



October 22, 2014

Bureau of Land Management

Att: Joe Stout

Via email only at blm_wo_plan2@blm.gov

RE: Planning 2.0 comments

Dear Mr. Stout:

Please accept this correspondence as the comments of the above noted Organizations regarding the BLM Planning 2.0 proposal and related initiatives. Prior to addressing the specifics of these concerns, a brief summary of the Organizations is warranted. COHVCO is a grassroots advocacy organization of approximately 2,500 members seeking to represent, assist, educate, and empower all OHV recreationists in the protection and promotion of off-highway motorized recreation throughout Colorado. COHVCO is an environmental organization that advocates and promotes the responsible use and conservation of our public lands and natural resources to preserve their aesthetic and recreational qualities for future generations.

TPA is a 100 percent volunteer organization whose intention is to be a viable partner, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of trail riding. The TPA acts as an advocate of the sport and takes the necessary action to insure that the USFS and BLM allocate to trail riding a fair and equitable

percentage of access to public lands. Colorado Snowmobile Association ("CSA") was founded in 1970 to unite winter motorized recreationists across the state to enjoy their passion. CSA currently has 2,500 members. CSA has become the voice of organized snowmobiling seeking to advance, promote and preserve the sport of snowmobiling by working with Federal and state land management agencies and local, state and federal legislators. For purposes of these comments, Colorado Off-Highway Vehicle Coalition, the Trail Preservation Alliance and Colorado Snowmobile Association will be referred to as "the Organizations".

1. Executive Summary.

The Organizations support many of the principals that are expressed in the Planning 2.0 documentation but after a complete review of the Planning 2.0 documents and meeting found very little specific information to incorporate into comments. Much of these comments is based on examples provided to support the new planning principals, rather than materials directly created for the planning 2.0 process. The Organizations must express some concerns about implementation of the principals to date, as much of the work does not exemplify the principals of the Planning 2.0 Proposal. The Organizations understand BLM is entering a initial discussions regarding development of the new planning process based on the "Winning the Challenges of the Future: A road Map for Success in 2016" and BLM is calling this discussion the Planning 2.0 initiative ("the Proposal"). The Proposal seeks to: 1; Create a more dynamic and efficient planning process; 2. Enhance opportunities for collaborative planning; and 3: Plan across landscapes and at multiple scales. These are commendable goals, which the Organizations vigorously assert can only be achieved with the application of management on the ground based on an up to date and accurate review of all facets of problems impacting the management issue. It has been the Organizations experience that development of high quality balanced plans for any management concern has a long history of resolving management issues in a cost effective and rapid process. Truly resolving the management concerns on the ground must be a long term planning objective and simply must not be overlooked. Developing plans that are never implemented or that are out of date when adopted rarely resolves any management concerns, as limited resources will be diverted away from truly effective management.

The Organizations are very concerned that numerous examples of successful initial steps towards implementing the goals of the Planning 2.0 process have fallen well short of furthering the principals identified. The Organizations concerns are: 1. There has been **very** limited public outreach on the Proposal; 2. The funding source for the extensive new multi-level planning must be clearly identified; 3. Statutorily required partner involvement in the Planning 2.0 process appears very limited and has been totally non-existent in many of the examples relied

upon; 4. Much of the landscape level planning to date does not address multiple use requirements; and 5. BLM is seeking to accept citizen science in planning without identifying how that relates to best available science and BLM often relies on badly out of date science instead of clearly identified management documents for the species at the landscape level. The Organizations vigorously assert these concerns are foundational to achieving the objectives of the Proposal and must be resolved.

2. There has been very limited public outreach for the Proposal and many of related documents have been developed without public input.

The Organizations are very concerned that while BLM is seeking to develop a new national strategy for land management planning, only two public meetings have been held to date. This is very concerning by itself. The Organizations must also express concern over the limited public input in the development of the Rapid Ecological Assessments ("REA") and Landscape Conservation Cooperatives ("LCC") used as examples of the new planning process. This level of outreach is simply insufficient to meaningfully gain public input on a national level issues and landscape level plans that will be guiding field office resource plans. Often Field Office level plans have significantly more public meetings and opportunities to comment than have been provided on the Proposal to date. As more specifically addressed in subsequent portions of these comments, the complete lack of public and partner input has resulted in some serious foundational flaws in REA and LCC that have been developed to date.

The Organizations vigorously assert that significantly more public outreach must be done, and that these meetings must be held at various times and locations throughout the country. The Organizations do not believe that public meetings held on a Wednesday afternoon are viable for many of the public, especially those in the recreational community. Evening and weekend meetings at numerous geographically diverse locations throughout the country must be provided to allow for full public input to be obtained. Expanded public input will create a far superior and high quality planning process for the BLM to implement moving forward.

