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March 16, 2011

The Honorable Bob Abbey
Director
Bureau of Land Management
U.S. Department of the Interior
1849 C Street NW, Rm. 5665
Washington, DC 20240

Dear Director Abbey:

As associations who represent the interests of millions of responsible motorized recreation enthusiasts, we oppose the new Bureau of Land Management's (BLM) Wild Lands policy. We have questions concerning the definition of Wild Lands, designations, and implementation plans, as they relate to motorized recreation within Secretarial Order 3310. Moreover, we seek to clarify indications that you believe there is no grass-roots opposition to this order. We, the undersigned, believe this new designation may severely restrict the ability of our members to responsibly recreate on public lands managed by the BLM.

According to a Department of the Interior (DOI) press release, dated December 23, 2010, "*Secretarial Order 3310 directs the Bureau of Land Management (BLM), based on the input of the public and local communities through its existing land management planning process, to designate appropriate areas with wilderness characteristics under its jurisdiction as "Wild Lands" and to manage them to protect their wilderness values.*"

While the DOI release states that the new designation is intended to protect the wilderness values of certain lands, many of our members remain concerned that this new label may lead to confusion among users on the differences between Wilderness, Wilderness Study Areas (WSAs) and Wild Lands.

We seek answers to the following questions as they relate to responsible motorized recreation:

- What is the BLM's definition of the Wild Lands term, and how does it differ from Wilderness and WSAs?

- Will a Wild Lands designation be managed with the same restrictions granted Wilderness until such a designation can officially be made by Congress?
- Will the new designation require approval by Congress, congressional delegations or governors of affected states?
- Will the agency work with local authorities and user groups to preserve established uses, including responsible motorized recreation routes, prior to any designations? And if so, to what extent?
- How long will designated lands be managed as Wild Lands before they are either granted full Wilderness status or de-listed and released to the public?
- Will the newly created Wild Lands designation conform to the tenants of the 1964 Wilderness Act?
- What is the BLM's detailed plan to determine the eligibility of lands to be designated Wild Lands? In addition to the plan, what is the process?
- Does the BLM have specific areas under review where it will apply this new policy and, if so, where are they?
- When does the BLM plan to begin implementation of the Wild Lands policy?
- What statutory authority does the agency cite that allows the Wild Lands designation to be a priority above other multiple-uses of BLM lands?

Furthermore, we seek to clarify indications that you believe there is no grass-roots opposition to the Wild Lands designation. A *Denver Post* article (enclosed) entitled "Western Republicans decry Obama wilderness policy," states:

In an interview, Abbey said planning has already begun, and designation of the first wild lands could occur as soon as this summer in Idaho, Wyoming and Alaska. He denied that the plan is unpopular in the West, citing letters of support from recreation and conservation groups and the outdoor industry.

The same article indicated you believe people are hearing "rhetoric" from Western lawmakers, but no grass-roots opposition.

As associations who represent responsible motorized enthusiasts, we strongly disagree with any assertion that there is no grass-roots opposition. To the contrary, there is considerable and growing opposition to Wild Lands from those who have responsibly recreated on public lands for decades.

We encourage the BLM to continue to engage the public in their deliberations on the disposition of public lands. Our members stand ready to serve as a resource for you as you further consider responsible public access to America's public lands.

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Thank you for your consideration of our request. We look forward to receiving your timely response to the questions and comments above.


Sincerely,



Edward Moreland
Senior Vice President, Government Relations
American Motorcyclist Association



Royce Wood
Government Affairs Manager
All-Terrain Vehicle Association



Don Riggle
President
Trails Preservation Alliance



Michael Swenson
Executive Director
Utah Shared Access Alliance



Jerry Abboud
Executive Director Legislative Affairs
Colorado Off Highway Vehicle Coalition



Dave Pickett
President
AMA-District 36



Jerry Grabow
President
AMA District 37 Off-Road Division



Jim Woods
President
California Off-Road Vehicle Association

Enclosure

CC: Chairman Doc Hastings, U.S. House Committee on Natural Resources
Ranking Member Edward Markey, U.S. House Committee on Natural Resources
Chairman Rob Bishop, Subcommittee on National Parks, Forests and Public Lands
Ranking Member Raúl Grijalva, Subcommittee on National Parks, Forests and Public Lands