



May 2, 2013

Bureau of Land Management  
Att: Helen Hankins  
2850 Youngfield Street  
Lakewood, Colorado 80215-7093

RE: Economic analysis of recreation in BLM planning

Dear Ms. Hankins;

Please accept this correspondence as the Organizations' response to your correspondence dated March 28, 2013. The Organizations are very troubled that the basis and scope of our concern was not accurately conveyed in our original correspondence, as the Organizations agree with your positions on the comparative importance of particular activities you have highlighted regarding economics as a tool for balancing multiple use. Our concerns center on the fact this information should lead to consistency of analysis results between BLM and USFS conclusions, rather than the inconsistency that is the basis of our correspondence. The Organizations agree that an accurate analysis of multiple use activity is a critical component of balancing multiple uses on public lands in the planning process. The Organizations are intimately aware that economic calculations for recreation are frequently far more complex than calculations for production of other resources.

It is our hope that comparative spending issues can be resolved prior to the development and implementation of resource plans that may be critically flawed and significantly impact both the recreational opportunities in Colorado and the Colorado economy for a significant period of time

moving forward as recreational usage of public lands has been identified as the largest economic usage of public lands in the Western United States.

### **Plan specific concerns.**

Since the submission of our original correspondence on this issue, the Organizations have been actively seeking to obtain more information regarding the economic contribution analysis performed as part of the GJFO planning process with GJFO staff. It was our intent to obtain further professional review of the economic analysis process and conclusions, given the surprisingly low daily spending amount that was reached in the RMP. This outside analysis was going to be submitted in conjunction with the Organizations GJFO RMP specific comments. While the GJFO staff has been very helpful in this process, the investigation has led us to a very troubling conclusion, which we will be addressing in our formal comments. This conclusion is that there was no draft economic contribution report prepared as part of the planning process and a full report was only going to be produced for the FEIS and ROD. The lack of a draft report for use in the planning process is highly frustrating and will clearly impair the Organizations ability to undertake meaningful review of the process and calculations as part of the public comment process.

The Organizations believe the lack of a draft economic contribution report for staff to rely on in the planning process has directly impaired any ability to properly balance usage in the planning team meetings. While the Organizations are well versed on economic issues, entering a field office planning initiative without field office specific information would be a daunting task with the resources currently available to us. There are simply too many comparative spending issues and totals involved in the field office planning process to allow meaningful analysis and balance of multiple uses if the comparative information is not reasonably organized and available for discussion. No one could ever remember each user groups spending profile. The Organizations do not believe a proper balance of usage could be obtained in planning team meetings without a draft report of economic contributions and the lack of this document has directly contributed the high levels of frustration displayed by the public regarding the large scale closures proposed in the draft GJFO plan.

### **Comparison of per party spending and multipliers of certain user groups.**

The Organizations concerns regarding the possible misunderstanding around the basis of our original correspondence are evidenced by the discussion of the Forest Service NVUM calculation of recreational spending being based on a per party total. The Organizations agree that NVUM data is provided on a per party basis. The Organizations must note that the R2 Forest Service data concludes the per party spending average is \$1,059 dollars. The Organizations would note that this

total is never referenced in our correspondence, as this number does not translate well to comparison of other economic analysis documents. In an attempt to find a least common denominator for discussion, the average total party spend was divided by the average number of days the party stayed and the average number of persons in the party, which results in the average daily spend of \$61.92 per user. Similar calculations were performed on BLM totals for recreational activity and recreational visitor days and these calculations were then the basis of our correspondence to your office.

While the NVUM data is relied on for an average daily spend for all recreation on USFS lands, these materials were not the sole materials relied on for our concerns previously expressed. NVUM materials were supplemented with specific information on particular recreational user groups from State Agencies and user groups. Despite the wide range of sources of information sources, these findings are generally consistent with the USFS regional NVUM conclusions. Recent BLM analysis is the only research that is available that is inconsistent with the NVUM research. This consistency is exhibited as follows. The USFS NVUM research has concluded that hunters spend 2-3 times the average recreational user of public lands. Application of this multiplier to the regional NVUM average daily spend of \$61.92 would result in a hunting specific daily spend ranging from \$123.84 to \$185.76 per day. In 2008, CPW concluded the average daily hunting spending was \$106 per day for in state hunters and \$216 per day for out of state hunters. While these spending totals do not exactly correspond, the Organizations believe they are basically comparable spending amounts.

While the COHVCO economic contribution analysis relied on in our previous correspondence does not provide an average daily spending amount, the Organizations believe that the USFS NVUM estimation that average daily spending on motorized recreation is comparable to hunting is accurate and consistent with the overall COHVCO findings. This position is consistent with many other State and user groups analysis of motorized economic contribution within R2. An example of the consistency would be the recently released economic analysis of snowmobile users from the Wyoming Department of Parks. This analysis concluded that the in state snowmobiler spent \$98.29 and the average out of state snowmobiler spent \$159.80 per day and specifically excluded the cost of purchasing equipment from these calculations. The Organizations believe the USFS NVUM findings are again generally consistent with these conclusions, and provides further basis for our correspondence.

