OUTDOOR ALLIANCE

May 25, 2016

Director (630)
Bureau of Land Management
U.S. Department of the Interior
1849 C Street, N.W., Room 2134LM
Washington, DC 20240
Attention: 1004-AE39

Re: BLM Planning 2.0 proposed regulations

Dear Planning 2.0 team,

Outdoor Alliance is a coalition of seven member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, the Mountaineers, and the American Alpine Club and represents the interests of the millions of Americans who climb, paddle, mountain bike, and backcountry ski and snowshoe on our nation's public lands, waters, and snowscapes. Collectively, our members recreate on lands managed by BLM across the country, and have a deep and personal interest in the management of these areas.

BLM manages some of the most iconic locations in the country for active outdoor recreation, and in addition to being high quality, these resources are widespread and diverse. The map below depicts the extent of human powered recreation resources for paddlers, mountain bikers, and climbers across BLM lands, with blue areas representing the locations of trails, climbing areas, and river segments on the yellow background of BLM land.

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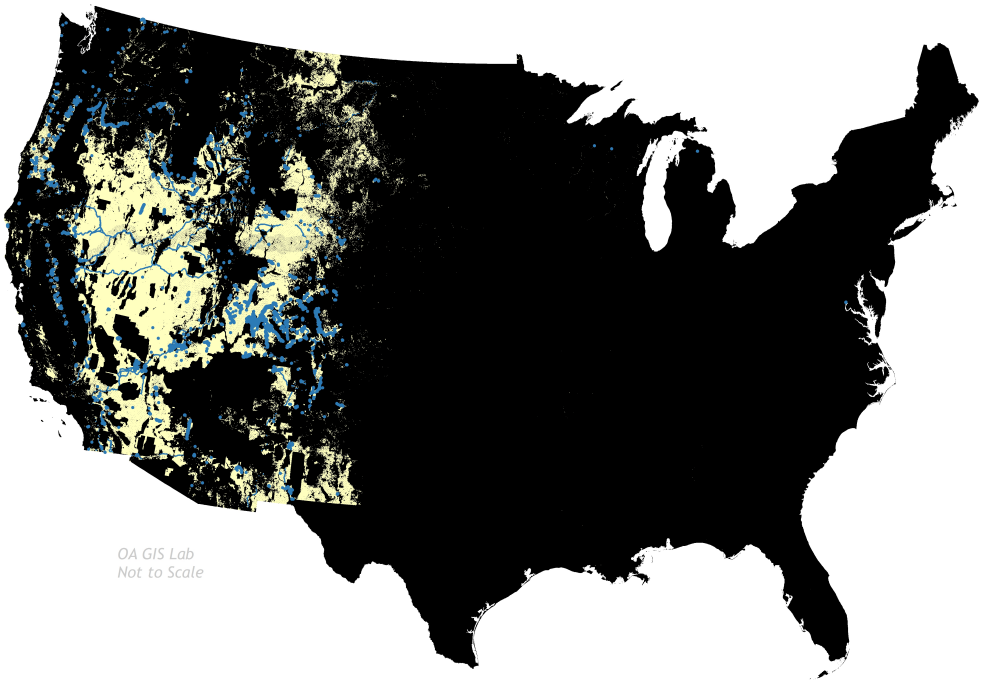

Outdoor Alliance supports BLM in its efforts to modernize the land management planning process, and particularly commends agency efforts to ensure robust public involvement in resource management plan (RMP) development. Additionally, we appreciate BLM's actions to include public input in the Planning 2.0 development process. A prior submission from Outdoor Alliance is included as an appendix and incorporated by reference into these comments.

As outlined in greater detail below, Outdoor Alliance requests the following revisions to the proposed rule:

- Enhance support for landscape level planning by clarifying that planning efforts will not default to state, district, or field office boundaries;
- Require consideration of the need for Master Leasing Plans during the planning assessment phase;

- Continue building on the ePlanning platform to support broader and more geographically dispersed stakeholder engagement and support the exchange of GIS data;
- Provide greater clarity on the distinction between plan components and implementation strategies;
- Develop a multi-tiered approach to implementation strategies and provide greater public involvement opportunities for more complex implantation strategy changes;
- More explicitly connect changes in implementation strategies with adaptive management frameworks to ensure durability of RMPs;
- Issue proposed implementation strategies developed as part of the RMP process earlier and provide opportunities for public review and comment;
- Explicitly require that planning designations be supported by resource use determinations and management measures to ensure prioritized values are protected;
- Maintain planning assessment requirements for EIS-level amendments, and require that responsible officials solicit public input regarding the potential need for a planning assessment before the requirement may be waived;
- Clarify "high quality information" standards and make clear that popular sources of information, although sometimes affiliated with advocacy organizations, generally fit within this definition;
- Require responsible officials to make collected information public alongside a rationale for the acceptance or rejection of information sources;
- Expand the planning assessment collection of information regarding existing designations to include the potential need for new designations; and
- Exclude "suitability" determinations for potential Wild & Scenic Rivers from the planning process.

