



July 18, 2023

US Forest Service  
Att: Director-Policy Office  
201 14th St SW  
Mailstop 1108  
Washington DC 20250-1124

RE: Climate Sustainability Proposal  
RIN 0596-AD59

Dear Sirs:

Please accept these comments as the **support** of the above Organizations with regard to the Climate Sustainability Proposal RIN 0596-AD59("The Proposal"). The Proposal seeks to expand sustainability on USFS lands through the larger scale management of timber harvesting to address poor forest health and mitigate risks of wildfire to the ecosystem, which the Organizations recognize as a major threat to sustainability of USFS lands generally. The Organizations support the balanced direction of the Proposal, as it seeks to address and protect existing multiple uses while expanding management efforts to improve the sustainability of public lands. We would also ask the USFS to continue on the current direction of management that applies smaller changes over time rather than seeking to make large leaps forward to meet artificially inflated goals or concerns.

It has been our experience that timber and fuels management can occur in the same areas at the same time with other multiple uses with minimal planning and coordination. The Organizations would ask that USFS continues planning and coordination efforts with Partners to ensure that: 1. Recreational opportunities are as fully maintained as possible during timber management; and 2. Local infrastructure that might be created in the ramping up of timber management activities be completely reviewed for recreational value in the area prior to removal of these resources. The motorized community is often uniquely situated to make improvements to infrastructure such as this by adding toilets, signage and hardening of trails or parking lots. Unlike almost every other user group we have the resources to partner on these efforts after timber efforts are completed. While the motorized community has these resources, leveraging or consolidating NEPA efforts significantly reduces the costs of these efforts and lets them be developed far faster in the long run.

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

Prior to addressing the specific input of the Organizations on the Proposal, we believe a brief summary of each Organization is needed. The Colorado Off-Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization representing the OHV community 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. The TPA is an advocacy organization created to be a viable partner to public lands managers, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of motorized trail riding and multiple-use recreation. The TPA acts as an advocate for the sport and takes the necessary action to ensure that the USFS and BLM allocate a fair and equitable percentage of public lands access to diverse multiple-use trail recreational opportunities. Colorado Snowmobile Association ("CSA") was founded in 1970 to unite winter motorized recreationists across the state to enjoy their passion. CSA has also become the voice of organized snowmobiling seeking to advance, promote and preserve the

sport of snowmobiling through work with Federal and state land management agencies and local, state and federal legislators telling the truth about our sport. CORE is a motorized action group dedicated to keeping motorized trails open in Central Colorado and the region. Idaho Recreation Council (“IRC”) is comprised of Idahoans from all parts of the state with a wide spectrum of recreational interests and a love for the future of Idaho and a desire to preserve recreation for future generations. The Idaho State Snowmobile Association (“ISSA”) is an organization dedicated to preserving, protecting, and promoting snowmobiling in the great state of Idaho. Our members may come from every corner of the state, but they all share one thing in common: their love for snowmobiling. Ride with Respect (“RwR”) was founded in 2002 to conserve shared-use trails and their surroundings. RwR has educated visitors and performed over twenty-thousand hours of high-quality trail work on public lands most of which has occurred on BLM lands. Over 750 individuals have contributed money or volunteered time to the organization. The Alaska Snowmachine Alliance (“ASA”) supports snowmachining throughout the State of Alaska and all snowmachine activities including racing and vintage, snowmachine trails, the SnowTRAC program and its funding, snowmachine Search and Rescue and the betterment of snowmachining throughout the State of Alaska. Nevada Off Road Association (NVORA) is a non-profit Corporation created for and by offroad riders. NVORA was formed to specifically fill the void between the government managers and the rest of us who actively recreate in the Silver State. NVORA does this by maintaining a consistent, durable, and respected relationship with all stakeholders while facilitating a cooperative environment amongst our community. Collectively, TPA, NORA, CSA, CORE, IRC, RwR, ISSA, ASA and COHVCO will be referred to as “The Organizations” for purposes of these comments.

