



October 6, 2023

BLM

Via email at blm_hq_recreation_feedback@blm.gov

RE: BLM 21st Century Blueprint for Recreation Strategy
& Community Engagement Strategy

Dear Sirs:

Please accept this correspondence as the input of the above Organizations about the recently released BLM 21st Century Blueprint for Recreation Strategy ("The Recreation Strategy") and the BLM new Community Engagement Strategy that was coreleased with the Recreation Strategy. The Organizations have concerns across these documents that are centered around three general concepts:

1. The limited public engagement process that has been undertaken with both Proposals;

2. The failure of either document to address the significant staffing shortages that the BLM is currently facing as a barrier to achieving any of the goals of the strategy; and
3. The relationship of the documents to other planning efforts was never addressed.

Our members and partners have had the opportunity to attend several of the meetings on the Recreation Strategy, and found these meetings to be somewhat disorganized and attended by a large number of persons who lacked even a basic understanding of the proposal and current efforts of partners. Several of our members attended the in-person meeting in Las Vegas hosted by the Foundation for Public Lands around the Recreation Strategy and found the effort to be somewhat confusing and often seeking to achieve multiple goals at the same time. We believe the consolidation of multiple initiatives into a single event was done in an attempt to create efficiency. We are concerned this model has created more problems than it resolved as often the scope of issues being addressed was confused and paths forward on particular were not clearly provided. We are worried about the success of a public engagement strategy that fails to engage with the public in its development or after its release.

These comments are based on our Organizations partnerships with all levels of government managers in providing sustainable recreational opportunities for all on public lands for more than 50 years. Our partnerships with all levels of land managers are unique, given the large amount of funding that our voluntarily created registration programs provide to the managers to support basic operations on public lands. These partnerships provide between \$200 and \$300 million per year to all levels of managers for the benefit of all users. Unlike most other users we often provide funding to perform the NEPA, hire BLM staff to manage the area, enforce seasonal closures to protect resources and long-term consistent funding to maintain the infrastructure that is built. This highly advanced partnership creates significantly different challenges that most other partners are encountering. Our hope would be that these comments allow these challenges to be addressed and allow our partnerships to continue to evolve as many of our groups have

exceptional relationships with land managers that we would like to expand and adapt to current and future challenges. We also hope that with resolution of these challenges other partners will be allowed to a far more advanced level of partnership with managers and expand recreational capacity even greater in the long run.

1a. The Recreation Strategy needs far more public engagement.

The Organizations are very concerned that the Recreation Strategy and Community Engagement Strategy was released after very little public engagement during development and very little public engagement after its release to the public. We are not aware of any comment periods being provided for public input before the Recreation Strategy was released. As far as we can tell there were only three meetings occurred nationally around the Recreation Strategy. This is a VERY different course of development from the efforts that have driven the USFS 10 Year Trail Strategy development and implementation. The USFS efforts have been based on years of public engagement that has remained ongoing throughout the implementation of the USFS effort. We would recommend that the BLM adopt the general direction of the USFS on this issue as BLM efforts to date are simply insufficient for the development of any national strategy. Failing to engage with partners to understand barriers to engagement and specific details and desires of the public which results in a Recreation Strategy that is unrelated public needs and desires. This failure to engage also sends a negative message to the public about the value placed on their desires for management and utilization of these resources.

The highly insufficient nature of the public engagement on the Recreation Strategy and Community Engagement Strategy is directly evidenced when any comparison to other planning efforts is made. Often the development of an Environmental Assessment for a highly localized effort will have significantly larger number of public meetings to engage the public through. This is an indication that engagement is insufficient.

1b. Public meetings have been confusing and slightly misdirected and VERY limited in nature.

Several of our members attended the Foundation for Public Lands meetings in Washington DC and Las Vegas, Nevada that coincided with the roll out of the Recreation Strategy. We were also able to attend the virtual meeting held on October 5, 2023. These meetings suffered from a weak foundation for engagement as most partners at the meetings were not notified that the Recreation Strategy was released prior to the meeting. This was compounded by the fact that meeting facilitators seemed to lack an understanding of efforts already in place with land managers and many of those attending lacked an understanding of existing efforts and resources that were already in place with partner efforts.

