute, and retail specialty parts and accessories for motor vehicles. The industry employs over 1 million Americans and produces performance, functional, restoration and styling-enhancement products for use on passenger cars, trucks, SUVs, and special interest collector vehicles. SEMA members market products that enable automotive and off-road enthusiasts to personalize the style and upgrade the performance of their motor vehicles, including everything from classic cars to four-wheel drive vehicles to dedicated race cars.

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.

The Trail Preservation Alliance ("TPA") is an advocacy organization created to be a viable partner to public lands managers, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of motorized trail riding and multiple-use recreation. The TPA acts as an advocate for the sport and takes the necessary action to ensure that the USFS and BLM allocate a fair and equitable percentage of public lands access to diverse multiple-use trail recreational opportunities.

Colorado Snowmobile Association ("CSA") was founded in 1970 to unite 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.

The Colorado Off-Road Enterprise ("CORE") is a motorized action group dedicated to keeping motorized trails open in Central Colorado and the region.

The Idaho Recreation Council ("IRC") is a collaboration of Idaho recreation enthusiasts on the following activities: 4 x 4, Equestrian, Backcountry Aviators, Mountain Biking, Snowmobiles, Motorcycles, Rafts/Jet boats, ATV/UTV's, RVers, Recreational Miners, and Rock Hounds. The Idaho Recreation Council is comprised of Idahoans from all parts of the state with a wide spectrum of recreation interest and love for the future of Idaho and a desire

to preserve recreation for future generations of Idahoans. If you believe access is important to your recreation please consider joining a club in your area.

The Idaho State Snowmobile Association (“ISSA”) is a Not for Profit Organization dedicated to preserving, protecting, and promoting snowmobiling in the great state of Idaho. Our members may come from every corner of the state, but they all share one thing in common: their love for snowmobiling.

Nevada Off Road Association (“NVORA”) is a non-profit Corporation created for and by offroad riders. NVORA was formed to specifically fill the void between the government managers and the rest of us who actively recreate in the Silver State. NVORA does this by maintaining a consistent, durable, and respected relationship with all stakeholders while facilitating a cooperative environment amongst our community.

Ride with Respect (“RwR”) was founded in 2002 to conserve shared-use trails and their surroundings. RwR has educated visitors and performed over twenty-thousand hours of high-quality trail work on public lands. Over 750 individuals have contributed money or volunteered time to the organization. RwR and its contributors have spent several-hundred hours maintaining trails designated for motorized use in the planning area. We have promoted minimum-impact practices including the preservation of cultural sites given their nonrenewable nature and tremendous value to our nation, particularly to indigenous Americans.

Collectively, ORBA, U4Wd, One Voice, SEMA, TPA, CORE, CSA, IRC, ISSA, NVORA, RwR and COHVCO will be referred to as “The Organizations” for purposes of these comments.

2(a). Critical foundational information around the purpose and need for the Proposal is not provided.

The Organizations were active participants in previous landscape efforts around Sage Grouse management that led to significant management changes for the benefit of the Sage Grouse in 2015. It has also been our understanding that these previous management changes had significantly benefitted Sage Grouse populations and habitat was improving. After reviewing the Proposal, we are unable to identify the basis and need proposed for additional management changes for the Sage Grouse. Has the Sage Grouse population declined suddenly after these management changes? Is there a change in some other new environmental condition since the last management effort? We have reviewed the Proposal and been unable to identify significant new research on the Sage Grouse that has been released. Rather most of the Sage Grouse resources that are addressed predate the 2015 management decisions.

The Proposal provides the following summary of new Sage Grouse science that has been published and cites two surveys of research as the basis for the assertion of new data as follows:

“1.2.3 New GRSG Science

The GRSG planning processes have consistently been based on and informed by science. Since the 2015 and 2019 planning efforts, hundreds of peer-reviewed scientific publications on GRSG and management of their habitats have been published. Many of the BLM’s state and federal partners are significant contributors to this new science, and much of it is based on the data collected by state wildlife agencies. Some of these new publications are consistent with science that the BLM previously considered while others identify information not previously available. Several provide new spatial information on important population and habitat parameters for GRSG. The USGS has also compiled and summarized peer-reviewed journal articles, data products, and formal technical reports related to GRSG since January

2015 (Carter et. al., 2020, Teige, et. al., 2023). The BLM considers this new information and relevant science from our previous in developing and analyzing proposed management on BLM administered lands.”¹

The Organizations had the opportunity to review these reports and would question the accuracy of the summary provided in the Proposal. These are merely periodic surveys of possible publications on Sage Grouse from a variety of sources. The Carter work only cites 15 documents in total, and 11 of these documents (75%) are other DOI documents that are references to BLM and DOI decisions on site specific planning that is implementing the 2015 management decision on Sage Grouse. An example of this would be the USFWS findings made regarding the 2015 petition to possibly list the Sage Grouse. The Carter survey also references materials that are simply unrelated to any decision addressing the effectiveness of the 2015 management decisions such as:

Fundamental Science Practices Advisory Committee, 2011, U.S. Geological Survey Fundamental Science Practices: U.S. Geological Survey Circular 1367²

U.S. Department of the Interior, 2017, Report in response to secretarial order 3353: U.S. Department of the Interior, 15 p., accessed December 19, 2017³

We question how an outline of the implementation status of the 2015 management decision supports any conclusion that the 2015 planning effort needs to be reopened. This report shows the 2015 decisions have not been implemented on a large scale, which would support the decision to continue implementing the 2015 decisions rather than a significant change in management direction. We are unable to identify any work that is addressing new information or factors that might be impacting the sage grouse or even addresses the effectiveness of the 2015 standards.

¹ See, Proposal at pg. 1-4.

² See, Carter pg. 10.

³ See, Carter pg 11.

After a review of the Tiege work, the Organizations are forced to reach the similar conclusions regarding the need to reopen Sage Grouse planning as the Teige work references 30 documents on a wide range of issues. 10 publications are citing other BLM decisions or surveys which are implementing the 2015 management decisions, or 8 of which are addressing data obtained prior to implementing the 2015 standards. The survey further provides analysis of issues absolutely unrelated to a determination on the effectiveness of the 2015 Sage Grouse Management decisions such as the following citations:

Kleist, N.J., Willems, J.S., Bencin, H.L., Foster, A.C., McCall, L.E., Meineke, J.K., Poor, E.E., and Carter, S.K., 2022, Annotated bibliography of scientific research on pygmy rabbits published from 1990 to 2020: U.S. Geological Survey Open-File Report 2022–1003, 75 p., accessed August 22, 2022,⁴

Ooms, J., 2018, cld2—Google's Compact Language Detector 2, R package (ver. 1.2): R Project for Statistical Computing software release, accessed September 15, 2020, at <https://cran.r-project.org/web/packages/cld2/index.html>.⁵

Ooms, J., 2020, cld3—Google's Compact Language Detector 3, R package (ver. 1.3): R Project for Statistical Computing software release, accessed January 5, 2021, at <https://CRAN.R-project.org/package=cld3>.⁶

⁴ See, Teige pg. 10.

⁵ See, Teige pg. 11.

⁶ See, Teige pg. 11.

Westgate, M.J., 2019, revtools—An R package to support article screening for evidence synthesis: Research Synthesis Methods, v. 10, no. 4, p. 606–614, accessed February 11, 2021,⁷

The Proposal makes generalized assertions of the need for new planning based on publications of information around the Greater Sage Grouse that have occurred since the 2015 efforts. These generalized assertions are not supported by the information provided in any manner as many of these publications are referencing data obtain before the 2015 management changes or are addressing other species or are on items unrelated to management of any species at all. While the authority on the various database protocols and evidence screening methodology may be relevant to the survey process and may be relevant or interesting to Sage Grouse researchers, we are unable to indemnify any legal basis to reopen planning based on generalized research being published. This type of publishing happens all the time on many issues with no response at all from planners. Why would these publications be treated any different?

As further detailed later in these comments, publication of economic analysis around recreational economic contributions on BLM lands has skyrocketed in the last decade and this is simply omitted from analysis. The annual Department of Commerce works would be an example of the large amounts of new information being published on this issue as this information was only in its infancy when the final Sage Grouse management decisions were previously made in 2015. Clearly the mere publication of information is not the threshold.

2b. The Proposal asserts management threshold triggers were exceeded but provides no explanation of how this determination was made.

The Proposal simply asserts that 16 monitoring triggers have been exceeded in the previous Sage Grouse planning documents, but provides no meaningful discussion of what these

⁷ See, Teige pg. 11.

management threshold triggers were or what factors might have caused the management threshold trigger levels to be exceeded. In a perplexing development at other points in the Proposal, it is asserted that 42 monitoring triggers were exceeded.⁸ How can there be such a range of management threshold triggers being exceeded? Are the events causing the management threshold trigger to be exceeded natural events, such as fire or drought? Manmade events? Was there some new environmental factor that was only recognized since the last planning effort? How does a localized management threshold trigger point being exceeded relate to the landscape scale of planning? Was the particular management threshold trigger exceeded everywhere in the planning area? Were certain management threshold triggers exceeded in certain locations? If so, what management threshold triggers were exceeded in what locations for how long? Again, this is basic information that is critical to the process. These were also foundational decisions for the planning process that appear to have been entirely omitted from this effort. Without information such as this, how can the public confirm we are all addressing the same issues or that the planning effort even has a common starting point.

