Executive Summary of BLM's Grand Junction Field Office Proposed Resource Management Plan.

The Grand Junction Field Office ("GJFO") of the BLM located in Grand Junction, CO has released the proposed Resource Management Plan ("RMP") for the office and is looking for public comment by June 25, 2012. The RMP proposes to:

1. Reduce cross-country travel from 445,400 acres to 0 acres;
2. Close between 60-70% of existing routes in areas where motorized use is permitted;
3. Presents administrative routes as open for public access when they will not be; and
4. Increase areas where motorized use is prohibited from 35,300 acres to 187,500 acres in the preferred alternative and possibly 379,500 acres.

The RMP provides a path of management for the field office that is completely inconsistent with projected growth in demand and usage and fails to protect the significant economic benefits that result to local communities from the high levels of multiple use currently available in the planning area. The RMP further provides little to no analysis of economic issues, or the impact of particular alternatives on the economic benefits flowing to local communities from the GJFO. The economic conclusions that are presented and relied on for balancing of multiple uses are simply fatally flawed. The RMP fails to address that routes being closed are multiple use routes providing all users access to the recreational opportunities on the GJFO for a wide range of uses. It is very common that these uses may not be directly associated with motorized recreation.

The RMP appears to rely on the quantity of pages, rather than the quality of information to justify decisions. This results in a plan that is poorly organized, overly long and directly impairs the publics ability to meaningfully comment, as evidenced by the lack of information regarding closures of particular routes or areas. This lack of information directly impairs the publics ability to meaningfully comment on the reason for closure or assist in mitigating the management concern and compels the submission of comments that are limited to the liking of a trail or area. It has been the Organizations experience these comments are rarely successful.

The RMP is not a cohesive, coordinated plan but is more accurately summarized as numerous decisions on particular issues that are published at the same time. There is very little analysis of long term impacts of the proposed closures or how the various management standards relate to each other in terms of impacts. This analysis is simply insufficient to satisfy NEPA requirements requiring a detailed statement of high quality information on why a decision is made or an alternative is chosen.

Given these critical flaws plaguing all alternatives of the RMP, the Organizations are forced to support Alternative A. Although there are small portions of other alternatives could be supported, the existing flaws must be corrected and further public comment must be provided regarding a field office level alternative.

The Organizations concerns are:

The GJFO economic analysis is fatally flawed.

1**. The economic impact of the proposal has not been properly accounted for, which results in a range of alternatives being presented that improperly supports closures of routes as recreational activity has been horribly undervalued**. The RMP balances multiple uses based on economic impact calculations that are a fraction of the true amount spent. Proper inclusion of recreational spending in federal planning actions is a problem that was recently highlighted in the Western Governors' Association Report on recreational economics. Rather than addressing the known issue of accurately addressing recreational spending in federal planning, the GJFO becomes yet another example of the problem identified by Western Governors Assoc.

2. **Economics are identified as a priority management issue but are simply never addressed. While numerous volumes have been generated regarding a wide variety of issues, no draft economic contribution analysis has been prepared** despite numerous BLM mandates that economic impacts of any proposal be documented in numerous steps prior to release of a draft plan. The Organizations believe preparation of a consolidated economic impact document

would have caused numerous flaws in the economic analysis process to be addressed and resolved prior to interdisciplinary team meetings.

3. **Accurately addressing recreational spending is a critical component in the balancing of multiple uses as economic impacts are the primary measure for the balancing of recreation with other uses in planning meetings.**

4a. The GJFO conclusions on recreational spending are inconsistent in all three commonly used measures for recreational spending which are:

- Total recreational spending;
- Average daily spending; and
- Number of persons employed in recreational related jobs in the planning area.

4b. The RMP calculations of **total recreational spending** in the planning area are entirely inconsistent with research from federal partners, state agencies and user groups regarding total recreational spending. The RMP calculates recreational spending to be $**7.2 million** for the GJFO planning area. By comparison:

a. **Colorado Parks and Wildlife** has concluded that just hunting and fishing in the Mesa and Garfield County areas, which encompass the GJFO planning area, results in over **$131 million** in annual spending to these counties;
b. **Colorado Department of Tourism** recently concluded that travel to Garfield and Mesa Counties resulted in over **$384 million** in spending in 2011;
c. The **Colorado Off-Highway Vehicle Coalition** has concluded that over **$141 million** is spent in the GJFO planning from the use of registered off highway vehicles, not including four wheel drive vehicles registered for road usage; and
d. The Paiute Trail system in Utah has concluded that $38 million in annual revenue flows to the 4 counties the 600 miles of its trails network cross.