3. Specific funding for new multi-level planning must be identified.

There is a critical step in the Proposal that has not been clearly addressed to date, mainly how the expanded planning process, and associated NEPA analysis, is going to be funded from inception to completion of on the ground projects. This is a critical question that must be resolved. The identification of funding sources for expanded NEPA management/analysis will become more critical with the expansion of multi-level planning in the Proposal, as most of this planning is going to require NEPA analysis. NEPA analysis is often time consuming and

expensive, and there appears to be the desire to undertake more of this type of analysis. Simply creating landscape level plans and coordinating these plans with ongoing scientific development will take significant funds, and this funding should not be obtained at the expense of on the ground projects. It has been the Organizations experience that identifying funding for any planning or management has been a significant issue for BLM field offices and one that BLM appears to continue to struggle with. Often at the field office level there is simply no funding for a wide variety of issues, and often OHV grant programs provide the overwhelming funding for all multiple use recreation management. While the new planning process may look great on paper, it still must be applied on the ground and consistent funding will be a critical component of any effective long term planning.

When questions regarding funding of the new process were posed in the Denver meeting, BLM representatives asserted that the new planning process would be so streamlined and efficient that there would be more planning and more money for implementation. This response appears overly optimistic and failed to incorporate the experiences of the USFS with their new planning rule and early adopter forests. The lessons of the USFS process should be highly relevant to the BLM, as both planning efforts seek to achieve similar goals in a similar timeframe. It is the Organizations understanding that early adopter USFS planning areas have found their new planning rule slower and more expensive to begin with expanded collaboration of partners being required. The identification of funding for the wide range of new planning must be determined, and without resolving this fundamental question the effectiveness of any new planning process will be directly at risk as funding will not be sufficient to support expanded planning and implementation of planning decisions on the ground.

4. Landscape level planning will only be effective if it is meaningfully undertaken.

While the Organizations commend the DOI for their interest and lead in addressing global climate change in the planning process, the Organizations must note that there are many factors that are impacting DOI lands and specific species that are not related to climate change and must still be managed. The Organizations vigorously support the idea that certain management issues can be effectively addressed at the landscape level. The Organizations have been actively involved with the USFS and USFWS regional efforts on various species including the Canadian Lynx and Wolverine and the Desert Renewable Energy Conservation Plan and recognize that these landscape level plans have been reasonably effective in benefitting the issues. These were extensive documents that were based on best available science for a wide range of multiple usages, which took years to develop. This level of analysis and review does not appear to be present in many of the REA and LCC that have been developed to date.

The Planning 2.0 proposal seeks to develop new landscape level plans on a variety of issues to guide the subsequent development of field office level plans, which the Organization support as an effective tool to deal with specific issues. In the Denver meeting, examples of landscape level plans and successful development processes under the revised Planning 2.0 process principals, included BLM Sage Grouse Planning, Rapid Ecological Response ("REA") and Landscape Conservation Cooperatives ("LCC"). Rather than being examples of how the objectives of the new planning process principals have been successfully applied, it is the Organizations position these plans are examples of what can happen when the principals and objectives of the Planning 2.0 Proposal are ***not*** applied properly.

The Organizations have been involved in the BLM Sage Grouse planning, and believe declaring that plan process a success and the model for a new planning process is somewhat premature. The Organizations would note that the primary goal of the BLM planning process was to avoid the listing of the Greater Sage Grouse as a threatened species under the Endangered Species Act. As that decision has yet to be made by the USFWS, any conclusions on the effectiveness of this planning effort would be premature as well.

The Sage Grouse planning process also highlights several failures to achieve the principals of the 2.0 Proposal, including increased collaborative planning with partners. The Western Governors Association aptly summarized state and local participation in the landscape Sage Grouse planning process as an "afterthought" in correspondence to the BLM and USFS¹, as often stakeholders in the Sage Grouse process were not meaningfully engaged and input was not meaningfully incorporated in final versions of the RMP. Similar sentiments have been vigorously expressed from a large number of Congressman and Senators in response to the Sage Grouse planning process. It is difficult to reconcile these statements with agency assertions that the Sage Grouse planning process has successfully expanded collaborative planning. It is the Organizations position that there is significant room for improvement in the process relied on in the Sage Grouse initiatives relative to the principals relied on in the 2.0 Proposal.