Thematic changes

1. Landscape-level planning

Outdoor Alliance is appreciative of BLM's growing emphasis on landscape-level planning. We support the change in terminology to make clear that "deciding officials" and "responsible officials" need not be Field Managers or State directors, respectively. BLM can and should go further, however, by emphasizing that planning areas should not default to traditional planning boundaries, but should rather be based on ecological and social conditions on the landscape. BLM could facilitate this enhanced emphasis by adding a section into § 1610.1-1 stating that planning units will be based on social and landscape considerations and will not default to state, district, or field office boundaries.

Additionally, Outdoor Alliance strongly supports the shift toward addressing landscape-scale issues arising from oil and gas leasing through the use of Master Leasing Plans (MLPs), and BLM should emphasize that MLPs are the preferred mechanism for addressing landscape-scale issues arising from oil and gas development. BLM could advance the use of these successful planning efforts by requiring consideration of the potential utility of an MLP during the planning assessment under § 1610.4(c).

2. Public participation and ePlanning

In general, Outdoor Alliance strongly commends BLM for its efforts toward increased, front-loaded public participation opportunities in the planning process. Information gathering efforts and public review opportunities are important investments in the ultimate efficiency of planning and in the quality of RMPs generated. In addition to the new planning assessment phase, discussed in greater detail below, we strongly support the proposed rule's provision to provide for public review of preliminary alternatives prior to the release of the DEIS and draft RMP.[1]

Outdoor Alliance appreciates BLM's commitment to completing the transition to its ePlanning platform. In general, we are hopeful that this step will enhance opportunities for information sharing between BLM and public lands stakeholders. Members of the outdoor recreation community often travel long distances to enjoy public lands, and BLM lands will often have passionate and knowledgeable stakeholders who may be physically remote from the landscape. A successful transition to the ePlanning platform, we hope, will include an emphasis on making public engagement opportunities more available to more geographically dispersed public lands stakeholders who, despite their remoteness, still have very important contributions to make to the planning process. We note, as well, the growing importance of GIS resources in the planning process, and we encourage BLM to continue taking steps forward in enhancing its ability to both share and accept GIS data.

Structural provisions

1. Plan components and implementation strategies

Outdoor Alliance is generally supportive of the concept of distinguishing plan components from implementation strategies. We are concerned, however, by the lack of clarity regarding the types of actions which would constitute implementation strategies

[1] Proposed rule § 1610.5-2(c)

and the abbreviated public participation process for implementation strategy changes, particularly during RMP development.

As described in the rulemaking, management measures which would be included as implementation strategies could include steps as complex as identifying the need to prepare travel management plans, and are likely to include management activities with the potential to directly affect recreational users. While there may be a need to facilitate adaptive management by allowing greater flexibility in implementation strategies, a number of steps may be necessary to ensure adequate public participation in management decisions.

First, BLM should consider tiering implementation strategies into two categories based on the complexity or impact of the proposed measures in order to provide greater opportunities for public engagement for more complex actions. While many of these actions are likely to require site-specific NEPA analysis, providing more robust, up-front public participation will help BLM realize the same efficiencies derived from public information gathering and stakeholder buy-in that are likely to be generated through more up-front involvement in other planning stages. At minimum, BLM should provide for a more substantive public process than the 30-day review period currently proposed.

Second, BLM should commit to a more explicit connection between changes in implementation strategies and adaptive management frameworks embodied in plan components. While the ability to make necessary course corrections in implementation strategies efficiently is important, these changes must be tied to clear adaptive management standards, or the planning exercise itself loses meaning.

Third, under §1610.5-5(b) of the proposed rule, no proposed implementation strategies would be made public until publication of the proposed RMP and Final EIS. In order to provide meaningful public participation in the development and review of implementation strategies, proposed implementation strategies should be made available at the draft RMP stage. This opportunity for more robust public involvement in the development of implementation strategies is particularly critical for the initial set of implementation strategies purposed under a newly revised RMP, and review of the strategies which tier off of plan components will additionally facilitate a clearer public understanding of plan components under review.