Our members generally found these meetings to be confusing when trying to identify the goals and objectives of this meeting as often attendees did not know if they were commenting on the Foundation development or the BLM strategy. Even after the meeting it was unclear if comments that were addressing the Recreation Strategy would be compiled and submitted to the BLM or if they would be used to guide future public engagement for the Recreation Strategy or were going to be used entirely internally with the Foundation. These are problematic challenges and questions for a document and effort that seeks to guide recreational usage of BLM lands for the foreseeable future. These problems only compound the need for an effective engagement process with the public for the BLM as exemplified by the lack of a clear next steps to be developed after the meetings.

The Organizations are unsure if partnering with fledgling organization, such as the Foundation for Public Lands, that is ramping up its own development and organizational mission is advisable as exclusive means of outreach for a national strategy. We are concerned that the two efforts occurring together will confuse the public on larger engagement efforts and result in less public engagement rather than better public engagement.

The confusion of the entities and intent of the meeting creates significant immediate concerns as the message of the meeting was somewhat contradictory in nature. Would it be proper for the BLM to be asking what can partners bring to BLM management? This type of question is a frequent topic of discussion as alignment of resources can be a major challenge between managers and partners. Existing partners should be leveraging and expanding efforts on BLM lands not engaging with new partners that could only serve as an additional administrative layer in projects. This type of a question becomes problematic, with the introduction of an entirely new partner that lacks a clear mission and defined goal and objective for participation.

The confusion involved in these meetings was compounded by the fact the relationship of partners was backwards. In our experiences new partners should be targeting input on what can the Foundation bring to the partners to facilitate and expand impacts on public lands. Rather than leveraging resources the tone of discussions often seemed to be what can partners bring to the Foundation rather than what can the Foundation bring to assist existing partners. Foundationally these are two different questions and while each are equally important, they are very different. While BLM staff participating in these meetings were well versed in recreational usage and existing partnerships, meeting facilitators seemed to lack this type of understanding despite their history of holding highly visible positions. Often panelists provided by the meeting facilitators seemed to lack engagement with the BLM and represented very small groups or interests. Rather than being national leaders, panelists were more aligned with a local club type level of engagement or were trying to address issues they had little background with. While these efforts were well intentioned this created immense confusion of basic issues and frustration for those attending. These issues only compounded other challenges such as who specifically is the group the public is engaging with. The conflicting nature of each of these questions will dilute the limited input that is provided and will also serve as a barrier to obtaining information from a targeted effort to develop input on efforts or challenges that partners may have overlooked in isolation. We also believe that many partners simply will not engage further in these discussions.

Another frustrating factor that should be addressed in any future efforts of this nature is the fact that the BLM has access to a wide range of existing tools that could be used for public engagement of strategies such as the 21st Century Blueprint and Community Engagement Strategy. BLM has many Recreation Advisory Councils (“RAC”) across the Country and it is our understanding that several are fully staffed and functioning. The RAC clearly have authority to provide informal guidance to the BLM on issues such as this. There are other partner groups, such as the Outdoor Recreation Roundtable that could have assisted as well. The members of the ORR are reasonably versed in BLM challenges, strengths and weaknesses and clearly would have taken the opportunity to provide input on issues such as what we raise in these comments if they had the opportunity.

BLM also has a wide range of highly effective partners that have developed a wide range of tools for the BLM in the past. An example of this would have been the National Off-Highway Vehicle Conservation Council (NOHVCC) that partnered with the BLM in development of the State motorized action plans for more than 30 years. This very concerning as most partners are immensely busy and are constantly forced to prioritize efforts and resources. Again, we must question the limited outreach and choice of a new group to undertake the public engagement. This simply must be improved.

2. Relationship of the Recreation Strategy to other planning documents must be addressed.

The Organizations are concerned that the BLM recently has undertaken a lot of various national efforts and initiatives, such as:

- the 21st Century Blueprint for Recreation,
- the Community outreach effort; and
- the recent Landscape Conservation and Sustainability Proposal.