The motorized community has provided between \$200-300 million a year for the management of recreational opportunities and resource protection across the country for decades as a result of their voluntarily created OHV/OSV registration programs. OHV/OSV manufacturers provide hundreds of millions of dollars in additional project specific funding for efforts on public lands.<sup>1</sup>

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<sup>1</sup> As an example of these programs: Polaris Trails grants are outlined here: [T.R.A.I.L.S. Grant Program Application | Polaris](#); Yamaha Access Initiative Grants are outlined here, [Yamaha Outdoor Access Initiative \(yamaha-motor.com\)](#); and Ford’s Bronco wild grant program is outlined here [Ford Bronco™ Wild Fund](#)

As an example, the California OHV grant program provided \$85 million in grants last year, and over the life of the program has funded more than \$750 million in direct funding to public land managers.<sup>2</sup> The benefits of the California OHV program are outlined as follows:

- \* Through our USFS partners, over 18,000 miles and 269,000 acres are available for OHV Recreation.
- \* Through our BLM partners, over 18,000 miles and 478,000 of acres are made available for OHV Recreation.

As another example, Colorado's voluntary registration programs put almost \$9m annually in grants back on public lands, and over the life of this program this has now provided more than \$100m in funding for public lands to maintain sustainable high quality recreational opportunities.<sup>3</sup> This Program funds more than 60 maintenance crews throughout the state of Colorado in addition to equipping and often training them to. Most states that USFS owns lands in have similar programs that provide similarly high levels of funding but these programs extend well beyond just federal public lands and many states have OHV/OSV programs but have little to no federal public lands.

These programs are often used in partnership with the USFS in manners that are nontraditional and are directly occurring on the ground. As an example, the Colorado OHV program has contributed more than \$1m over the last several years to repair the impacts of the East Troublesome fire which impacted more than 190k acres largely on BLM's Kremmling FO and Arapahoe/Roosevelt NF. Initial efforts targeted restoring basic access to the area to allow restoration efforts to even start and we anticipate planting a large number of seedlings and monitoring the area to conclude these efforts.<sup>4</sup> This is a type of project that commonly occurs within our OHV/OSV programs and are the type of projects like to see more of in the future as

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<sup>2</sup> [Welcome to the Off-Highway Motor Vehicle Recreation \(OHMVR\) Division's Grant Programs \(ca.gov\)](#)

<sup>3</sup> Colorado summer program is outlined here <https://cpw.state.co.us/Documents/Trails/OHVGrantProgramAwards.pdf> Colorado winter program is outlined here.

<sup>4</sup> A summary of video of these efforts to date is provided here: [OHV Final on Vimeo](#)

in many locations motorized access to public lands is limited in nature and often times is simply overwhelmed with visitors. These are the type of projects where possible planning for sustainability and recreation may overlap.