2. Plan components: designations

§ 1610.1-2(b)(1) of the proposed rule identifies “designations,” including planning designations, as “areas of public land where management is directed toward one or more priority resource values or uses.” Outdoor Alliance supports the use of planning

designations to identify areas that deserve priority management for outdoor recreation or other values, as appropriate. We are concerned, however, by the lack of a requirement to explicitly connect priorities identified through designations with resource use determinations, management measures, or other steps to ensure that values prioritized through designations are in fact protected on the landscape.

Currently, for example, Special Recreation Management Area or Extensive Recreation Management Area designation alone is inadequate to the task of protecting recreation values within these designations, and BLM should commit to ensuring that designated areas truly prioritize the values reflected in designations by more clearly articulating the connection between designation plan components and protection of resource values. BLM could accomplish this by adding an additional sentence to § 1610.1-2(b)(1) stating that designations will be supported by resource use determinations to protect and prioritize the values embodied in the designation.

3. Planning Assessment

Outdoor Alliance strongly supports BLM's initiative to create a more robust up-front data collection process through use of a planning assessment, and beginning the planning process with the best possible informational base is an invaluable investment in the ultimate success of planning.

A. Assessment for EIS-level amendments

BLM notes that it is considering a provision to determine the need for a planning assessment for EIS-level plan amendments on a case-by-case basis. Because of the importance of the assessment phase as a mechanism for gathering essential information, including much of the highest quality information pertaining to outdoor recreation, we believe that an assessment should generally be required for all EIS-level plan amendments.

Additionally, as currently proposed, the rule allows for the deciding official to waive the requirement for an assessment "for minor amendments or if an existing assessment is determined to be adequate."[2] Given the already streamlined provisions for changes to implementation strategies, and the opportunity for EA-level plan amendments, BLM should at minimum commit to an appropriate level of outreach to allow members of the public to provide information regarding the potential need for an assessment before the deciding official may waive the formal assessment process for EIS-level amendments.

[2] Proposed rule § 1610.4

B. Information quality

BLM appropriately places a strong emphasis on using "high quality information" to inform the planning process, and we strongly commend agency efforts to move toward supplementing corporate data with information provided by stakeholders, including the outdoor recreation community. The outdoor recreation community is often, if not always, the best source of information regarding where people go on public lands, the activities they pursue in those places, and the values that support outdoor recreation experiences in those locations. We view the ability to ensure strong outreach to this community and incorporate information provided by outdoor recreationists into the planning process as critical to the success of Planning 2.0.

The term "high quality information" needs to be given greater clarity, however, in order to ensure that the public has sufficient guidance for submitting data to BLM. In particular, we note that numerous valuable sources of information on outdoor recreation like American Whitewater's National Whitewater Inventory[3] and MTB Project[4], a mountain bike trails database, are either directly maintained by or affiliated with advocacy organizations, and this affiliation should not be misconstrued as "bias" within the definition of high quality information. These data sets are maintained primarily as educational resources and as a benefit for organizational members and the public, and are among the most important sources of information on the recreational activities they cover. In addition to clarifying that affiliation with an advocacy organization alone would not constitute "bias" within the meaning of the rule, BLM should provide supplemental guidance and clear standards to help the public in providing high quality information to the agency.

Finally, BLM should provide transparency on the process of determining which sources of information have been found to be high quality by making public all data provided by external stakeholders along with the rationale for inclusion or exclusion of those sources from the planning assessment.

C. Assessment Components

i. Existing designations

Under § 1610.4(c)(5)(vii) of the proposed rule, the planning assessment is required to document "Existing designations located in the planning area, such as wilderness, wilderness study areas, wild and scenic rivers, national scenic areas, or ACECs." While

[3] http://www.americanwhitewater.org/content/River/view/
[4] http://www.mtbproject.com/

documenting the extent of existing designated areas is certainly essential to the RMP development process, BLM should expand this focus to include potential new designations, including those proposed by the public.

This approach is currently taken by the U.S. Forest Service in its planning regulations, which require that the assessment phase include "Existing designated areas located in the plan area including wilderness and wild and scenic rivers and potential need and opportunity for additional designated areas."[5] Considering the potential need for new designations early in the planning process would help to advance the goals of Planning 2.0 by providing an early opportunity in the planning process for stakeholders to provide input on resource values, as well as an opportunity for BLM to solicit input on internally developed proposals.

ii. Eligible Wild and Scenic Rivers

§ 1610.4(c)(5)(v) of the proposed rule appropriately requires the Responsible Official to consider and document candidate Wild and Scenic rivers in the assessment. We request that the Rule clearly define or change the term "candidate wild and scenic rivers," to avoid almost certain confusion and variability in implementing the rule. The rule should either use the standard term "eligible" and/or the explicitly stated definition of "candidate wild and scenic river" should mirror the Department of Interior definition for eligible streams as follows:[6]

> Candidate (eligible) wild and scenic river: A river or stream that meets both of the following criteria: 1) It must be free-flowing, and; 2) possess one or more Outstandingly Remarkable Values.

