



April 23, 2021

Department of Interior  
Via email only @ [oiea@ios.doi.gov](mailto:oiea@ios.doi.gov)

Re: EO 14008

Executive Order on Tackling the Climate Crisis at Home and Abroad

Dear Sirs:

Please accept this correspondence as the input and vigorous request of the motorized recreational community to participate in any collaborative efforts required under the Executive Order 14008 entitled "Executive Order on Tackling the Climate Crisis at Home and Abroad" issued by President Biden on January 27, 2021. The motorized community is the single largest partner with public lands managers in providing sustainable recreational opportunities on public lands. This is a result of almost 50 years of NEPA analysis subsequent to EO 11644 and 11989 which mandated motorized route sustainability in the early 1970s and the hundreds of millions of dollars that our community provides to federal state and local land managers for sustainable recreational opportunities every year. Often this funding is leveraging resources such as AmeriCorps that are also sought to be expanded in the EO.

While we are in vigorous support of a healthy environment and eco-system and improved access requirements of EO, we are also generally confused by certain provisions of this EO such as the 30x30 provisions found §216(a)(1). As a result of this confusion, we are asking for more information on the

Proposal and to participate in any discussions around implementation of the requirements moving forward. The Organizations are also keenly interested in the goal of improving access to recreation found in §214 of the EO. Given the almost 50 years of NEPA analysis of motorized recreational access on federal public lands, we cannot think of an interest group that would be better suited to provide input on the goals of improving access in the EO. We would like to avoid impacts to recreational opportunities on public lands and we would also like to understand what the process and ensure that the hundreds of millions of dollars in direct funding from our community is used in the most effective and efficient manner it can be. This can only result from alignment of our programs and interests with the efforts under the Proposal.

### **1. Who we are.**

Prior to addressing the specific input of the Organizations on the EO, we believe a brief summary of each Organization is needed. The Off-Road Business Association ("ORBA") is a national not-for-profit trade association of motorized off-road related businesses formed to promote and preserve off-road recreation in an environmentally responsible manner. One Voice is a non-profit national association committed to promoting the rights of motorized enthusiasts and improving advocacy in keeping public and private lands open for responsible recreation through strong leadership, advocacy, and collaboration. One Voice provides a unified voice for motorized recreation through a national platform that represents the diverse off-highway vehicle (OHV) community. The United Snowmobile Alliance ("USA") is dedicated to the preservation and promotion of environmentally responsible organized snowmobiling and the creation of safe and sustainable snowmobiling in the United States. United Four-Wheel Drive Association ("U4WD") is an international organization whose mission is to protect, promote, and provide 4x4 opportunities world-wide. For purposes of this correspondence ORBA, One Voice, U4WD and USA will be referred to as "The Organizations".

### **2. The Organizations vigorously support the goal of improving recreational access on public lands.**

The Organizations vigorously support the goal of §214 in providing improved sustainable access to recreational opportunities on federal lands. For purposes of this section, we are using the term “sustainable” to reflect the broad range of goals and objectives including protecting resources, protecting against climate change impacts and reduction of greenhouse gases. The motorized community has devoted the last 50 years of effort to partnering with federal land managers to provide sustainable opportunities on public lands. As outlined in other portions of these comments, part of this sustainability has resulted from the large amount of funding that the motorized community has voluntarily created.

While these registration programs have been largely successful in providing sustainable opportunities, often planning efforts occurring at the same time have greatly reduced the overall levels of access for all types of recreation on public lands. As a result, in many areas public access to numerous areas is at levels that are 60% of access previously available, which has pushed many existing facilities to or beyond capacities. Over utilization of any resource causes impacts, and often the impacts of the utilization of limited facilities beyond capacities has been highlighted during the COVID outbreak, where visitation increases that might have been projected to take a decade to reach occurred in a year. We believe this impact can be resolved by expanding access in a thoughtful manner that reflects the large number of resources that are now available.