Even when there is information provided on what the management threshold trigger is that was exceeded the information is simply insufficient to answer basic questions. The Proposal makes a passing reference that wildfires may have contributed to management threshold triggers being exceeded as follows:

“Sixteen adaptive management habitat triggers were tripped between 2015 – 2020, mostly the result of sagebrush loss to wildfires.”⁹

This type of analysis immediately creates questions such as why would we reopen all planning due to localized impacts of wildfire? Why would issues like Sage Grouse habitat restoration not be addressed in post fire management efforts, like a burned area response

⁸ See, Proposal at pg. 1-3.

⁹ See, Proposal at pg. 1-3.

(“BAER”) effort? Had these areas been mitigated? It is beyond argument that wildfires are getting more severe and that in several years following the 2015 management revisions the Western United States has had bad fire years. Clearly the Proposal is not asserting that wildfires must reduce in scope and scale to avoid further management actions on Sage Grouse. Again, these are basic questions that must be addressed on the local level before making the decision to reopen a multi-state planning effort.

The inclusion of highly localized factors as the basis to reopen the previous landscape planning efforts still creates further questions about the purpose and need for the effort. What percentage of these areas was managed in compliance with range standards previously proposed? How much of the planning area had been subject to any implementation efforts at all? How was the timeframe between this planning effort and the close of previous planning efforts determined to be the appropriate timeframe to determine the success or failure of these management efforts?

This brings the Organizations to our first question on this Proposal. “What is the problem?” and secondly “How do we define success of any management effort?” We are unsure how to meaningfully address the Proposal without this type of information. We are also concerned that this unsupported decision-making process for the protection of species sets a VERY bad precedent that will undermine species protection efforts in the future. The Proposal appears to assert that since some portion of sage grouse habitat was impacted by wildfire and various publications about sage grouse were made, planning revisions are now needed. This is a terrible precedent for the basis of any planning as this basis could continue almost infinitely. Without the ability to define success and address the problem that is to be resolved, this will allow planning efforts to arbitrarily be reopened. This is exactly the situation that NEPA was put in place to avoid. The highly arbitrary basis for planning to be reopened will also be a barrier to implementation as managers will not want to implement any decision that could simply alter direction next year and be deprioritized or even found to be a threat to the species.

3. Recreation in all forms must be addressed in the Proposal or entirely removed from analysis.

The Organizations were simply shocked at the scale of conflicting guidance that is given in the Proposal regarding possible recreational concerns to the Sage Grouse populations and impacts to recreational access and usage that could result from Sage Grouse management decisions. The Proposal begins by asserting that Recreational access and travel management will be addressed as follows:

“ES.3.1 Issues Retained for Further Consideration in this RMPA/EIS

The following resource topics identified during public scoping are being carried forward for further analysis in this RMP Amendment/EIS.

- Special status species (including GRSG)
- Fish and wildlife
- Air resources and climate
- Soil resources
- Water resources
- Vegetation, including riparian areas and wetlands
- Wild horses and burros
- Cultural resources
- Lands with wilderness characteristics
- Wildland fire ecology
- Livestock grazing
- Recreation
- Travel and transportation
- Mineral resources
- Lands and realty
- Areas of Critical Environmental Concern (ACECs)
- Tribal interests
- Social and economic conditions, including environmental justice”¹⁰

This asserted scope of the Proposal on recreational and travel analysis was immediately contradicted in introductory provisions of the Proposal where the initial assertion that recreation and travel management was reversed as follows:

¹⁰ See, Proposal at pg. ES-3.

How should recreation and travel be managed to protect GRSG and sagebrush habitat?

Recommendations for recreation and travel management received during public scoping are either already in the existing RMP language from 2015 and 2019, or are not RMP-level decisions (e.g., guidance on site-specific route designations, recommended route densities, limitations on dispersed recreation). Because such actions would be consistent with existing management or are not applicable at the RMP-level, no changes in RMP management actions need to be considered.¹¹

The Proposals assertion that recreation and travel management are outside the scoped of analysis simply does not align with the analysis in the Proposal, as in the first volume of the EIS alone recreational usage is addressed 216 times. These two situations simply cannot be reconciled. If the desire is to avoid impacts to recreational access in the Proposal, this analysis and conclusion must be far more directly and clearly stated. If the Proposal is addressing recreation and travel management, as is evidenced by the 216 references to recreation in the first volume of the EIS, the Proposal needs to do this in a manner that complies with NEPA. This simply has not occurred either as the recreational and travel management portions of the Proposal span a mere two pages and no economic analysis for recreation is even mentioned.

Even if the exclusion of recreation and travel management from the Proposal analysis noted above is asserted to be precise, the summary of BLM planning efforts simply fails to reflect the diversity of BLM plans and age on the landscape. This decision also leaves an immense ambiguity in the possible protection of recreational access simply based on the limited date

¹¹ See, Proposal at pg. 1-10.

range of BLM RMP that are reviewed for recreational standards. While the Proposal starts analysis from 2015, we are aware of many RMP in various habitat areas that are FAR older than 2015. As an example, the Big Desert BLM planning area in Idaho is still operating on a management framework plan approved in 1981. As a result, we are unable to identify the relationship of this effort to those areas. This type of ambiguity is simply insufficient to comply with NEPA requirements.