Missing from the rule is necessary clarification that Resource Management Plans shall contain and/or produce an up-to-date inventory of rivers and streams that are eligible for Wild and Scenic designation, but not pursue formal Congressional designation recommendations (otherwise known as "suitability determinations"). Suitability determinations are required for congressionally mandated study rivers under the Wild and Scenic Rivers Act, but have no applicability to eligible streams in the RMP process. The current BLM practice of releasing eligible streams from protection in RMPs by finding them unsuitable (typically for ephemeral political reasons) undercuts the purpose of the Wild and Scenic Rivers Act, has no basis in law, and constitutes an unnecessary, time-consuming, detailed analysis that has no place in an RMP. We raised this issue in prior comments and are disappointed it was not remedied in the draft Rule.

[5] 36 C.F.R. § 219.6(b)(15)
[6] http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsm9_032047.pdf

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Thank you for considering the perspectives of the outdoor recreation community on BLM's Planning 2.0 initiative. We look forward to continuing to work with the agency on these important improvements to public lands management.

Best regards,

Adam Cramer
Executive Director
Outdoor Alliance

cc: Brady Robinson, Executive Director, Access Fund
Wade Blackwood, Executive Director, American Canoe Association
Mark Singleton, Executive Director, American Whitewater
Mike Van Abel, Executive Director, International Mountain Bicycling Association
Mark Menlove, Executive Director, Winter Wildlands Alliance
Tom Vogl, Chief Executive Officer, The Mountaineers
Phil Powers, Executive Director, American Alpine Club

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Appendix

September 4, 2014

Joe Stout
Division Chief, Decision Support, Planning & NEPA
20 M St., S.E.
Washington, DC 20003

Re: BLM Planning 2.0

Dear Joe:

Outdoor Alliance is a coalition of five national, member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, and Winter Wildlands Alliance and represents the interests of the millions of Americans who paddle, climb, mountain bike, and backcountry ski and snowshoe on our nation's public lands, waters, and snowscapes. Our groups include members in all 50 states who are deeply invested in the management of BLM lands and the superlative recreational resources they contain.

Outdoor Alliance commends BLM's efforts at reinvigorating the land use planning process, and we appreciate the opportunity to offer comments and suggestions at this early stage of Planning 2.0. These efforts to develop a more nimble, efficient, and collaborative process will improve land use plans, help to protect the ecological integrity of BLM lands, and protect and enhance opportunities for outdoor recreation.

BLM manages many of the most iconic places in the American West, and these landscapes make profoundly important ecological contributions. BLM lands provide diverse wildlife habitat, and careful management of these areas is of critical importance in protecting clean water and clean air. Lands managed by BLM have incalculable inherent value, and the planning process is a critical part of ensuring that development activities leave the smallest possible footprint on the land and protect the landscape's inherent and experiential value.

We believe that incorporating sound information on outdoor recreation, the means through which most Americans experience their public lands, as early and as thoroughly as possible into the planning process will help to facilitate the Planning 2.0 goals of planning across multiple scales, keeping plans abreast of changing conditions, and improving the efficiency with which planning is conducted. Fundamentally, planning

across multiple scales will require accounting for social conditions—such as recreational use and its concomitant economic benefits—at a similar level of detail to the ecological condition of the landscape.

Further, incorporating detailed information from the public on recreational use into the planning process at the earliest stages of plan development is certain to improve the quality of plans, make plans more responsive to social conditions and changes to them, and increase efficiency by developing high-quality information at the outset, improving the quality of subsequent decision-making. When plans are based on the best possible information about uses of BLM lands, plans are less likely to require substantial revision through the notice and comment process, and are less likely to generate stakeholder conflict.

Broadly, our comments that follow address three themes:

- First, robust data collection at the outset of planning—and the ability of planers to incorporate that data into the planning process—is crucial to efficient and effective planning;
- Second, we address several important but discrete technical fixes that can be made in the process to better address Lands with Wilderness Characteristics, Wild and Scenic Rivers, and management of bicycles; and
- Third, our comments address the need for effective opportunities for public participation in the planning process.