In the Sage Grouse Planning process, many local partners in the habitat areas have effectively managed local sage grouse issues for years and have significant data to support the effectiveness of this management in a manner that has directly and clearly benefitted sage grouse populations. Simply reconciling the BLM landscape level planning with these highly effective local planning efforts has proven problematic, resulting in frustration of partners. Many local partners have expressed serious concerns about basic information relied on in the

¹ See, <http://www.westgov.org/news/298-news-2014/800-western-governors-concerned-federal-work-with-states-on-sage-grouse-conservation-an-afterthought-see-clear-concise-input>

BLM landscape level Sage Grouse planning process, such as population of sage grouse and threats to the species identified in the National Technical Team ("NTT") Report. The NTT report often relied on theoretical information that seriously conflicted with significant portions of high quality localized data available. Localized threats to the Sage Grouse is an issue where there appears to be significant conflict between the various BLM landscape plans and best available science from local partners. These conflicts were so severe that the BLM was forced to issue a 66 page supplement to the NTT report to address the issues that were raised by partners once the NTT report was released. This change would require at least a review of more localized Sage Grouse plans developed in the amendment process to insure the revised NTT has been properly addressed in these more localized plans. This type of process would indicate a serious concern about collaborating with partner organizations and that development of an effective and efficient plan will be the result of the Sage Grouse Planning.

REA were also identified as a second example of effective implementation of the Planning 2.0 principals and objectives. The Organizations¹ are aware that the principal of an REA has been effectively applied to management of a wide range of parks and other issues, but this process is not a replacement for quality input. The Organizations are very concerned with the process that has been relied on by BLM in the development of the Rapid Ecological Assessment (REA) plans, as BLM appears to have chosen to merely hire a contractor to prepare the Colorado Plateau Rapid Ecological Assessment ("CPREA") rather than involve the public and partners². The Organizations are not aware of any public/partner input being sought for the development of these documents, despite these documents now being relied on to guide the development of field office plans on a variety of issues. This is very troubling and fails to provide the basis for success in BLM achieving its goals of the Planning 2.0 process. More specific concerns with the management proposed in these REA regarding a particular species are discussed subsequently in these comments.

The third example of effective implementation of 2.0 proposal principals in the Denver meeting and supporting documentation was the development of LCC partnerships. The Organizations were not familiar with BLM efforts regarding the development of LCC at the time of the Denver meeting. Subsequent evaluation of this issue recognized that the LCC website identifies 22 of LCC plans currently in place in the country, and that several have been in place for multiple years. As a result, one would expect detailed examples of how these LCC are working with partners to be easily available for public discussion. That simply is not the case and providing meaningful comments on these initiatives is difficult as many of the links on the LCC website³

² See, <http://consbio.org/products/projects/blm-rapid-ecological-assessment-rea-colorado-plateau>

³ <http://lccnetwork.org/> accessed 10/15/14

are dead or provide at best general information. Only two non-DOI partners are even identified in the national brochure on the program.

The national LCC guidance brochure for the public providing quality examples of how the LCC have been developed with expanded partner involvement, as often the national LCC brochure provides information is in the form of somewhat random comments of DOI agencies that often do not relate to the goals and objectives of the LCC process. Examples of these comments include:

"Glorious fall foliage provides a backdrop for foraging Sandhill cranes."⁴ or

"A majestic bull elk pauses for a drink in the southern Rockies."⁵

These types of random statements are often highly frustrating to many partners and more properly suited as a note to a picture in a travel brochure rather than part of a mission statement for meaningfully undertaken landscape planning that will result in effective and efficient management of issues on the ground. Frustrations are compounded when there is no picture to relate the note too, as is in the LCC brochure. The Organizations assert these efforts fall well short of seeking best available science and a more dynamic and streamlined planning process with expanded collaboration of the public and partners, even if the statements are largely symbolic.

Further numerous comments in the national LCC brochure attribute issue specific statements to agencies that are completely unrelated to that agency's mission or expertise. An example of such a quote would be the following quote attributed to NOAA:

"Preserving cultural artifacts and traditions creates vibrant, healthy communities."⁶

While NOAA is an impressive organization that does great work, NOAA's expertise is not in cultural resources and the Organizations must question any decision that sought to rely on NOAA in such a capacity. There are a wide range of true partner organizations that have long histories of effective management of this issue, such as state historic preservation offices and

⁴ See, Department of Interior, Landscape Conservation Cooperatives Brochure - undated at page 3. available at http://lccnetwork.org/Media/Default/Misc/LCC_brochure_web.pdf

⁵ See, Department of Interior, Landscape Conservation Cooperatives Brochure - undated at page 1. available at http://lccnetwork.org/Media/Default/Misc/LCC_brochure_web.pdf

⁶ See, Department of Interior, Landscape Conservation Cooperatives Brochure - undated at page 2. available at http://lccnetwork.org/Media/Default/Misc/LCC_brochure_web.pdf

the national register of historic places, and failing to rely on these organizations for their expertise may complicate partnerships with them in the future.