The Proposal failure to meaningfully address recreation, despite the fact it is mentioned 216 times in the first volume of the EIS alone, is problematic. The current determination that recreational access is outside the scope of the Proposal is simply never explained or reconciled to the fact recreational issues are raised throughout the Proposal when addressing specific concerns. While no analysis of possible recreational impacts and travel management decisions are provided in the two pages of analysis provided¹², these types of concerns are woven throughout the Proposal. Again, this is an immense problem as many standards directly reference recreation and possible relationships of recreation and sage grouse. This is simply insufficient to support any assertion of NEPA sufficiency.

4. Executive Orders issued by President Biden specifically requiring economic analysis of agency actions and expansion of recreational opportunities have not been addressed in the Proposal.

The Organizations are vigorously opposed to the Proposal assertion that recreation and travel are outside the scope of analysis of the Proposal, which simply cannot be reconciled with the analysis provided. This assertion will not protect recreational access but rather compound impacts as no analysis of possible impacts of management decisions has been provided. Rather this failure to provide meaningful guidance will result in steps being taken to restrict recreation for almost any possible basis in future site specific planning with the mere assertion it is benefitting Sage Grouse. There will simply be nothing to rebut this assertion in the Plan. Our

¹² See, Proposal §3.19 & 3.20

concerns around the systemic failure to address recreational values for landscapes is further compounded when the various protections and analysis required by several Executive Orders from President Biden are reviewed. The Organizations would note that Executive Orders (“EO”) 14008 and 14057 simply are not referenced in the Proposal despite these Executive Orders being issued by President Biden.

The Proposal provides no meaningful discussion of how compliance with various standards in Eos was determined and this is in stark contrast to the analysis required for these Executive Orders as they mirror many of the sentiments raised in the Proclamation. A full review and analysis of the various components of EO 14008 is critical to bringing balance to public lands and the Proposal is critical as there are three times recreational access and economic benefits of recreation are identified for improvement is specified in EO 14008.

§214 of EO 14008 clearly mandates improved recreational access to public lands through management as follows:

“It is the policy of my Administration to put a new generation of Americans to work conserving our public lands and waters. The Federal Government must protect America’s natural treasures, increase reforestation, **improve access to recreation**, and increase resilience to wildfires and storms, while creating well-paying union jobs for more Americans, including more opportunities for women and people of color in occupations where they are underrepresented.”¹³

The clear and concise mandate of the EO to improve recreational access to public lands is again repeated in §215 of the EO as follows:

“The initiative shall aim to conserve and restore public lands and waters, bolster community resilience, increase reforestation, increase carbon sequestration in

¹³ See, President Joe Biden, Executive Order 14008; 86 Fed Reg 7619 At pg. 7626 (2021)

the agricultural sector, protect biodiversity, **improve access to recreation**, and address the changing climate.”¹⁴

§217 of EO 14008 also clearly requires improvement of economic contributions from recreation on public lands as follows:

“Plugging leaks in oil and gas wells and reclaiming abandoned mine land can create well-paying union jobs in coal, oil, and gas communities while restoring natural assets, **revitalizing recreation economies**, and curbing methane emissions.”¹⁵

Our position is the Proposal violates the mandate of 14008 to address recreational access and economic benefits of recreation to local communities. This must be corrected and addressed in the Proposal with required analysis and protections for recreational access. The Proposals’ complete failure to address similar Executive Orders is not limited to a failure to address compliance with EO 14008 but extend to EO 14057 issued by President Biden on December 13, 2021. The immediate concern over the failure to address Executive Order 14057 is again apparent when EO 14057 is actually reviewed. EO 14057 starts with this general statement of purpose:

“In responding to this crisis, we have a once-in-a-generation economic opportunity to create and sustain jobs, including well-paying union jobs; support a just transition to a more sustainable economy for American workers; strengthen America’s communities;”¹⁶

EO 14057 has repeated and specific requirements to address economic contributions and impacts from agency actions as follows:

¹⁴ See, EO 14008 at pg. 7627.

¹⁵ See, EO 14008 at pg. 7628

¹⁶ See, President Joseph Biden; Executive Order 14057; 86 Fed Reg. 70935(2021).

“c) reform agency policies and funding programs that are maladaptive to climate change and increase the vulnerability of communities, natural or built systems, economic sectors, and natural resources to climate impacts, or related risks; and”¹⁷

EO 14057 specifically addresses the need for incorporation of economic contribution in agency actions to create or improve sustainability of both the agency actions and management decisions. Again, the Organizations are unable to identify any attempt to outline how these requirements were complied with in the development of the Proposal as there is no discussion of how the asserted compliance was determined.

5(a). Economic analysis is identified as an important characteristic in NEPA analysis.