Outdoor Alliance and our member organizations have substantial experience in the Resource Management Plan development process and have actively participated in the early implementation efforts for the Forest Service's 2012 Planning Rule. We hope the following comments, based on our land use management planning experience across agencies and the goals of Planning 2.0, will be useful to BLM as it works to enhance the land use planning process.

1. Improved Front-End Data Collection is Essential to the Goals of Planning 2.0

Conducting the planning exercise based on the best possible information is essential to all of the goals of the planning process and the aims of Planning 2.0, and BLM should use the occasion of its Planning 2.0 revision process to significantly enhance the role of front-end data collection in RMP development and amendment. As it stands, BLM's planning regulations and handbook contain very little emphasis on gathering information at the outset of planning, and enhancing this stage would vastly improve opportunities for stakeholder engagement, raise the quality of information on which plans are based,

reduce stakeholder conflict and related delay, and result in an improved final product for the management of BLM lands.

From a recreation perspective, capturing information on recreational resources, spatially and experientially—not simply programmatically—is important because of the strong attachment formed by outdoor recreationists to highly specific places and the experiences they support. These experiences provide myriad benefits to the individuals who value them, as well as to local communities, which benefit economically from proximity to these resources. Carefully and specifically documenting these places and experiences, as well as their economic benefits, represents an important component of Planning 2.0's goal of facilitating planning across multiple scales, as the benefits of public lands preserved and protected for their experiential value accrue on a wide range of scales. Additionally, documenting uses as early as possible in the planning process will serve the goal of efficiency by enabling planners to hone in on genuine areas of dispute while resolving minor conflicts before they blossom into major ones.

To achieve a more robust data collection phase, BLM should consider targeted revisions to both its regulations and Land Use Planning Handbook.

Regulations:

BLM should consider modifying 43 CFR §1610.4-3, the "Inventory data and information collection" phase of the planning process to specifically mandate a comprehensive collection of relevant existing information for the planning area, as well as public outreach to elicit early involvement from stakeholders in submitting information relevant to the planning process. For outdoor recreation in particular, recreational users will often, if not always, be the best source of information regarding activities on the BLM landscape, and planners are unlikely to have the best possible information on recreational use without specific outreach efforts to this community.

BLM should also consider two additional changes to its regulations to make certain that sound data collection forms the foundation of planning efforts:

- First, BLM should ensure that 43 CFR §1610.4-1, "Identification of issues," does not precede the development of the sound factual basis which should inform that identification.
- Second, 43 CFR §1610.4-2, "Development of planning criteria," currently emphasizes "That BLM avoids unnecessary data collection and analyses." While it is certainly unassailable that BLM should avoid that which is unnecessary, this early emphasis on avoiding robust data collection is unneeded at best, and

counterproductive to the extent that it discourages the broad data collection that is an important investment in the ultimate efficiency of the planning process. At minimum, BLM should emphasize the need to collect relevant existing information while making clear that planners need not create new data for the planning process.

Land Use Planning Handbook:

BLM should also make revisions to its Land Use Planning Handbook to ensure that data collection occurs at the earliest stages of the planning process, encouraging stakeholder engagement and ensuring that subsequent planning stages and plan components are based on the most complete possible information.

Specifically, BLM should ensure that data collection occurs in a pre-NEPA process that allows information gathered to form the basis for Scoping documents and the Analysis of the Management Situation. By beginning with a robust description of the ecological and social conditions of the planning area, planners will be able to more precisely define issues relevant to the planning process.

Currently, the Planning Handbook emphasizes the documentation of "disputes or controversies" without proper consideration of the factual basis for those disputes. Developing strong data on places of recreational significance and the experiences they support will help to more narrowly define disputes and controversies, leading to a more efficient dispute resolution and planning process. For example, stakeholders looking to engage in resource development activities on BLM lands frequently look to an RMP as the final word on recreation in the planning area, and when plan components are based on incomplete information, this situation is likely to lead to unnecessary conflicts because developers may erroneously assume that areas lacking specific documentation concerning their recreational importance are unimportant.

A specific example of this dynamic is an ongoing dispute in Moab, Utah. When the 2008 Moab RMP was developed, planners did not account for the broad variety and popularity of recreation the Big Flat area, which now hosts a large-scale oil and gas field (despite its designation as a Special Recreation Management Area). Better data collection from recreational users would have brought a better understanding of this landscape to stakeholders and avoided conflicts that are now ongoing. While a landscape-level Moab Master Leasing Plan holds much promise to remedy some of these conflicts, better data on the front end of the RMP process could have avoided the conflicts stakeholders are now addressing.