As a result of the history of increasing sustainability and reducing access the Organizations are uniquely situated to address the need for increased access for recreation. We are also uniquely situated to share successes and challenges of our experiences and share these with other interests seeking to improve recreational access in a sustainable manner.

### **3. What do we do for resource protection and sustainability?**

As generally addressed above, the motorized community is the single largest partner in sustainable recreational access with all types of land managers, as a result of our user pay model effort being widely adopted with states. The coverage of this user pay model of sustainability is significant as each of the 22 snowbelt states have a snowmobile registration program that funds

sustainable winter trails on USFS lands. The summer-based trail programs have generally encompassed more western states but this is not exclusive by any means, as numerous mid-western and eastern states have vigorous voluntary registration summer programs as well. An example of some of these programs are as follows:

**California**

\$60 million in annual combined budget  
Total funding in excess of \$530 million dollars

**Colorado**

\$7 million annual combined current budget  
Total funding approaching \$100 million

**Idaho**

\$3 million annual combined budget  
Total funding approaching \$50 million

**Utah**

\$5 million in current combined budget

**Nevada**

\$5 million in annual budget

**New York**

\$ 6-7 million annually predominately winter

**Vermont**

\$ 3-4 million annually predominately winter

This funding goes to a wide range of sustainable trails efforts and programs, such as providing management and maintenance crews on many Field Offices and Ranger Districts and these programs not only provide sustainable trails but also protect other resources as well. Many of these crews already directly fund or partner with AmeriCorps, Youth Corp crews and other resources that are sought to be developed in the EO.

An example of how these programs protect other resources would be the fact that Colorado Parks and Wildlife OHV program funds crews throughout the state. These crews cut more than

20,000 dead trees off of routes last year. This not only provided sustainable recreational opportunities but also ensured that routes were open for firefighters if wildfires broke out. We are aware of the use of hot shot crews to open trails in areas where maintenance has not been provided, and this seems like a horrible underutilization of the hot shot crews expertise. Being able to effectively respond to the outbreak of a wildfire is protecting a huge range of resources from impacts but also is not a benefit that is readily apparent from our programs.

**3. We have often received conflicting information on the 30 by 30 effort generally.**

The Organizations are respectfully requesting to participate in any discussions within DOI on the EO, and more directly the implementation of the 30 by 30 concept reflected in §216(a)(1) as our efforts to engage a wide range of resources to gain this information has not been successful to date. We have actively participated in numerous town hall meetings with Senators, Congressman and state level interests. These meetings have not provided any detailed information and often even generalized concepts and questions are answered in conflicting manners. Our basic questions on foundational issues with the 30x30 effort would include:

- What is the scale of lands that qualify for conservation? Does the 30x30 effort apply to federal lands, federal and state lands or all lands within an area?
- What is the sought-after level of protection for the resources on the qualifying lands? Is a National Park protected? Wild and Scenic River? Federal lands generally?
- If the effort only applies to Federal lands, how is an adjacent Conservation Easement on private lands being addressed?
- What are qualifying lands being protected from?
- How does the 30x30 effort align with multiple use mandates and other congressional designations, such as National Recreation Areas, National Conservation Areas or other Special Management Areas?
- How are general usages already on these lands addressed as each are different in terms of sustainability?
- How are unintended impacts from management actions avoided?

While these are very basic questions around the implementation of the 30x30 effort, we have not gotten any information on these issues in our due diligence. These are critically important questions to our membership and to improving recreational access in a sustainable manner. As a result, we are asking to participate to allow us to understand this effort more completely.

#### **4. Conclusion**

The Organizations would welcome discussions with DOI regarding the management and sustainability of trails on federal public lands and more importantly how to expand access for all forms of recreation in a more efficient and effective manner. Please feel free to contact Don Riggle at 725 Palomar Lane, Colorado Springs, 80906, Cell (719) 338- 4106 or Scott Jones, Esq. at 508 Ashford Drive, Longmont, CO 80504. His phone is (518)281-5810 and his email is scott.jones46@yahoo.com.

Respectfully Submitted,



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TPA & COHVCO Authorized Representative



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