While these statements are largely symbolic, development of landscape plans and related coordination with partners will require significant efforts to develop high quality decisions that can be effectively applied. The implications of these types of statements to partners should not be overlooked as many partners operate with limited budgets and are highly interested in on the ground success in managing issues. These type of statements would not indicate a similar desire from BLM. rather partners could easily conclude high quality planning is ***not*** being developed in the new planning process, as much of this information provided to date appears to fall well short of high quality analysis necessary for more efficient and dynamic planning. This simply must be resolved in order to achieve the objectives of the Planning 2.0 Proposal.

4b. The Organizations concerns regarding impacts from inaccurate REA are not abstract.

The Organizations are very concerned regarding the failure to develop meaningful public/partner input in the development of the REA development process and the long term implications of these failures. This failure will result in limited funds for the management of issues being directed away from resolution of the true factors towards other issues. These concerns have already manifested themselves in response to the REA and planning 2.0 proposal process as the Wilderness Society has asserted that REA are now the proper basis for all management.⁷ Given the prima facie failures of the REA development process to address a wide range of issues, the Organizations are not optimistic that any management undertaken would be effective. Rather than streamlining the process, the application of inaccurate and out of date will be an additional barrier development of effective management on the ground at the field office level.

5a. Statutorily required partner involvement in all phases of planning must be protected.

The Organizations must note that partner involvement at the Denver meeting was surprisingly limited, which compounds concerns about limited public/partner involvement in the new planning process and overreliance on contractors as a substitute for public input. The meeting was well attended by environmental organizations, but traditional partners who provide ongoing funding and support to BLM, such as State and local government agencies and user groups were almost non-existent. This was very concerning as many of these partners are either required to be involved in the BLM planning process by federal law or as the result of consulting agency agreements that have been signed with BLM. The Winning Challenges document that was the basis for the Planning 2.0 process simply has no partner quotes, and

⁷ http://wilderness.org/sites/default/files/TWS%20--%20BLM%20report_0.pdf

relies on quotes from unspecified DOI employees for a large part of the document. Again, engaging partners is often difficult as many partners and users have exceptionally busy schedules and symbolic gestures do have meaning to these organizations. The impacts of these largely symbolic gestures to partners must not be overlooked.

Expanding collaboration in Planning 2.0 process entails significantly more outreach and engagement of existing partners than is currently proposed and this level of engagement requires more than two meetings and make meetings at times when the public/partners can attend. Experiences with the Sage Grouse planning process have shown that engaging partners will be a major key to success moving forward at the landscape level and often engaging partners was highly site and project specific. The Sage Grouse planning process revealed that there are a wide range of partners necessary for landscape level planning, including state and local government agencies, and private land owners. While DOI is a major land holder at landscape level planning, Sage Grouse planning efforts identified in some habitat areas private lands accounted for more than 50% of the habitat, making full utilization of collaboration of public and private landowners critical. This type of engagement is fluid and highly specific to the particular management issue, as exemplified in the Sage Grouse process where some private lands were highly developed residential subdivisions while other private habitat lands were large ranches which had already engaged in conservation easements for the benefit of the Sage Grouse. Insuring proper partner engagement for a particular project must be a priority.

A critical component of any revised planning process must be to repair partnerships that are currently strained as a result of poor engagement previously. It is the Organizations experience that there are many partnerships with BLM that are severely strained for this reason. An example of this strained relationship with historically strong partners would be from Colorado, where many of the BLM field offices employ good management crews for trail maintenance funded entirely by grants from the Colorado Parks and Wildlife OHV grant program. A troubling number of these crews are at risk of losing funding simply due to a failure to operate within the grant criteria. Asserting more partner input is desired and then not addressing these types of issues will not resolve these types of tensions.