On a more fundamental level, it is impossible to develop sound Desired Outcomes and Allowable Uses for the planning area without a strong understanding of the places recreational users visit on BLM lands and the activities they pursue in those places.

2. Effective Data Collection and Use Is Dependent on BLM's Ability to Efficiently Incorporate Outside Data Sources

As noted above, recreational users will often, if not always, be the best source of information on recreational use of BLM lands, and BLM must find ways to effectively move beyond its corporate data, where necessary, to include outside data sources in the planning process. Numerous online resources offer detailed information on recreational use, including qualitative and geospatial information. Among those resources are American Whitewater's National Whitewater Inventory;[1] Mountain Project's inventory of climbing areas;[2] and MTB Project's inventory of mountain biking trails.[3]

These sources provide exceedingly high quality, user-generated descriptions of many of the outdoor recreation resources found on BLM lands. Trail descriptions on MTB Project, for example, contain user-generated mapping data, information on ascents and descents, and qualitative descriptions of trails. American Whitewater's database provides Google Map data for put-ins and take-outs and valuable information about the water levels preferred by whitewater paddlers, in addition to qualitative descriptions and photos of river segments. Mountain Project provides descriptions for climbing routes across the country, including qualitative descriptions, information on seasonal closures, and breakdowns of routes by difficulty, type, and qualitative rating. These types of sources provide both important concrete data regarding recreational resources on BLM lands and qualitative insights into the values of the user community.

To better incorporate these types of data resources—in addition to analog sources like guidebooks and information provided directly by the public—BLM should consider what changes may be necessary to provide planners with the tools they need to incorporate these sources, both in terms of technical resources and in terms of designing the land use planning workflow to ensure that planners are able to properly take these sources of knowledge into account at the early stages of the planning process. This may require, for example, targeted changes to Appendix G of the Land Use Planning Handbook.

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[1] American Whitewater, National Whitewater Inventory, http://www.americanwhitewater.org/content/River/view/.
[2] Mountain Project, http://www.mountainproject.com/.
[3] MTB Project, http://www.mtbproject.com/.

Outdoor Alliance is also actively working to enhance our ability to provide useful data for agency planning efforts, and we very much welcome feedback regarding steps we can take to make our data easier to incorporate into the planning process.

3. Broader Consideration of Information on Recreation Will Facilitate BLM's Goal of Planning Across Landscapes at Multiple Scales

Effectively planning across landscapes at multiple scales will require BLM to give greater attention to the social conditions of the broader landscape, and recreation plays an important part in this consideration.

One example of this is the role that frontcountry areas play in offering close-to-town recreation opportunities that benefit local residents, visitors, and gateway communities through the effects of the outdoor recreation economy. Through its Planning 2.0 development process, BLM should actively pursue avenues to evaluate, protect, and enhance opportunities for frontcountry recreation. Frontcountry areas often may lack the Wilderness or other characteristics that would lead to an area's elevation out of multiple-use management, but these areas are often among the most important in providing close-to-home opportunities for active outdoor recreation. Better understanding these areas through enhanced mapping and GIS capabilities should be a goal of Planning 2.0, and BLM should use this process as a chance to build upon its abilities to protect and enhance the important recreational resources and experiences provided by the frontcountry.

Just as frontcountry areas are important for close-to-home recreation opportunities, undeveloped tracts of BLM lands, often referred to as backcountry, provide high-quality dispersed recreation opportunities away from town, and recreationists often travel to backcountry areas for multi-day excursions. The conservation of important backcountry areas is a necessary component of multiple-use management, but BLM currently lacks sufficient RMP-based planning tools to adequately manage backcountry areas. This leaves important places at risk for inappropriate developments that could industrialize backcountry areas and reduce their appeal for outdoor recreation.

We recommend that BLM create an administrative backcountry conservation area designation to manage and conserve identifiable areas of public lands that are generally intact, generally undeveloped, and contain important wildlife habitat and recreation experiences. Additionally, BLM should consider the role that Special Recreation Management Areas and Extensive Recreation Management Areas play in protecting areas of recreational significance and consider enhancements to these designations to ensure that incompatible uses are truly prevented from degrading these areas.