While we welcome these discussions, we are also very concerned that these are efforts that appear to be developing in a silo isolated from each other rather than a coordinated strategy for

the agency to move forward with. This is very concerning as there are large amounts of ambiguity in the relationship between these various efforts and resolving this ambiguity is often critical for the success of efforts such as these. The Organizations are also concerned that this siloed management approach quickly leads to all efforts being prioritized as the number one priority for the agency. This situation will cause conflict and confusion of efforts rather than leveraging each effort to achieve goals.

We are also concerned that this siloed approach creates immediate conflict between the efforts. As we have noted in other portions of these comments, we are very concerned that the Recreation Strategy is seen VERY limited public engagement. We have similar concerns around the very limited public engagement that occurred with the development landscape sustainability proposal as well, as often massive concepts and initiatives were buried in a single sentence in the middle of the sustainability Rule. This situation is in direct conflict with the Community engagement initiative goals of engaging communities at all levels all the time, which is outlined as follows:

“Strategic Focus: Externally, the BLM will capitalize on its recreation brand of America’s “Backyard to Backcountry” treasure, consistently coordinating with community and regional landscape-level representatives when planning and managing recreation settings, services, and facilities; prioritize recreation areas that provide the most significant public benefits; and leverage financial resources through community partner organizations to ensure that top-priority sites and services are maintained.”¹

The failure of the Recreation Strategy to achieve this goal is problematic, leading us to questions about why these goals would not be aligned better, as the efforts were being developed at the same time. These are questions that are uncomfortable for us as partners to have to be asking after documents have been released and undermine our confidence in any of the efforts. As

¹ See, BLM Community Engagement Plan; Pg 2.

these efforts move forward, we are concerned that many other groups will ask many of these same questions and this will erode public confidence and support for these efforts even further. This is disappointing at best.

We are also concerned that throughout the engagement efforts strategy there is no recognition of the highly effective partner efforts that are currently in place and how those efforts will be addressed moving forward. This is very concerning again as many of the efforts and partners with BLM have already addressed goals such as updating planning documents in relevant areas. We are aware that there are large areas of BLM managed lands that have management plans that are horribly out of date, but there are also large areas of BLM lands that have newer plans in place. How does the community engagement effort relate to those areas? Again, this is another example of why these various efforts must be aligned with each other.

While partners are generally addressed in the Community Engagement strategy, these are often very generalized and abstract references. While these references are passing and generalized, this distinction is critical as many NGO partners can effectively address issues in manners that BLM or local government simply cannot. Often BLM is the direct recipient of these benefits, making these indirect relationships highly valuable to the BLM. A recent example type of interaction would be the recent successful requests from our Organizations, and a limited number of State partners, to the Federal Highways Administration for the issuance of waivers of Buy American/ Build American provisions in the Infrastructure Bill for the Recreational Trails Program. The RTP program provides \$84 million in funding to support all forms of recreation and in states with BLM lands, a large amount of this funding flows to the BLM for a wide range of programs. With the new BABA requirements, these funds would have become largely unusable but with the waiver program now in place these funds will continue to flow to BLM managed lands. These are minor distinctions that can have major implications to land managers.

3. Existing staffing challenges for BLM must be recognized in one of the strategic efforts.

The Organizations are very concerned that the relationship of these various plans to each other is never discussed and without basic alignment of the efforts, multiple plans may repeatedly address a single issue while other critically important issues may be overlooked. The Organizations are concerned that one of the foundational challenges we are seeing at all levels of BLM efforts is a horrible shortage of employees. This problem has only compounded and expanded since the events and challenges experienced since 2020 as most offices are only at 50% staff levels and many of staff that is in these offices is either acting or filling multiple roles. Too often our members are the constant in office or issue and the ever changing agency staff is the variable. The reversal of relationship presents major challenges to any management effort as partnerships and collaboration require high levels of trust and carry through on planning. Without addressing these basic issues, success will be very difficult for any planning effort no matter how well intentioned.