Partnerships between local governments and BLM representatives have also been strained for a variety of reasons as well. An example of this type of issue would be the community development for the Hermosa Watershed legislation (HR 1839) which seeks to remedy significant changes to historical management of BLM lands resulting from new policy manuals. The Hermosa Watershed Legislation is sponsored by Rep. Tipton and Senator Bennett and has a long stakeholder process as the basis for the Legislation, including numerous local government

representatives and user groups. Throughout this process there was significant frustration expressed regarding BLM failure to address credible community input on issues and often community representatives were relied on to provide historical documentation supporting prior management decisions. After partners provided requested documentation, meaningful discussion did not occur and often the reasoning underlying the need to change these historical management decisions was not provided. Relationships were further strained in the process as BLM representatives were involved in the stakeholder meetings but failed to mention significant management changes in a recently released final version of a resource management plan for the planning area that would have rendered the entire stakeholder process irrelevant. This is not the way to work collaboratively with stakeholders and will result in significantly strained relations with stakeholders moving forward. Attempting to expand future collaboration with these partners would be difficult without addressing these type of historical stressors.

These strained relationships simply must be repaired to insure that planning can be conducted at the landscape level and then carried through to application on the ground. Developing high quality planning that actively seeks to including all partner organizations would be a step in the right direction, and the Organizations are concerned this engagement is not occurring at this point with LCC and REA. Failing to actively engage these partners will only result in further fracturing of already strained relationships.

5b. USFS experiences in development of their new planning rule must be addressed.

The Organizations are aware that the USFS is developing a new forest planning process that seeks to achieve many of the same goals and objectives as the BLM's 2.0 proposal. Given the similarity in the timing of these two process, the Organizations believe there must be high levels of information being exchanged between the agencies with regard to these processes. Both the BLM and USFS stumbling at the same points in development of their planning process makes little sense and must be avoided. The USFS has incorporated a vigorous public input process and established FACA committees for implementation of the new planning rule in order to avoid many of the problems that are now arising with the REA and LCC being developed by BLM. This experience would be highly relevant to development of the 2.0 proposal moving forward.

The need to manage in compliance with rapidly evolving bodies of research is specifically identified as a major concern for the BLM moving forward, as identified in the 2008 BLM Science Strategy, which states:

“In this era of rapidly expanding knowledge and methodologies of predicting future environmental changes, it is critical to keep up with the state of knowledge in resource management. By making use of the most up-to-date and accurate science and technology and working with scientific and technical experts of other organizations, we will be able to do the best job of managing the land for its environmental, scientific, social, and economic benefits.”⁸

The role that strategic planning documents play in determining the resources currently available and in identifying those resources that need to be developed is specifically and extensively discussed in the provisions of the 2008 BLM science strategy. This discussion specifically identifies:

“National management issues will be focused to reflect how they apply to the various biogeographic regions of the United States. The BLM identifies and prioritizes the science needs and problems that threaten the targets and goals from the National Strategy. Targets are established for managing specific goals or objectives.....The science needed to address the regional management issues will be defined. Science may include existing resource inventory, monitoring, and other data, as well as new information derived from research and project efforts.”⁹

BLM’s Science Strategy identifies a wide range of scientific research partners for the exchange of credible information and to be used to address issues that may arise. One of these partners is the US Forest Service¹⁰, making the extensive works of the Forest Service’s research stations cited in these comments and experiences of the USFS in development of their new planning process fully applicable to management of BLM lands under new management processes.

5c. Comparisons to the newly released DRECP provide stark differences plan developments between LCC and REA developed to date.

The Organizations would be remiss in not addressing the stark differences between the REA and LCC that have been developed and the recently released Draft Desert Renewable Energy Conservation Plan ("DRECP"). The Organizations believe these comparisons are highly relevant given the similarity in timing of development of the plans. The collaboration efforts involved in the DRECP plan were the result of more than 40 meetings and an extensive subsequent stakeholder process subsequent to these meetings. The Organizations are not aware of any

⁸ BLM Science Strategy 2008 – Doc Id BLM/RS/PL-00/001+1700 at pg iv.

⁹ *Id* at 16.

¹⁰ *Id* at pg 10.

public process for the REA or LCC development to date, despite plans on these issues being released in final version.

DRECP process convened nationally recognized experts with the stakeholder panel to address a variety of management issues as part of the DRECP process and insure that best available science was being applied in the DRECP. This process allowed for exceptionally meaningful resolution of concerns of stakeholders in the DRECP in a truly dynamic and efficient manner. Stakeholders were able to raise possible gaps in science with national experts and the experts were able to resolve if that perceived gap was truly a gap in research or was an issue that had not been more extensively researched as it had been clearly identified as a nonissue for the species. The Organizations submit that many of the shortfalls that are identified in the final REA and LCC would have been immediately addressed and resolved if a public process similar to the one developed for the DRECP had been used for the REA and LCC.

