



Feb. 1, 2013

AmericanMotorcyclist.com

Ms. Helen Hankins
BLM Colorado State Director
BLM--GJFO RMP
2815 H Road
Grand Junction, CO 81506

Dear Director Hankins:

The American Motorcyclist Association is writing to you regarding the federal Bureau of Land Management's *Notice of Availability of the Draft Resource Management Plan and Draft Environmental Impact Statement for the Grand Junction Field Office in Colorado* published in the *Federal Register* on Jan. 25 [FR Doc No: 2013-01400].

Founded in 1924, the AMA is a not-for-profit association and is the premier advocate of the motorcycling community, representing the interests of millions of on- and off-highway motorcyclists and all-terrain vehicle riders. Our mission is to promote the motorcycle lifestyle and protect the future of motorcycling.

The Notice of Availability is to allow public comments on the BLM's GJFO Draft RMP/Draft EIS. The AMA has concerns with the BLM's use of the term "wilderness characteristics" and with the BLM considering the option of using particulate matter concerns to prohibit the use of off-highway vehicles. The AMA also has issues with the GJFO's economic data and the scheduled public meetings.

The GJFO RMP identifies nearly 274,000 acres as areas that meet the criteria for wilderness characteristics within the planning area. Many of the areas identified with wilderness characteristics were Citizens' Wilderness proposals. According to the RMP, the BLM only accepted a proposal from the Colorado Environmental Coalition (now Conservation Colorado).

According to the GJFO RMP's preferred plan (Alternative B), the BLM intends to prohibit OHV use in many areas. Some of these areas identified by the BLM and/or the CWP include the following: Atwell Gulch, Juanita Arch, Mt. Garfield and the Palisade.

With the BLM's use of wilderness characteristics, the RMP resurrects the controversial Wild Lands policy killed by Congress in April 2011. The guidance manuals cited in the RMP includes language directly lifted from Interior Secretarial Order 3310 and its supporting documents, known as the Department of Interior's Wild Lands memo, illustrating how BLM employees are to identify and manage lands with wilderness characteristics.

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The AMA opposes the Wild Lands policy because it can restrict responsible OHV riding with little or no public input. The federal BLM is using the GJFO RMP process to advance de facto Wilderness through administrative fiat.

This GJFO RMP will allow officials in the federal BLM to manage public land as if it had received a "Wilderness" land-use designation from Congress, but without requiring congressional approval. If this GJFO RMP draft becomes the final plan, it will be a land grab and a blatant attempt to usurp congressional authority.

A Wilderness designation is one of the strictest forms of public land management. Once Congress designates an area as Wilderness, nearly all forms of non-pedestrian recreation are illegal. The AMA supports appropriate Wilderness designations that meet the criteria established by Congress in 1964, but anti-OHV advocates have been using the administrative and legislative process to ban responsible OHV recreation on public land.

In addition to the areas identified with wilderness characteristics, the BLM GJFO's RMP creates a new way to prohibit OHV use on the entire 1.1 million acres of the surface planning area. The preferred alternative will allow the BLM to "temporarily close off-highway vehicle (OHV) open areas and designated routes as needed during wind events to reduce particulate matter." Particulate Matter is "nuisance dust" commonly known as farm dust. The AMA understands there is an airport and interstate near Grand Junction and is willing to work with the BLM for safety reasons.

In other words, the BLM solely blames the use of OHV for disturbing "nuisance dust." What about other potential sources of nuisance dust, such as mountain bikes, humans, passenger and light-duty vehicles? What if there is a high wind warning when it is raining or snowing?

OHV recreation is a driving force for state and local economies. However, restrictions to access these public lands, including new Wilderness or land with wilderness characteristics designations, will be deleterious to OHV use and positive economic activity.

The federal BLM's GJFO RMP woefully undervalues economic contributions of recreation. For example, the GJFO RMP asserts a total recreational value "would generate nearly \$7.2 million in total spending, \$4.4 million in total value added and 90 full-time equivalent jobs by 2029."

However, a study by the Colorado Off-Highway Vehicle Coalition identified significant motorized recreational economic contributions for northwest and southwest Colorado, including Garfield and Mesa counties. Specifically, the report determined that "motorized recreation provides over \$141 million in spending to the GJFO planning area and 214 jobs directly related to motorized recreation."

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The GJFO scheduled five public meetings to allow the public to provide comments. The AMA applauds the BLM for scheduling these meetings. However, three of these meetings were scheduled within days of the GJFO RMP publishing date of Jan. 25. How can the public digest and comprehend the hundreds of pages within days to provide comments of any value? The AMA strongly encourages the BLM schedule additional meetings to allow the public to be more prepared and add value at these meetings.

It is incumbent on the BLM to fulfill its multiple-use mandate as outlined in the Multiple-Use Sustainable Yield Act of 1960. As a part of this mandate, the BLM should seek to preserve and expand responsible motorized recreational access to our public lands.

Thank you for your time and consideration of our comments. If you have questions, please do not hesitate to contact me by phone, (202) 742-4301, or by email, wallard@ama-cycle.org.

Sincerely,



Wayne Allard
Vice President, Government Relations