It is well established that economic impacts and contributions from all multiple uses are an important factor required to be addressed in the NEPA process. Despite this legal requirement of NEPA analysis being of heightened importance for recreational activities in several Executive Orders, the Proposal falls woefully short of a legally sufficient legal analysis of this issue and well short of the analysis of an issue identified as an important sector of the planning area community.

Economic contribution calculations are often complex and involve a balance of numerous factors that directly impact the spending habits of those sought to be studied, and often involve far more analysis and discussion than planning for other issues. The basic complexity of any economic determinations and the size of the calculations to be made are summarized by the Western Governors Association’s recreational economic contributions study as follows:

¹⁷ See, EO 14057 at pg. 70938.

"How is "economic impact" calculated? Many people might think of a consumer buying equipment – a tent, fishing pole, ATV, bicycle, boat, snowboard or rifle. However, the impact is much more complex than the manufacture and sale of gear and vehicles. Gas stations, restaurants, hotels, river guides and ski resorts benefit from outdoor recreation. In total, equipment and travel expenditures represent billions in direct sales that create jobs, income, tax revenues and other economic benefits."¹⁸

The complexity of the calculations undertaken for economic impact calculations is immediately evidenced by the sheer number of pages required in most economic impact reports, as the explanation of the analysis process used to arrive at any final figure of any economic contribution analysis is often as valuable as the total economic contribution that is reached. Given the complexity of the process, we must question how the decision was made to provide no economic analysis of contributions from recreation and how these could be impacted by additional management restrictions was made in the Proposal.

5(b) Proper integration of economic information in the planning process is an ongoing issue in federal planning.

The proper integration of accurate economic information is often a weakness of the public land planning process in the Western United States, which has resulted in the creation of many other longer-term problems when decisions reflecting an imbalanced multiple uses are implemented. The Organizations submit that the failure of many planning efforts to accurately address economic impacts and contributions was a concern addressed around the development of previous Sage Grouse planning efforts. The Western Governors Association released its *Get Out West* report in conjunction with its economic impact study

¹⁸ See Western Governors Association report; *A snapshot of the Economic Impact of Outdoor Recreation*; prepared by Southwick and Associates; July 2012 at pg. 1.

of recreation on public lands in the Western United States which specifically identified that proper valuation is a significant management concern as follows:

"Several managers stated that one of the biggest challenges they face is “the undervaluation of outdoor recreation” relative to other land uses.”¹⁹

The *Get Out West* report from the Western Governors' Association also highlighted how critical proper valuation of recreation is to the development of good management plans based on multiple use principals. The *Get Out West* report specifically found:

"Good planning not only results in better recreation opportunities, it also helps address and avoid major management challenges – such as limited funding, changing recreation types, user conflicts, and degradation of the assets. Managers with the most successfully managed recreation assets emphasized that they planned early and often. They assessed their opportunities and constraints, prioritized their assets, and defined visions.”²⁰

The Organizations believe our concerns regarding the Proposal and those expressed in the Western Governor's *Get Out West* report virtually mirror each other. This concern must be addressed prior to finalizing the Proposal in order to avoid increases to many other management issues that were sought to be minimized with the creation. There can simply be no factual argument made that recreation has not been significantly undervalued in the Proposal and this has directed the range of alternatives provided for multiple use recreation in the planning area.

5(c) Accurate analysis of economic impacts from planning is an exceptionally complex task to be addressed in every phase of planning.

¹⁹ See, Western Governors Association; *Get out West Report; Managing the Regions Recreational Assets*; June 2012 at pg.. 3.

²⁰ See, *Get Out West Report* at pg. 5.

As noted in the Western Governors' *Get Out West* report, public lands are a major economic driver for many Western communities that are often completely surrounded by large tracts of public lands. Usage of these public lands takes a variety of forms, but the largest user of public lands throughout the West is the recreational user. To ensure economic contributions of public lands to local communities and western states, relevant federal statutes and BLM planning documents implementing these statutes explicitly require economics to be addressed in **every** stage of the planning process. The BLM handbook requires planners to document economic methods in two stages before the releasing draft alternatives. The Organizations believe these mandates simply have not been complied with in the development of the Proposal and will result in long term increases in user conflicts and degradation of assets and economic contributions, all of which are identified as priority concerns in several Executive Orders and NEPA.

The basic mandate to include documented economic analysis early in the interdisciplinary team process for public lands planning is provided by the Federal Lands Planning and Management Act ("FLPMA). FLPMA specifies the various criteria that must be incorporated at specific times in the development of a land use plan as follows:

“(c) In the development and revision of land use plans, the Secretary shall–
(2) use a systematic interdisciplinary approach to achieve integrated consideration of physical, biological, economic, and other sciences;...”²¹

The basic mandate of FLPMA regarding the critical need for documented economic analysis is more specifically and extensively addressed in Appendix D of the BLM's Land Use Planning Handbook. Appendix D opens as follows:

"A. The Planning Process

²¹ 43 U.S.C. §1712

To be effective, social scientific data and methods should be integrated into the entire planning process, from preparing the pre-plan to implementation and monitoring. The main social science activities for the various planning steps are outlined in Table D-1.