The DRECP addresses a wide range of multiple usage management concerns in relation to renewable energy development moving forward. As previously noted the LCC and REA developed are very targeted to particular issues and often fail to include the recreational/multiple use community in these plans. If landscape level multiple use management could be effectively targeted at only particular issues it would simplify the planning process, but experience has taught the Organizations that resolving any problem in a multiple use framework is difficult. Achieving any resolution of issues is even more difficult and complex when all multiple users are not at the table. The Organizations believe that the DRECP process provides a viable and effective framework for achieving many of the goals sought to be addressed in the 2.0 proposal and must be used as a benchmark for comparison.

6. Multiple usage must be addressed in the Planning 2.0 process.

Obtaining the proper balance of statutorily required multiple usage partners and interests in the new landscape level planning process is also a concern after a review of the LCC and REA documents. Frequently in the supporting documents for the REA and LCC process, numerous Secretarial Orders are referenced as the basis for these plans but no methodology is identified regarding incorporation of the changes resulting from these Secretarial Orders to allow them to operate in the multiple use planning framework required by federal law. Omitting partners or interests in these types of landscape level discussions will hamper on the ground implementation of these decisions as contradictory or insufficient planning may be provided at the landscape level.

Again the Sage Grouse planning process provides good examples of why the Organizations are concerned. The Organizations experiences with the landscape level Sage Grouse plans found

that often the management standards on a variety of issues were overly specific and failed to address impacts to other multiple uses beyond the usage specifically identified. The relationship of new landscape plans standards to draft field office plans being developed at the same time were often not provided and often analysis of the planning areas for compliance with new standards was never addressed in the landscape level process. An example of the landscape level plans conflicts encountered would be that no explanation was provided on how recreational usage of sage grouse habitat areas was identified as "not a threat" to habitat quality in landscape level plans but roads and trails in habitat areas were identified as a threat to the Grouse habitat quality in field office level plans. The Organizations must question how recreational usage can occur in habitat areas without roads and trails to access these areas. These are the type of multiple use issues that must be clearly resolved and failure to do so will make implementation difficult at best and minimize any long term savings.

7a. Citizen science is not a replacement for best available science.

In the Denver public meeting, BLM representatives repeatedly stated that expanded incorporation of citizen science in planning would be a benefit of the new planning process. The Organizations believe that a complete review of all science available on particular management issues must be undertaken to identify possible gaps in research prior to determining any next steps in management. This review would be highly effective in developing targeted research on particular issues. The Organizations believe that asserting there is a gap in research and new science is need, when there is valid peer reviewed science on the issue is a problem and would result in significant diverting of limited resources to issues that will never benefit the species.

As more extensively discussed in subsequent portions of these comments, the Organizations are deeply concerned that this review of existing science has not occurred in the REA and LCC development process. Often existing landscape level resources for a variety of management issues that already provide clear and concise summaries of threats and management issues for a species are simply not been incorporated in the REA and LCC process, including existing Landscape Conservation Assessments and Strategies for a large number of threatened or Endangered species that have been signed by BLM representatives. Too often CAS are not addressed or management provided by the REA and LCC directly conflict with the threats and management priorities of the CAS, despite the long history of partner development of the CAS and peer review. This is simply unacceptable.

Adopting citizen science is admirable but at no point was the relationship between statutory requirements for best available science application in all federal planning and the new citizen science now to be adopted explained. In a troubling development, citizen science was not even

defined in the Denver meeting. Incorporating legally insufficient research into the planning process will simply result in more litigation and bad plans being developed that attempt to manage concerns in a manner that will simply never address the problems to be managed.

While integration of best available science will streamline planning, this process is very different than accepting citizen science in an attempt to fill possible gaps in research. After reviewing the research that is relied on for much of the CPREA that have been finalized at this time, the Organizations must express concern regarding the application of this citizen science. Asserting citizen science is necessary to fill non-existent research gaps will not streamline the management process. As more completely addressed subsequently, the science relied on in the CPREA and SRLCC falls well short of best available science and simply provides the basis for on-going litigation, which must be avoided as it will result in significant additional expense in planning and delay in implementation of any management changes on the ground.

7b. Species specific management documents are often badly out of date or poorly summarized in the CPREA and LCC.