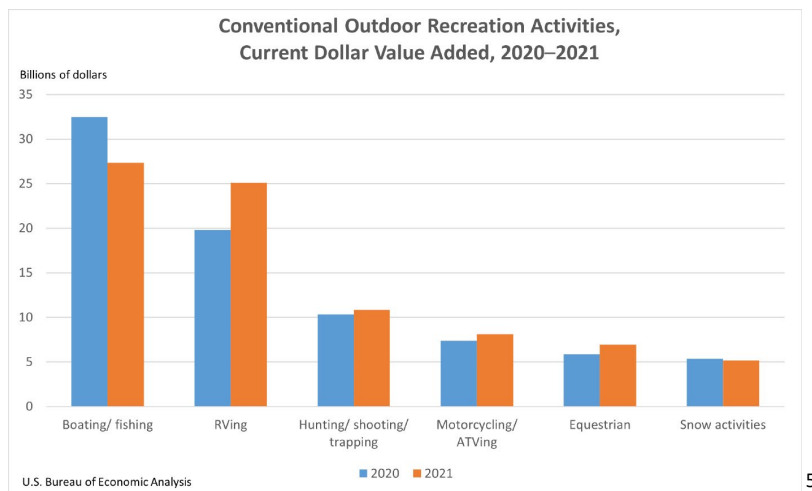
The efforts of the motorized community extend well beyond landscape level efforts and often are targeting much smaller scale areas on an on-going basis. Many of our local volunteer clubs work with land managers have executed “adopt a trail” or “adopt a road” type agreement for large portions of routes in some areas. These clubs often partner with managers on very small acre projects and efforts to address impacts of illegal shooting or dumping in areas with clean up days. These efforts have been highly effective in mitigating impacts of illegal activities while increasing the sustainability of these areas. The end result of all the various types of collaboratives is that our efforts are largely sustainable. This is important as no matter how perfect a trail or trailhead design and construction may be it will need maintenance and oversight and these are efforts we are uniquely situated to partner on.

## **2. The economic contribution of motorized recreation is overwhelming for communities.**

The motorized recreational community is already an important partner with land managers in providing sustainable opportunities under multiple use mandate requirements. These efforts drive the significant economic contributions to local communities that are currently provided from these motorized uses. NEPA analysis has been in place on most multiple uses of federal public lands and these economic engines have been balanced through the development of resource management plans for these lands. Again, the advanced level of analysis in place for motorized usages means that our interests are somewhat uniquely situated to leverage resources from other efforts. We have 50 years of history in balancing resources and recreation that no other user group can claim.

The Organizations are aware that the economic benefits from recreation are often not fully understood or balanced in partner efforts. The Department of Commerce through their Bureau of Economic Analysis (“BEA”) research continues to identify the significant contribution of outdoor recreation to the US economy and the overwhelming portion of outdoor recreation that would be classified as motorized in

nature for USFS management purposes. The research identified that outdoor recreation accounted for 2% of the GDP or more than \$454 Billion in spending annually and that this value was steadily increasing since research started. This research further concluded that motorized spending was the dominant portion of spending for recreational activity, and almost exceeded all other spending sources combined. The BEA research provides the following breakdown of the total recreational spending:



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The Organizations submit that a full understanding of this economic contribution and its components is critical to satisfying the full mandates of various Executive Orders driving the planning effort and existing multiple use mandates. Not only is this information critical to these obligations, this balance is critical to the survival of the smaller communities that are commonly found in and around USFS planning areas that no longer have other revenue streams available to them. While the Proposal seeks to expand the economic contributions and activities from the timber industry, the expansion of the timber activities should not come at the expense of recreational opportunities. Rather we hope that these efforts can be leveraged to expand the benefits to communities from each effort and expand sustainability at the same time.

**3(a). Alignment with the current BLM sustainability proposal must be avoided.**

<sup>5</sup> See, Department of Commerce; *Outdoor Recreation Satellite Account, U.S. and States, 2021 New statistics for 2021; 2017–2020 updated*; Full release and tables pg. 5. A full copy of this report is available here: [orsa1122.pdf \(bea.gov\)](https://www.bea.gov/orsa1122.pdf)

The Organizations cannot overlook the proximity of time between this Proposal and the BLM Sustainability Proposal. After reviewing each Proposal, the Organizations must express some level of surprise at the strikingly different paths forward that each Proposal is taking. As a result of this proximity in time and widely different visions of sustainability from each agency, we have to believe there will be significant pressure to align the two efforts especially during public comment process. Several of the questions the USFS Proposal seeks input on would open the door to discussions such as this. We would ask that if this type of discussion does occur, the USFS Proposal is seen as the model to conform to and not the other way around. The BLM Proposal is fraught with foundational problems and failures and we doubt lacks basic legal authority to even move into implementation. While many interests are asserting that the BLM Proposal is highly visionary in nature, we would assert it is delusional rather than visionary and is generally insulting to partners. The BLM proposal will create huge amounts of conflict before any work could ever be done on the ground and as a result, we have vigorously opposed the BLM effort.

