

OUTDOOR ALLIANCE

September 29, 2023

Director Tracy Stone-Manning
Bureau of Land Management
1849 C St. NW
Washington, DC 20240

Via email to: blm_hq_recreation_feedback@blm.gov

Re: BLM's Blueprint for 21st Century Outdoor Recreation

Dear Director Stone-Manning:

On behalf of the human-powered outdoor recreation community, thank you for the work of the Bureau of Land Management and the Foundation for America's Public Lands in the development of *The Bureau of Land Management's Blueprint for 21st Century Outdoor Recreation*. We look forward to working with BLM to implement the Blueprint and support high-quality recreation opportunities across the public lands and waters managed by the agency.

Outdoor Alliance is a coalition of ten 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, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

As the Blueprint recognizes, BLM manages some of the most outstanding recreation opportunities in the country and the world, and we particularly appreciate the Blueprint's recognition of BLM's distinctive niche, defined "by the natural, geological, and culture resources the agency manages and the relative freedom people enjoy shaping their own experiences."

We support the four strategic pillars identified by the plan and look forward to assisting in their implementation.



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Grow and Diversify Resources for BLM Recreation

Our community appreciates the recognition of the challenges created by Congress's consistent underfunding of BLM recreation. Moving forward, we hope the agency will help empower advocates to tell the story of the agency's needs. In part, this comes from clear communication around the selection of projects for funding, for example, through the deferred maintenance funding stream from the Great American Outdoors Act; clarity on which projects were considered but deferred will help the public and Congress better understand the need for increased support for the agency.

We particularly appreciate the Blueprint's identified core strategy around leveraging resources provided through the Inflation Reduction Act and Infrastructure Investment and Jobs Act. We see significant opportunity to pursue projects that include recreation in restoration and resilience efforts, and we would very much like to explore how the outdoor recreation community can assist in these efforts.

We note, also, the emphasis on exploring the potential for user fees to supplement appropriations as a source for BLM recreation funding. We appreciate the acknowledgment that this approach raises equitable access concerns, which we would like to underscore. We hope the agency will move judiciously—and with significant public input—on this strategy.

Prioritize and Embrace Partnerships

The outdoor recreation community appreciates the Blueprint's emphasis on partnerships. Among other things, the outdoor recreation community is often the best source of information on recreational use of public lands and waters: where people go, when they go there, to pursue what activities, and in pursuit of what values. Outdoor Alliance maintains the most comprehensive GIS data set of recreational sites, and we are keen to continue exploring how to make this data more accessible and useable for BLM.



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As another partnership example, BLM's Colorado office has been highlighting the impressive quantity of river access managed by BLM in the state.¹ Outdoor Alliance member organization American Whitewater has been partnering with BLM state and field offices to better understand use patterns, impacts, and gaps in access needs. This partnership grew organically, but it is the type of partnership envisioned by the Blueprint that can be systemized. Coordination like this with on-the-ground recreation users creates understanding that will help diversify resources and meet increased demand while protecting resources. Through this partnership with American Whitewater, the BLM is identifying access improvements needed on the Rio Grande River and closely monitoring use on heavily used sections of the Colorado River.

Partnerships are also particularly important for effective management of resources, like rivers and trails, that cross jurisdictional boundaries.

Expand Outreach and Establish a Culture of Inclusion

The outdoor recreation community appreciates the emphasis on outreach and building a culture of inclusion. At times, our experience has been that land managers regard recreation as something that happens to them—a challenge to manage—rather than an activity to promote. This sentiment is understandable given the agency's capacity constraints, but it is also a dynamic that needs to be purposefully overcome. This is particularly important with regard to fostering an inclusive and welcoming environment for diverse visitors to public lands and waters, and we look forward to working with BLM to support an inclusive culture around recreation access and agency decision-making.

Meet the Demand, Protect Resources, and Improve Access

Outdoor Alliance appreciates the emphasis on improving access and conservation of resources, and we hope the BLM will recognize and move forward purposefully on opportunities to pursue these goals in mutually reinforcing ways. Recreation is the most common way in which Americans experience their public lands and

¹ See, e.g., Doug Vilsack, Lots of Paddling Opportunities on BLM Land, The Daily Sentinel, https://www.gjsentinel.com/news/western_colorado/lots-of-paddling-opportunities-on-blm-land/article_9f92f3ec-2654-11ee-92b6-4be1b4b87d72.html.



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waters, and recreation will be the way in which Americans most directly and personally feel the benefits of important conservation efforts undertaken by the agency.

We particularly appreciate the emphasis on recreation planning and visitor use monitoring and data. These steps will be essential as BLM advances on efforts like the Public Lands Rule² and updates to its oil and gas leasing regulations.³ For example, by engaging in a comprehensive assessment of recreation resources and uses, BLM will be better able to target conservation efforts contemplated by the Public Lands Rule and ensure mitigation for impacts of development activities on recreational resources. Similarly, the proposed oil and gas leasing regulations laudably apply screening criteria to assign a low preference for proposed leases that impact recreational resources, and this filtering will be more effectively applied with a sound understanding of recreational resources and values on BLM land. As noted above, Outdoor Alliance maintains a high-quality data set of recreational resources. Strong public engagement on planning efforts will also be essential.

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The outdoor recreation community greatly appreciates BLM's efforts in the development and advancement of its recreation Blueprint, and we look forward to working with BLM towards its successful implementation.

Best regards,



² Conservation and Landscape Health, 88 Fed. Reg. 19583 (proposed Apr. 3, 2023) (to be codified at 43 C.F.R. pts. 1600, 6100). *See also*, comments of Outdoor Alliance, The Conservation Alliance, and Outdoor Industry Association, *available at* <https://static1.squarespace.com/static/54aabb14e4b01142027654ee/t/64a89f8ccd12e74f5954bf86/1688772493394/OA+TCA+OIA+BLM+rule+comment+final+draft.pdf>.

³ Fluid Mineral Leases and Leasing Process, 88 Fed. Reg. 47562 (proposed July 24, 2023) (to be codified at 43 C.F.R. pts. 3000 *et seq.*). *See also*, comments of Outdoor Alliance, Public Lands Solutions, The Conservation Alliance, and Outdoor Industry Association, *available at* <https://static1.squarespace.com/static/54aabb14e4b01142027654ee/t/65146092da7bec0e3cba9e53/1695834258468/OA+PLS+TCA+OIA+fluid+mineral+leasing+comments+%281%29.pdf>.



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