The Organizations would be remiss if concerns regarding the weakness of the scientific basis relied on for development of CPEA was not specifically addressed in these comments. It has been the Organizations experience that only effective management of species can truly resolving population concerns for any species. The Organizations must also note that a vigorous public process for the development of the CPREA would have addressed many of the issues noted below. For purposes of this portion of the comments, the Colorado Plateau REA ("CPREA") is used as an example as it is one of the new REA that has been finalized at this time. Much of the science relied on in the CPREA is badly out of date and simply fails to address the primary threats to the species. Often the CPREA analysis fails to even identify management standards and threat prioritization provided in many of the CAS that the BLM has signed for the species. Experience has taught the Organizations that a brief accurate summary of an ESA issue can be highly valuable in allowing agencies to respond to issues.

Other significant regional landscape management issues are simply never addressed in the CPREA, such as mountain pine beetle epidemics, despite specific identification of these types of concerns as a management priority in the Secretarial Order #3289. The USFS found this issue to be significant enough to warrant developing an emergency response team for the issue for many regions in the Western US. The Organizations are puzzled as to how the mountain pine beetle issue would not have been addressed at all in the CPREA given the overlap of the planning areas, similarity of time, and identification of invasive species as a management priority in DOI Secretarial Orders. Again a complete analysis of all issues to the species is critical in resolving issues on the ground and creating a dynamic and cost efficient planning process.

The Organizations first must stress their experiences with the planning process at the field office level, and the important resource that an accurate summary of the priority threats and concerns for each species could be in the field office planning process. Often BLM staff at the field office level are species generalists rather than experts on each species in the planning area. As a result, a short summary of the primary management concerns of each species could be a huge resource to field office staff. 38% of species specific analysis in the CPREA have no summaries of the threats to the species at all. Rather than provide this resource, it is the Organizations position that the current CPREA species analysis does nothing more than lay the ground work for a very difficult §7 ESA consultation for any RMP that was developed based on the CPREA. This would not be cost effective or dynamic and simply must be avoided.

The Organizations believe a brief comparison of the information provided in the CPREA on three species will provide stark examples of the basis of the Organizations concern on this issue. The first species where the CPREA provides problematic analysis of species management issues is big horn sheep, despite the fact the CPREA cites to the CAS. Bighorn sheep analysis in the CPREA identified 18 different threats to the species but completely fails to prioritize these threats or identify that the CAS clearly states that disease from domestic sheep is the overwhelming threat to the species. The Organizations must question how valuable this type of analysis is for local management, especially when compared to the clarity of management that is provided in the CAS, which clearly states:

"The relative importance of these threats to the persistence of bighorn sheep in Region 2 varies from area to area. However, the risk of disease outbreaks resulting from contact with domestic sheep and goats is widely believed to be the most significant threat facing bighorns in Region 2 and elsewhere across their range."¹¹

The Organizations are very concerned that the CAS has provided good management clarity on the threats to the species but for reasons that are unclear this management clarity is not carried through in the CPREA.

The second species where the CPREA provides a problematic analysis of research on the threats to a species is the Colorado River Cutthroat Trout. The CPREA analysis of Colorado River Cutthroat Trout management issues provides a stunning example of the reliance on badly out of date science and the impact that could result from lack of a quality summary of the threats

¹¹ See, Beecham, J.J. Jr., C.P. Collins, and T.D. Reynolds. (2007, February 12). Rocky Mountain Bighorn Sheep (*Ovis canadensis*): a technical conservation assessment. [Online]. USDA Forest Service, Rocky Mountain Region. Available: <http://www.fs.fed.us/r2/projects/scp/assessments/rockymountainbighornsheep.pdf>.

to the species in the planning process. The CPREA relies solely on two studies (one from 1978 and the second from 1982) as controlling for Cutthroat Management issues. This assertion is astonishing to the Organizations as multiple state directors for BLM and USFWS are signatories to the 2006 Conservation Assessment and Conservation Strategy for the Colorado River Cutthroat Trout. Why the 2006 Conservation Assessment and Strategy would not be the starting point for analysis of Colorado River Cutthroat Trout issues simply puzzles the Organizations, as the CAS are often the benchmark of comparison between best available science and local planning efforts and are designed to function in exactly the same manner as the newly developed LCC and REA.

The 2006 Colorado River Cutthroat Conservation Assessment and Strategy clearly identifies that invasive species are the overwhelming threat to the Colorado river cutthroat trout, stating as follows:

"Colorado River cutthroat trout have hybridized with non-native salmonids in many areas, reducing the genetic integrity of this subspecies. As such, hybridization is clearly recognized as a major influence upon CRCT status."¹²

Recent scientific updates have identified how overwhelmingly significant the hybridization issue for native trout species.¹³ Rather than meaningfully address this issue as the primary threat to the species and update that science, the CPREA merely identifies invasive species as one of 16 different factors that are causing the decline of the species. The Organizations would not be optimistic that effective Cutthroat management could be developed based on the CPREA analysis.