Specifically, BLM should strongly consider priority standards for SRMAs and ERMAs so that recreation is protected and enhanced, and these important locations are not affected negatively by resource extraction (as occurred in the Moab example above). To truly manage for the high value recreational resources found on many BLM lands, the agency should develop non-exclusive policies that prioritize the protection of recreational resources that are widely acknowledged as high quality, popular, and unique. Currently, SRMAs and ERMAs focus more on potential funding for infrastructure than on the recreational experiences that these locations provide. BLM should use Planning 2.0 as an opportunity to put some "teeth" into these designations and bring meaning to the SRMA and ERMA designations.

An additional critical component of planning for recreation across landscape scales is ensuring that BLM has the best possible information about the $646 billion outdoor recreation economy,[4] one means of evaluating the effects of public lands management decisions on proximate communities. Often, consideration of the economics of outdoor recreation is narrowly focused on the effects of visitor spending in the study area. A large body of research exists, however, documenting the role of outdoor recreation opportunities in attracting businesses and workers[5] and the relationship between protected public lands and economic growth.[6]

In addition to economic impact analyses (EIAs), a common method for evaluating the effect of tourist spending on a local economy, economists have a broad range of tools that can help to illuminate the economic work being performed by outdoor recreation and the protected public lands where it often occurs. As described above, an array of studies persuasively document the connection between protected public lands and economic growth, as well as the ability of protected lands to attract high-skill workers and industries. Other valuation techniques include hedonic property value analysis, a method of breaking down the components of housing price data to ascertain the role of an attribute, such as proximity to BLM lands or other recreational amenities, in the overall price of housing, thereby revealing willingness to pay for proximity to the resource; the travel-cost method, a means of constructing a demand curve for willingness to pay for a visitor day at a recreational amenity; and contingent valuation, a technique for eliciting an individual's willingness to pay for a resource or experience.

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[4] OUTDOOR INDUSTRY ASSOCIATION, THE OUTDOOR RECREATION ECONOMY (2012), *available at http://outdoorindustry.org/pdf/OIA_OutdoorRecEconomyReport2012.pdf.*

[5] *See, e.g.*, SONORAN INSTITUTE, THE CAPITALIZATION OF OUR CLIMATE: ATTRACTING HIGHLY SKILLED WORKERS TO ARIZONA'S SUN CORRIDOR (2013), *available at* http://www.sonoraninstitute.org/component/docman/doc_download/1544-the-capitalization-of-our-climate-attracting-highly-skilled-workers-to-arizonas-sun-corridor-09172013.html.

[6] *See, e.g.*, HEADWATERS ECONOMICS, THE VALUE OF PROTECTED LANDS, http://headwaterseconomics.org/land/reports/protected-lands-value.

These techniques help to flesh out a fuller picture of the economic work being performed by the outdoor recreation opportunities offered on BLM lands, and these types of studies should be included alongside visitor-spending based measurements such as EIAs whenever possible. Ensuring that these metrics are considered by planners may require targeted revisions to the Land Use Planning Handbook.

4. BLM Should Clarify Management and Planning Policy Regarding Lands With Wilderness Characteristics

An ongoing challenge for BLM planners and recreational users alike is what requirements are involved with the management of Lands with Wilderness Characteristics (LWC). Many BLM planners in the field remain confused (despite BLM instruction memos[7]) as to their mandate when managing LWC-assessed lands. Many managers believe that they are required to manage LWC lands according to the same requirements as Wilderness, when the policy instead requires that wilderness character be "considered" as "part of its multiple-use mandate in developing and revising land use plans and when making subsequent project level decisions."

This distinction is significant for planners and managers, especially when planners assess locations of existing high recreational use as having LWC qualities. Often LWC assessments do not account for existing uses that are nonconforming relative to the requirements for Wilderness, but which nevertheless are light on the landscape and compatible with a high degree of protection for these resources. Because of this, complications may arise for some forms of recreation and other multiple-uses that may be nonconforming relative to the requirements for management of Wilderness, but which nevertheless are compatible with a high degree of protection for the landscape. In part, this may be addressed by our suggestions above that BLM collect better information on recreational use before implementing planning, in particular while making LWC assessments. However, a more fundamental understanding of LWC management is needed at the BLM field level.

5. BLM Should Omit or Defer Suitability Determinations for Eligible Wild and Scenic Rivers

The Wild and Scenic Rivers Act (WSRA) is intended to protect designated Wild and Scenic Rivers and a suite of potential Wild and Scenic Rivers. The WSRA requires BLM

[7] *See* "Requirement to Conduct and Maintain Inventory Information for Wilderness Characteristics and to Consider Lands with Wilderness Characteristics in Land Use Plans," http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2011/IM_2011-154.html.

to consider potential Wild and Scenic Rivers during planning processes.[8] Potential Wild and Scenic Rivers are either 1) identified as eligible by the BLM,[9] or 2) identified as potential Wild and Scenic Rivers by Congress.[10] These are commonly referred to as *eligible rivers* and *study rivers* respectively.