Our concerns around the failure to address staffing shortages is compounded as the community engagement strategy fails to mention staffing challenges as a concern. Even more concerning is the fact the community engagement plan appears to be taking the position that staffing is not an issue as there are broad goals for community engagement outlined and appear to assume sufficient staff is in place to achieve these goals. We would vigorously disagree with that assumption. The Organizations believe it is important to recognize that we are referring to currently open positions within the agency and not positions that are aspirational in the future.

Is this staffing shortage an issue that another strategy is addressing? Based on our years of partnerships with land managers, we can state that staffing challenges are the single largest barrier we have to working with all land managers. Prior to 2020 staffing levels had eroded and since 2020 staffing levels have simply collapsed. Too often our local members are trying to engage with offices that may have a position to engage with our members but that position has not been filled for years. Even if the position is filled, the person filling the position is in an “acting” role, and as a result has limited authority and is often trying to cover multiple positions. We are aware that acting staff is successful if they achieve some headway on one project. It is becoming FAR

too common for our local members to adopt a position of waiting until the position is permanently filled before trying to engage on issues, as it is simply less stress that trying to educate an acting person on the effort. Engagement of managers over the long term is the single largest intangible resource needed to achieve success on projects or initiatives and this requires each partner trust each other.

The Organizations believe the recognition of staffing challenges in the Recreation Strategy or in a consolidate manner across all planning efforts will also allow systemic barriers to be more effectively addressed. One such barrier would be the USAJOBS website and unified hiring processes. Generally, USAJOBS is difficult to work with and requires immense amounts of information that is unrelated to the position being sought. It has been the Organizations experience that often lower GS level positions are filled through local efforts and engagement of land managers in the local community and centralizing hiring processes are a major barrier to this type of engagement. Too often hiring windows on centralized platforms are open for short periods of time and during times of the year that are unrelated to the position being hired. Too often positions are offered months before the position can be filled and potential employees have taken other positions available sooner by the time the position can actually be started. These are barriers that could easily be resolved, but if these challenges are not recognized they will never be fixed.

Also, the failure to recognize staffing challenges in the Strategy sends a message to partners that are working hard to address this issue already. We are aware of numerous partners working with local or state BLM offices to address staffing challenges by adapting their partnership to leverage the comparative value of moving from a GS type position to a wage/hr. type of position and moving from a pure seasonal employee to a permanent seasonal type employee. Many partners are working to understand basic questions on federal hiring issues such as: Is the private sector more effectively addressing staffing challenges than the public sector?; what effect does salary have hiring?; Are land managers seeing more of a challenge than other government branches, such as Internal Revenue Service?; are state or local agencies having more success in hiring than

federal partners? Addressing questions and challenges such as this will not be successful if BLM does not want to address the lack of staffing. That is a concern. We are also concerned that failing to recognize staffing as an issue at all, sends a message to partners, and that message is not positive about their efforts. Again, this is a concern.

4. Conclusion.

The Organizations would vigorously request that far more public engagement be developed for each of these Proposals as high quality engagement with the public will develop better goals and objectives for moving forward. The Organizations also urge the BLM to use existing resources to achieve this public engagement rather than developing entirely new resources for this effort. High quality engagement can be achieved with current resources. The Organizations also believe that integration of each of these multiple planning efforts with each other must be achieved to ensure that critical shortfalls in achieving these efforts, such as the critical lack of staffing currently being experienced, do not delay successful implementation of the integrated planning efforts. The Organizations and our partners remain committed to providing high quality recreational resources on federal public lands while protecting resources and would welcome discussions on how to further these goals and objectives with new tools and resources. If you have questions, please feel free to contact Scott Jones, Esq. (518-281-5810 / scott.jones46@yahoo.com) or Fred Wiley (661-805-1393/ fwiley@orba.biz).


Respectfully Submitted,



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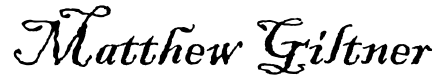


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