Table D-1.—*Social science activities in land use planning*

<u>Planning steps</u>	<u>Social science activities</u>
Steps 1 & 2—Identify Issues and Develop Planning Criteria	<ul style="list-style-type: none"> ▪ Identify publics and strategies to reach them ▪ Identify social and economic issues ▪ Identify social and economic planning criteria
Step 3—Inventory Data	<ul style="list-style-type: none"> ▪ Identify inventory methods ▪ Collect necessary social and economic data
Steps 4—Analyze Management Situation	<ul style="list-style-type: none"> ▪ Conduct social and economic assessment, including existing conditions and trends and the impacts of continuing current management ▪ Document assessment methods in an appendix or technical supplement
Step 5—Formulate Alternatives	<ul style="list-style-type: none"> ▪ Identify social and economic opportunities and constraints to help formulate alternatives
Step 6—Estimate Effects of Alternatives	<ul style="list-style-type: none"> ▪ Identify analysis methods ▪ Analyze the social and economic effects of the alternatives

Steps 7 & 8—Identify Preferred
Alternative and Finalize Plan

Step 9—Monitor and Evaluate

- Document impact analysis methods in an appendix or technical supplement
- Assess mitigation opportunities to enhance alternatives’ positive effects and minimize their negative effects
- Identify potential social and economic factors to help select the preferred alternative
- Track social and economic indicators"²²

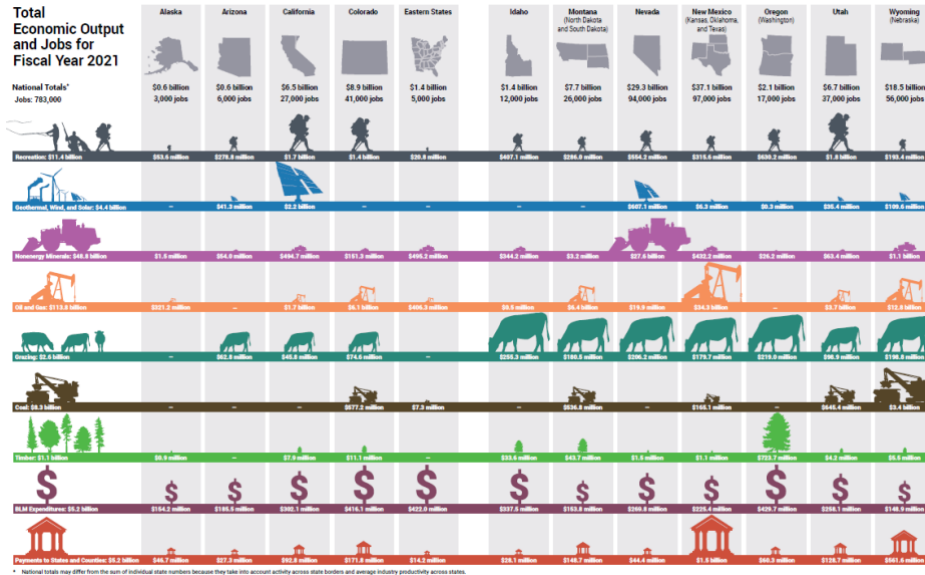
The Organizations must note that economic concerns are the only factor that is addressed in every step of the planning process laid out in the BLM planning handbook. Documentation of economic forecasts and analysis methodology is required in two separate stages before release of draft alternatives. The required documentation of these concerns is exactly the information the Organizations seek to review but cannot review in the Proposal as required as the information provided is simply not provided for recreation.

5(d) The Proposal fails to recognize the immense contributions of recreational activity in the planning area identified by other planning agencies.

The Proposal provides what appears to be a reasonable analysis of many activities that could be negatively impacted by the new management standards, making the Proposals silence on recreational impacts only that much more vivid. This silence is only compounded when the consistent recognition of the economic importance of recreational opportunities on BLM lands is addressed. For the last several years the BLM has provided their “BLM A

²² See, BLM LUP Handbook H-1601-1 at Appendix D pg. 2. Emphasis added.

sound investment for America” in 2022 brochure, which we believe is an important resource for managers and partners.²³ This brochure provides a highly detailed breakdown of the economic importance of recreation on BLM lands as recreation is the primary economic contributor to communities in almost every state BLM owns lands in, which is reflected in the following chart:



The 2022 BLM Sound Investment analysis further provides the following summary of the economic importance of recreation to local communities as follows:

RECREATION: More than 99 percent of BLM-managed lands are available for recreation at no fee to visitors. Lands used for recreational activities attract visitor spending and contribute significantly to local economies. In FY 2021, BLM-managed lands received more than 80 million recreation-related visits, an increase of about 10 percent over the previous year.²⁴

²³ A complete copy of this report is attached as Exhibit “1” of these comments.