Eligibility is a straightforward administrative determination that is ubiquitous and mandatory during planning. To be eligible, a river must be free-flowing and possess at least one outstandingly remarkable value.[11]

Suitability is a much more in-depth, costly, and time-consuming analysis that results in a formal detailed report to the President that either recommends specific rivers for designation or finds them unsuitable for designation. Unsuitable rivers are released from the protective umbrella of the WSRA. Importantly, BLM is authorized and mandated to determine the suitability or unsuitability only of *study rivers* determined *by Congress* to be potential Wild and Scenic Rivers.[12] BLM is not mandated or authorized to determine the suitability or unsuitability of rivers found to be *eligible* by the BLM under Section 2(b) of the WSRA.

We request that BLM require that planning processes update the eligible rivers inventory as required by the WSRA, and simply omit the practice of conducting suitability determinations on eligible rivers, at least in the context of planning. Practically this will significantly streamline the process of addressing WSRs in planning, saving time and money currently wasted. It will also result in no less protection for Wild and Scenic rivers or for a roster of important potential Wild and Scenic Rivers in accordance with the vision of the WSRA.

As an example of this approach, the 2012 Forest Service planning rule correctly requires eligibility inventories and is silent on suitability.[13] We request that BLM take a similar approach.

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[8] Wild and Scenic Rivers Act of 1968 § 5(d)(1), 16 U.S.C. § 1276(d)(1) (2014) ("In all planning for the use and development of water and related land resources, consideration shall be given by all Federal agencies involved to potential national wild, scenic and recreational river areas.").
[9] *See* 16 U.S.C. § 1273(b).
[10] *See* 16 U.S.C. § 1276(b).
[11] 16 U.S.C. § 1273(b).
[12] 16 U.S.C. § 1275(a) ("The Secretary of the Interior … shall study and submit to the President reports on the suitability or nonsuitability for addition to the national wild and scenic rivers system of rivers which are designated herein or hereafter *by the Congress* as potential additions to such system." (*emphasis* added)).
[13] *See* National Forest System Land Management Planning Rule, 36 C.F.R. § 219.7(c)(2)(vi) (2014) ("Identify the eligibility of rivers for inclusion in the National Wild and Scenic Rivers System, unless a

6. BLM Should Define "Bicycles" to Facilitate More Precise Management

The phrase "motorized and mechanized" has become commonly used in BLM planning documents. Alliterative qualities aside, the lack of precision embodied in this phrase makes for poor land management policy. BLM regulations for "mechanized" uses apply to everything from bulldozers to bicycles, and this is simply too dull of a tool to facilitate careful and thoughtful management decision-making. As a result of this term's over breadth, bicycles are frequently indirectly managed as an appendage of the motorized vehicle category rather than based on their own merits, and indirect management is very often mismanagement.

To facilitate the direct management of bicycle use, we request that the following definition of a bicycle, borrowed from the National Park Service, be incorporated into the planning materials and regulations, if necessary:

> *Bicycle*. A device propelled solely by human power upon which a person or persons may ride on land, having one, two, or more wheels, except a manual wheelchair.

By incorporating this definition, the BLM will have the basic means for directly managing bicycle use on terra and snow trails in the framework for travel management and land use planning.

7. Public Participation in the Planning Process Will Help Meet the Goals of Planning 2.0

Throughout Planning 2.0, BLM should look for ways to enhance public participation in the RMP development process, particularly with regard to developing a more robust data collection phase at the outset of planning. We commend BLM's efforts at developing a centralized ePlanning platform, and we hope that, moving forward, this program will foster data sharing between the agency and the public, including detailed spatial information. Additionally, we are hopeful that these efforts will allow geographically dispersed stakeholders to participate in the planning process on an equal footing with more local parties. Outdoor recreationists often travel great distances for superlative recreation opportunities and may be deeply invested in landscapes far from their homes. Allowing these stakeholders the opportunity to participate in RMP

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systematic inventory has been previously completed and documented and there are no changed circumstances that warrant additional review.").

development from a distance will ensure that all interested parties are represented in the process.

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Thank you for consideration of our perspective and suggestions as BLM works through the initial stages of Planning 2.0. We look forward to working with BLM in moving forward on this valuable effort.

Best regards,

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