The failure to properly apply best available science to Colorado River Cutthroat Trout species is not limited to CPREA, as the Southern Rockies Landscape Conservation Cooperative ("SRLCC") carries this reliance on poor science forward on the Colorado River Cutthroat trout issue stating:

"Bonneville cutthroat trout are one of 14 subspecies of cutthroat trout native to

¹² See, CRCT Coordination Team. 2006. Conservation strategy for Colorado River cutthroat trout (*Oncorhynchus clarkii pleuriticus*) in the States of Colorado, Utah, and Wyoming. Colorado Division of Wildlife, Fort Collins. 24p. at pg 5.

¹³ See, Metcalf et al; *Historical stocking data and 19th century DNA reveal human-induced changes to native diversity and distribution of cutthroat*; Molecular Ecology (2012) 21, 5194–5207.

interior regions of western North America. Due to warming climate, these cutthroats became stranded in high mountain streams where they survived for many years."¹⁴

As previously noted, the primary threat to genetically pure fish is the stocking of hybrid fish that outperform the native species under a wide variety of habitat conditions. Research overwhelmingly indicates that isolation of native fish species, as the result of natural or man-made barriers from the reintroduced hybrid fish is the primary reason the genetically pure fish have survived. The Organizations believe that failing to address this issue in management will result in little benefit to the species, no matter how effective any management of climate change impacts may be.

The final species where concerns must be expressed about the REA/LCC summary is the Greater Sage Grouse, which presents a slightly different issue in terms of reflecting best available science. On this species the supplemental documentation on this species is up to date and provides an extensive discussion of threats of oil and gas development. The Organizations would note that there are many other issues in sage grouse management that would also need to be summarized in some manner to allow for effective management of the species. The recently released USGS summary of Sage Grouse threats identified wildfire as the primary threat to the species. The Organizations would note that this analysis is equally relevant to the Gunnison Sage Grouse populations based on best available research, which should have been noted.

The Organizations also note that there has been significant research released since 2010, much of which has brought extensive new research to light on this species. This new information would include the fact that abnormally high rainfall in the CPREA planning area has resulted in significant increases in Sage Grouse populations despite continued oil and gas activity in the planning area. The Organizations are also aware that Colorado Parks and Wildlife has recently released the results of several years of research addressing possible impacts of roads on Sage Grouse habitat and this research indicates a very weak relationship between high speed arterial roads and sage grouse habitat quality. The CPREA may be out of date already on these issues, and determining the proper manner to effectively keep research up to date must be addressed.

8. The Organizations welcome statements that BLM travel management decisions will be made at a more local level moving forward.

¹⁴ See, DOI Landscape Conservation Cooperatives, *Southern Rockies Landscape Conservation Cooperatives Activities and Accomplishments 2012* at pg 4.

The Organizations welcomed the repeated assertions in the Denver meeting that the BLM was moving away from field office level travel planning in favor of more localized management decisions. After participating in numerous field office level travel plans, the Organizations believe moving to a more localized analysis level makes a lot of sense. Too often important areas or routes are lost at the Field Office level analysis as users are asked to review decisions impacting hundreds of thousands of acres. This type of request simply overwhelms most users and often users are not able to identify omissions from maps of routes provided in decisions in field office level proposals in the short public comment period. Identifying omissions in the travel process is as important to the final decision as addressing particular routes, as any route that is not identified as open in the decision document is closed.

9. Conclusion.

The Organizations support many of the principals that are expressed in the Planning 2.0 documentation. The Organizations must express some concerns about implementation of the principals to date, as much of the work does not exemplify the principals of the Planning 2.0 Proposal. The Organizations are very concerned that numerous examples of successful initial steps towards implementing the goals of the Planning 2.0 process have fallen well short of furthering the principals identified. The Organizations concerns are: 1. There has been ***very*** limited public outreach on the Proposal; 2. The source of funding for the extensive new multi-level planning must be clearly identified; 3. Statutorily required partner involvement in the Planning 2.0 process appears very limited and has been non-existent in many of the examples relied upon; 4. There appears to be inadequate protections of multiple use in the planning process; and 5. BLM is seeking to accept citizen science in planning without identifying how that relates to best available science. The Organizations vigorously assert these concerns are foundational to achieving the objectives of the Proposal and must be resolved.

If you have questions please feel free to contact Scott Jones, Esq. at 508 Ashford Drive, Longmont, CO 80504. His phone is (518)281-5810 and his email is scott.jones46@yahoo.com.

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