5a. The RMP calculations of **average daily recreational spending** in the planning area is entirely inconsistent with research from federal partners, state agencies and user groups regarding average daily recreational spending. **Average recreational spending for user groups will vary across user groups but it generally consistent across geographic boundaries**. The GJFO conclusions are entirely inconsistent with any user group spending. GJFO average spending is calculated as follows:

$7.2 million total recreational spending/708,092 recreational visitor days= $10.16 per day per user average recreational spending

- **The USFS NVUM research and analysis concludes that the average daily recreational spending total in Region 2 is $61.92 per day**. Application of the NVUM multiplier for particular uses results in conclusions that are roughly consistent with per day spending identified by particular user groups, such as the motorized community.

- Colorado Parks and Wildlife research indicates average spending for those involved in hunting and fishing activities is as follows:

Exhibit III-3.
Average Expenditures per Hunter and Angler per Day, 2007

Activity	Resident $ per day	Non-resident $ per day
Big game hunting	$106	$216
Small game hunting	$94	$87
Fishing	$67	$118

5b. **Basic consistency of BLM recreational spending and Forest Service NVUM data is mandated by two Presidential Executive Orders and the BLM National Office mandate**. There simply is no consistency in the conclusions regarding recreational spending when comparing the GJFO conclusions and the NVUM data from Region 2 or any forest in Region 2.

6. **The $10.16 average daily spending calculation relied on in the planning process is entirely inconsistent with the GJFO own research on this issue.** In the limited GJFO analysis of economics (one question on a questionnaire) the raw data collected indicated that $741 per trip was spent for recreational activity. This translates to $43.32 per day per user. No explanation is provided for the difference between raw data and the conclusions that are used in planning and balancing of multiple uses.

7. The GJFO RMP asserts **90 jobs as a result of recreation on the GJFO planning area**, which is entirely inconsistent with research from federal, state and local government research in addition to user group research. This research concluded:

- COHVCO found that **2,147 persons** are employed in positions related to motorized recreation in the Grand Junction planning area;
- CPW found that **1,392 persons** are employed in Garfield and Mesa County areas in positions that are directly related to hunting and fishing activities;
- Colorado Tourism found that **4,310** persons are employed in positions related to tourism and travel in Garfield and Mesa counties;
- **Grand Junction Chamber of Commerce identifies Cabela's in Grand Junction as an employer of over 200 people**;
- The Paiute Trail in Utah concludes that **146 jobs** directly result from their 600 miles of trails;
- Numerous motorcycle and OHV shops in the Grand Junction area individually employ 50 people all year long; and
- The GJFO employs 50 people for operation of the Field Office.

8. The Organizations are concerned that the inaccuracy of planning evidences a larger failure understand the communities that are adjacent to the GJFO. The Grand Junction area has a comparatively small population compared to the front range communities. Metro Denver is 6x the population of Grand Junction but when a comparison of the retail recreational locations available these communities are very similar and Grand Junction has a long history of several retailers that have yet to come to the Denver area. Grand Junction has retail outlets for every major motorized recreational manufacturers, a Cabela's (which is only now coming to Denver), an REI, Sportsman's Warehouse, numerous camping, RVing and fishing vendors. This level of retail interest is unprecedented for a community of this size and indicates the high levels of revenue that flows into the local economy from recreational use of the accessible public lands in the area. This level of commercial base simply cannot be supported with recreational spending in the $10 per day found in the GJFO planning process.

9. **Numerous other State planning documents, such as the Statewide Comprehensive Outdoor Recreation Plan which must be addressed by federal law in any BLM planning, are never analyzed in the GJFO RMP**. These documents specifically address the significance of outdoor recreation to the Colorado economy and weigh heavily against the range of alternatives presented.

10. The high value of the multiple use trail network to local communities is clearly evidenced in numerous statements from local government and regional economic development agencies regarding the multiple use trails being a major reason to move to the Grand Junction area. All statements from these local and regional partners conflict with the basic direction of the RMP.

11. Numerous research documents outline the critical role that a multiple use trail network can provide for rural communities.

12. **A wide range of socially based information, such as ethnicity, housing prices, commuting ratios and unemployment is provided for Mesa County and the State of Colorado but at no point are these factors addressed for Garfield County, despite Garfield County encompassing 25% of the GJFO planning area**.

13. **Despite extensive social information being provided, such as unemployment rates and tax revenues, no discussion is provided on how the proposed management changes will impact these social factors**. The Organizations believe implementation of any of the range of alternatives provided in the RMP would have a disastrous affect on all these issues, but these impacts are never discussed in the proposal.

14. **Valuation of partnerships and user group funding for multiple use trails is simply never addressed in the RMP**. Over the last 10 years, millions of dollars from the Colorado Parks and Wildlife OHV Grant program have been used for maintenance of trails in the Grand Valley and local clubs have volunteered thousands of hours of labor and extensive additional funds as matches for the funding from the CPW grant program. At no point are these efforts even addressed in the RMP.