²⁴ See, Sound investment strategy brochure at pg. 2.

The immediate conflict between these two positions being taken by the BLM cannot be overlooked.

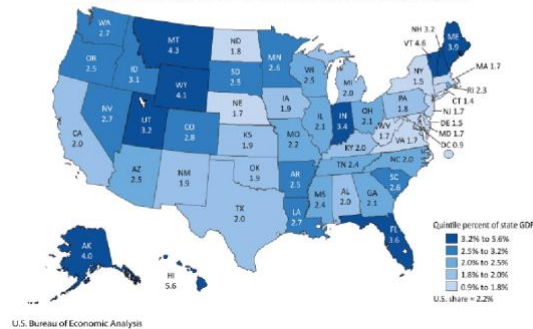
The economic importance of recreation to western states was also recognized by the US Department of Commerce in their annual Outdoor Recreation Satellite Account on the issue.²⁵ The summary highlights the immense percentage of GDP that recreation provides to western states as follows:

Outdoor Recreation Satellite Account, U.S. and States, 2022

New Statistics for 2022; Updates for 2017–2021

The U.S. Bureau of Economic Analysis (BEA) released statistics today measuring the outdoor recreation economy for the nation, all 50 states, and the District of Columbia. The new U.S. data show that the value added of the outdoor recreation economy accounted for 2.2 percent (\$563.7 billion) of current-dollar gross domestic product (GDP) for the nation in 2022 (national table 1). At the state level, value added for outdoor recreation as a share of state GDP ranged from 5.6 percent in Hawaii to 1.4 percent in Connecticut. The share was 0.9 percent in the District of Columbia (state table 1).

State Outdoor Recreation Value Added as a Percent of State GDP, 2022



The Department of Commerce also provides a highly detailed annual report and breakdown of the specific benefits to each state from outdoor recreation. A copy of this report is attached as Exhibit “3” to these comments. The USFS also has recognized the immense value of multiple use recreational opportunities on their lands in the most recent economic analysis conducted with their National Visitor Use Monitoring efforts. A copy of this report is attached as Exhibit “4” to these comments. The Colorado Off-Highway Vehicle Coalition has partnered for decades with the USFS, BLM and Colorado Parks and Wildlife to provide high quality economic data for motorized recreation in the state of Colorado. COHVCO recently updated this research and released a detailed analysis of these conclusions and process for use in planning. A copy of this work is attached as Exhibit “5” to these comments.

²⁵ A copy of the Dept of Commerce 2022 National Report on recreational activity is attached as Exhibit “3” to these comments.

The Organizations are deeply concerned that the Proposal provides no guidance on how these proposed Alternatives could impact recreational economic contributions, despite numerous Executive Orders, NEPA requirements and high quality detailed information being provided from partner agencies on this issue. For this reason alone the Organizations are unable to support any Alternative other than Alternative A of the Proposal.

6. The BLM Blueprint for 21st Century Outdoor Recreation strategy has simply been ignored in this effort.

The Organizations have been engaged in recent efforts of the BLM around their 21st Century Recreation Strategy, including attending public meetings in Las Vegas and Washington DC last year. Our efforts have also included numerous rounds of comments and meetings with a wide range of BLM staff. These have been significant efforts on our part that we have undertaken in good faith in an attempt to understand the challenges facing the BLM as a result of decades of budget cuts and staffing challenges. In these meetings and comments, we have voice significant concerns about the failure of various planning efforts to meaningfully integrate various efforts, which appear to the public, to be occurring largely in isolation from each other. We have been consistently informed that the new recreation strategy would start to address these types of concerns. After reviewing the Proposal, we are unable to identify any integration of various issue specific efforts into the larger vision reflected in the recreation Strategy.

Given the scale of the Proposal and of the 21st Century Recreation Blueprint, we would have expected this effort to be mentioned in the Proposal and meaningfully discussed as this would send a strong message to recreational partners such as ourselves that in many areas are now entirely providing all funding to the BLM for staffing and recreational projects. Rather than proactively identifying the relationship of the two efforts, the silence on this issue also sends a strong message and it is not positive about the value of these partnerships.

Our frustration with the failure to meaningfully address recreation in planning is compounded when the Executive Summary of the BLM’s 21st Century Recreation Blueprint is reviewed. This Executive Summary provides as follows:

“Executive Summary

The Bureau of Land Management (BLM) is developing a “Blueprint for 21st Century Outdoor Recreation” (Blueprint) intended to guide investments, partnerships, outreach, and program development to respond to current demand and chart a course to meet future needs.

The Blueprint presents several major shifts in how the agency prioritizes and supports outdoor recreation. The BLM is committed to durable change, which means it must work closely with communities and partners to respond to varying recreation opportunities and pressures and seek continuous program improvements. Another principle of change is a shift from reactive recreation management to a proactive approach, enabling planning to consider sustainable resource management needs. Importantly, the Blueprint advances the “U.S. Department of the Interior Equity Action Plan” and builds on prior work through the “Connecting with Communities: BLM Recreation Strategy,” offering a new path forward that promotes equitable access to outdoor recreation opportunities, while conserving, protecting, and enhancing BLM’s one-of-a-kind resources and experiences.