The application of the NVUM multiplier for hunting, camping and motorized recreation to the average spending totals found in BLM planning documents simply yields totals that are in no way consistent with the calculations provided in these State and User Group analysis referenced above. Application of the largest multiplier (3x) from the NVUM analysis to the highest per day recreational

spend in recent BLM planning (\$16.27) yields a total of \$ 48.81 for an average hunting or motorized user spend. The Organizations believe there is simply no factual argument that can be made that BLM spending is consistent with these separate analysis documents or the NVUM conclusions. These inconsistencies simply must be addressed to balance multiple usage.

**Planning unit analysis conclusions should be roughly consistent regardless of managing agency.**

The Organizations believe that a comparison of extreme ends of the spending spectrums found in the BLM and USFS NVUM regional data highlights the basis of our concerns regarding the inconsistency of conclusions. The R2 USFS unit with the lowest per day recreational spend is the Medicine Bow National Forest, which estimates their average daily recreational user spends \$20.70 per day. When this is compared to the highest recent BLM calculations of daily recreational user spending of \$16.27 on the Colorado River Valley Office, the end result is the Colorado River Valley daily spending is still almost 30% less than that found on the lowest USFS unit, which is adjacent to the CRVO. We believe this relationship is simply incorrect and must be reviewed, given the similarity and proximity of these planning areas.

The Organizations are also concerned that availability or loss of recreational opportunities are relied on to support existing BLM economic analysis. The Organizations again agree that most users will seek to access the closest recreational opportunity available for their desired experience, regardless of the federal agency ownership and any local issues will be mitigated by analysis of larger planning areas. It has been our experience that many users of dispersed recreational opportunities do not accurately know which federal agencies own much of the lands that are used for recreational activity, especially in border areas of agency ownership. The Organizations believe it is highly unlikely that any user will pass an opportunity to recreate simply because of the particular agency is providing the opportunity. Rather the desire to obtain close recreational opportunities regardless of agency would lead to consistency of findings for economic calculations between the agencies rather than the inconsistency that was the basis of the Organizations original correspondence.

**Economic contribution of skiing.**

In your reply, the impact of skiing is cited as a reason for the USFS NVUM regional data for average spending is significantly higher than the current BLM calculations. The Organizations agree that downhill skiing has a significant economic impact on the Colorado economy but this usage does not resolve our concerns regarding the undervaluation of recreation in BLM planning. Many USFS units in Region 2 do not have a significant skiing component in their spending and visitation profiles, such as the Shoshone NF and Big Horn NF in Wyoming. Even without skiing usage, the Shoshone NF

estimates the average daily spend to be \$55.43 and the Big Horn NF estimates an average user spend of \$64.86 per day. The Organizations believe these calculations result in numerous other recreational activities having similar spending profiles as skiing using these areas. The Organizations believe many of these activities are large recreational user groups of BLM lands which have been the subject of planning.

The Organizations also are aware there is a significant range of average spending for those seeking a downhill skiing experience at an improved resort facility, which would mitigate the overall impact of this usage at the regional level. Those spending a day at Beaver Creek Ski Resort will clearly have a much higher average spend than a user spending a day skiing at Monarch or Durango Mountain Resort. The Organizations are also aware that many users seeking a downhill skiing experience will not seek a developed resort but will choose to go into the back country as a hybrid skier or telemark skier. The Organizations are aware that avoiding a developed resort is a much lower cost alternative for those seeking a downhill ski experience. The Organizations are not aware of an average recreational daily spending total for skiing, and would like to avoid that research as both the Organizations and BLM agree skiing is not an economic driver on BLM lands in Colorado.

Research appears to indicate skiing does not resolve the basis of our original correspondence either. The Organizations believe that there are numerous activities on BLM lands that provide similar levels of economic contributions, such as hunting, camping and motorized recreation. These are active user groups on the three BLM field offices that have been the subject of planning in the last year. The Organizations believe the spending profiles of these three user groups, which can rely heavily on access to BLM lands, help to balance BLM spending averages in the same manner as skiing may impact USFS lands.

### **Conclusion.**

The Organizations are very concerned that a balance of multiple usage on BLM lands will not be accurately stuck based on the current economic analysis. The Organizations are acutely aware that calculations of economic contributions for recreational users is a complex calculation for any planning activity, but the complexity of the calculation does not mitigate the need for accurate analysis of the activity. While the economic contribution resulting from of an oil or gas well producing a certain number of gallons of material or permitting a certain number of cattle on a section of public lands may provide a quicker calculation of economic contribution, this does not mean recreation is not a significant economic driver for the Colorado economy.

While the Organizations are not able to meaningfully comment on the process used to develop the economic numbers for the three BLM plans, as draft reports have not been compiled at this point, the Organizations have to believe the error is significant and has impacted many other totals that are tied to economic calculations as well. The position is based on the fact that BLM employment and jobs numbers appear to suffer from the same inconsistencies as the visitor spending calculations. The Organizations believe these each of calculations must yield totals that are at least roughly consistent with other research to insure multiple usage of interests is properly balanced. Consistency between BLM calculations and other sources is simply not the case currently and must be resolved to properly balance multiple use.

Please feel free to contact Scott Jones at 518-281-5810 or by mail at 508 Ashford Drive, Longmont, Co 80504 for copies of any documentation that is relied on in these comments or if you should wish to discuss any of the concerns raised in these comments further.

Sincerely,



Scott Jones, Esq.  
OHVCO Co-Chairman  
SAA Vice President

D.E. Riggle  
Director of Operations  
Trails Preservation Alliance



Randall Miller- President  
Colorado Snowmobile Association



John Bonngiovanni  
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