15. The GJFO economic contribution analysis is calculated based on the exclusion of all local spending. This model directly conflicts with the model recently used by the Colorado River Valley Field Office and Kremmling Field Office who prepared the economic analysis to include local spending only. This conflict evidences a clear lack of scientific basis for all plans involved.

Areas of Critical Environmental Concern.

1. There are three criteria for designation of an area of critical environmental concern outlined as follows:

- There needs to be an important concern;
- Relevant management standards for the concern and boundaries for the areas of concern; and

- A detailed statement relating the management standards to the issue.

While the RMP provides numerous concerns in areas to be designated as ACEC areas and numerous management standards in these areas, there is simply no discussion of how the management concern is related to the management standards resulting in numerous management standards that do not appear to be related to the management issues in the ACEC area.

2. The need to develop a detailed statement outlining how the special management standards of the ACEC designation will resolve or mitigate the important issue that has been identified was specifically identified in the 2010 GJFO draft report on this issue. Rather than perform the needed analysis, this reference is simply removed from the appendix to the RMP and no additional analysis is provided to address how proposed management will relate to the important issue. Often these relationships are tenuous at best.

3. ACEC designation appears to be a surrogate for endangered species management issues. Proper management of endangered species requires a thorough analysis and review of management standards as these standards often change. It has been the Organizations experience that often RMP standards do not reflect up to date positions on ESA issues, and public comment on these issues will not resolve these issues if ACEC are designated without discussing the ESA management standards that are the basis of the ACEC boundary.

Wilderness Study Areas.

1. Numerous changes in management standards in WSA are proposed, but no basis for these changes are discussed. No WSA in the GJFO are created by Congressional declaration and many management standards are a significant departure from current management standards.

2. Changes in management standards appear to be based on BLM manuals that were created without pubic comment or NEPA review. Failing to allow for meaningful comment and review in the RMP process only compounds problems already existing in the process for changes to management standards.

3. FLPMA, which provides BLM authority to inventory possible Wilderness Characteristic areas, never lowers NEPA requirements for analysis of these areas and mandates multiple use remains the standards for management of these areas unless such use impairs possible future designation. At no point does the RMP discuss how any existing usage to become prohibited under the RMP impairs designation of any area as Wilderness by Congress.

4. Expansion of areas where limited management is required does not aid forest health as a wide range of research has recently concluded that active management of public lands is necessary to maintain forest health and water quality and that designated Wilderness areas in the State of Colorado are some of the most unhealthy areas of public lands. This research also concludes the lack of management in these areas directly impairs the health of other areas adjacent to the unmanaged areas.

5. Extensive research has been performed by the USFS in conjunction with all Front Range water districts, which has concluded that active management is a critical tool in maintaining watershed health. This research is never addressed and weighs heavily against the designation of any new WSA or WCA in the GJFO.

Law Enforcement.

1. Law Enforcement is addressed as a primary long term concern in the GJFO. The basis of this position is never clearly stated and conflicts research performed by the CPW Trails program. The CPW research indicates that only 1.5% of OHV users are committing a crime, other than failing to properly register their OHV, serious enough to warrant issuance of a summons after contacting professional law enforcement officers. These conclusions are based on over 25,000 contacts of OHV users by professional law enforcement officers throughout the state and including the GJFO.

2. This research also indicates that poorly or incompletely implemented plans, such as poorly created maps, bad signage or signage that conflicts with maps are the most common basis of concerns regarding law enforcement.

3. The GJFO must center on proper implementation of a logical and factually based plan in order to provide good educational resources for all users and avoid the need for long term law enforcement as stated in the RMP. This need is never addressed in the GJFO, which provides an implementation timeline for changes that is simply unrealistic and will directly result in law enforcement issues that the GJFO asserts is a priority to avoid.

User Conflict.

1. Reduction of user conflicts is identified as a priority management issue for the RMP, but no analysis is provided on how management changes will address this issue. Relevant social science has concluded that user conflicts are caused by two issues:

a. Personal conflicts between users- very small portion of all conflict is represented by two users trying to use the same areas in a manner that directly conflicts with the other user. Closures may help address these conflicts.

b. Social conflicts between users- no personal contact occurs and conflict is the result of users simply believing the other user has no right to use the area in the manner chosen, regardless of the legality of either usage. Research indicates these conflicts are very common and cannot be resolved with closures of areas and rather that closures of areas can result in increased conflict between users as the closures result in an imbalance of opportunities between demand of users and the supplied opportunity.

2. GJFO planning relies only on closures to address user conflicts. This will result in increased long term conflict between users as all motorized recreation in the Grand Junction area occurs on the GJFO lands. Motorized users do not have the wide range of opportunities for their recreation that are provided by local communities, such as parks and bike paths, for the non-motorized community.

Comments should be submitted on or before June 25, 2013 to:

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