As part of this Blueprint, BLM has established a new vision to proactively manage for exceptional and one-of-a-kind recreational experiences that invite all to share in the enjoyment and stewardship of their public lands and waters. The Blueprint vision includes four strategic pillars. Each pillar outlines desired outcomes, core strategies, and partnership success stories. The BLM believes these pillars will serve as the foundation for successful recreation management in the 21st century.

The Four Strategic Pillars are:

1. Grow and Diversify Resources for BLM Recreation

2. Prioritize and Embrace Partnerships
3. Expand Outreach and Establish a Culture of Inclusion
4. Meet the Demand, Protect Resources, and Improve Access”²⁶

The overlap between the stated mission of this information and the information we are seeking in this Proposal cannot be overlooked. While the Proposal seeks to reopen Sage Grouse management as some percentage of management triggers are exceeded and various publications on Sage Grouse were made, the 21st Century Recreation Blueprint has been ignored in both letter and spirit despite 100% of the goals being exceeded in the Proposal. Even more frustrating is the fact we are unable to identify a single step that has been taken in furtherance of these goals or a single planning effort where this document has been taken into account.

7. Conclusion.

The Organizations are forced to support Alternative 1 of the Proposal and vigorously oppose each of the other Alternatives. The DEIS fails to provide even basic information necessary to make a meaningful comment and is often internally contradictory regarding the scope of analysis. After reviewing the Proposal, the Organizations are unable to answer basic generalized questions around the effort such as: “Why have previous management efforts been found unsuccessful so quickly?” Given the short time frame of this decision we must also ask how much of the previous management effort was even implemented. Additional foundational information addressing why the large-scale revision of existing planning has been found necessary simply are not meaningful addressed, which only confounds basic understanding of the Proposal.

Our Organizations have partnered with the BLM for decades and provide hundreds of millions annually to support sustainable recreational opportunities on federal and state public lands across the nation. While this is an important partnership for our interests,

²⁶ See, DOI , BLM *Blueprint for 21st Century Outdoor Recreation*; August 2023 at pg. 1.

recreational usage simply is not even analyzed in the Proposal. This is concerning as the Proposal asserts recreation access is not an issue to be analyzed but then every specific topic or issue addresses recreation. The Organizations vigorously assert that recreation in all forms must be recognized and analyzed in the Proposal as it is mentioned 216 times in the first volume of the EIS. This simply has not happened as the Proposal asserts that recreational issues are outside the scope of the Proposal and the EIS provides a mere 2 pages of generalized discussion of recreational impacts from the Proposal. The Organizations simply cannot reconcile these positions in the Proposal. Analysis of how to improve recreational access and detailed examination of the economic contributions of recreational opportunities is required by President Biden's Executive Orders such as 14008 and 14057. Again, the Proposal omits any analysis of possible changes in the economic contributions from recreational activity in the planning area despite these requirements.

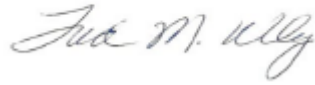
The failure of the Proposal to meaningfully address recreational impacts and economic contributions from recreation to local communities is expanded when the newly released BLM 21st Century Outdoor Recreation Blueprint. While the BLMs 21st Century Recreation plan makes sweeping assertions of engagement and partnerships, none of these goals are addressed in the Proposal, despite the Proposal addressing an immense percentage of the lands managed by the BLM.

The Organizations would welcome discussions on development of an Alternative that provided high quality recreational opportunities and protected other values as well. This type of alternative could be developed largely based on existing management. If you have questions, please feel free to contact Scott Jones, Esq. (518-281-5810 / scott.jones46@yahoo.com) or Fred Wiley (661-805-1393/ fwiley@orba.biz).

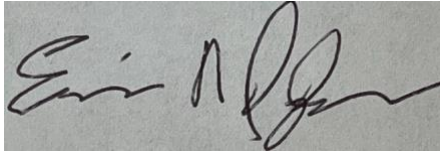
Respectfully Submitted,



Scott Jones, Esq.
COHVCO, USA
Authorized Representative



Fred Wiley
ORBA President and CEO



Eric Snyder
Manager- Government Affairs
SEMA



Edward Calhoun
President
Colorado Snowmobile Association



Chad Hixon
TPA Executive Director



Marcus Trusty
Chairman- One Voice
President – CORE



Sandra Mitchell
IRC Executive Director
ISSA Authorized Rep.



Steve Egbert,
Chair- United 4 Wheel Drive Assoc.



Matthew Giltner
Chairman
Nevada Off-Road Assoc



Clif Koontz
Executive Director
Ride With Respect