The Organizations must address a foundational flaw in the BLM effort, which is it failed to engage with existing partners before determining the path forward to achieve goals. Some of these failures are absolutely foundational in nature and might have been resolved if BLM had desired to engage with existing partners. The BLM failure to engage resulted in a Proposal that was highly abstract in how it would be implemented and failed to develop a process that avoided unintended impacts and minimized administrative burdens to partners already working in the area. The failures of the BLM to engage with Partners resulted in huge foundational failures in the BLM Proposal, and these warrant a brief discussion in these comments. While our Organizations and users have partnered with BLM managers for decades on projects that could easily generate both conservation and carbon credits, the BLM Proposal seeks to allocate credits based on the concept of a lease. This basic decision simply does not work in the scope of our partnership at all. This basic decision has resulted in numerous conflicts with our partnerships as the concept of a lease does not align well with the multiple use mandate as a lease is generally providing exclusive use of an area. The application of a lease also results in a large amount of

redundant paperwork and administrative burden that will underline any benefit from the action to our interests.

The Organizations are raising this concern, as the large-scale leasing of public lands concept appear to be occurring outside the alignment in time of the two Proposals. Specifically, the concept of a conservation lease appears to be entering the planning discussion with the USFS, as well as the BLM, as we are aware the 2023 version of Americas Outdoor Recreation Act has provisions to provide the statutory authority to create Pay for Performance leases.<sup>6</sup> The possible overlap of the concepts in the legislation and the BLM Proposal cannot be overlooked and we are raising this concern in these comments out of an abundance of caution. Our Organizations and members have a desire to engage with managers to develop and expand resources in a manner that works for all partners and actually creates benefits on public lands. While a lease may appear to be an easy method of development and implementation of this concept, the concept of a lease really fails to align with the multiple use mandate on public lands, existing management applied to partner efforts and would result in large amounts of administrative barriers for current efforts with little additional benefit on the ground.

### **3b. USFS compliance with 30x30 has already been achieved.**

The Organizations and our members are also aware that the 30x30 concept appears to be an issue driving a significant portion of analysis and public comment. The Organizations must express concern over any asserted need of the USFS to comply with the requirements of the 30x30 initiative as part of this planning effort. Based on a cursory review of the current levels of protections and Congressional designations, such as Congressionally designated Wilderness that covers 36 million of 192 million acres of USFS managed lands<sup>7</sup> and Roadless Areas 60 million acres of 192 million acres under USFS management,<sup>8</sup> which results in USFS lands already being approximately 50% protected. Given this situation, any assertions that additional acreage being

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<sup>6</sup> §137 of S873

<sup>7</sup> [By the Numbers | US Forest Service \(usda.gov\)](#)

<sup>8</sup> 2001 Roadless Rule



needed for compliance with 30x30 initiative is misplaced factually. We would be concerned about possible restrictions being put in place under the Proposal in an effort to achieve compliance with a goal that has already been complied with.

**4(a) The Organizations request USFS to continue to meaningfully work with partners and fully utilize existing resources.**

Our first substantive comment on issues that the USFS Proposal has specifically asked for input regarding is that the USFS effort MUST engage partners and avoid unintended impacts to ongoing activities with partners already working on the forests. Our Organizations and user interests are passionate about trails and trail maintenance largely for the recreational benefits that result. We are aware that recreational access is critical to other operations such as search and rescue efforts, and wildlands firefighting. It has been our experience that these indirect benefits of recreational access are often overlooked if public engagement is not undertaken. We are aware of recent firefighting efforts that have flown in hotspot crews from all over the country to then use those crews to clear trails on districts, simply to provide access for safe firefighting. This type of limited access impacting emergency response is an issue our efforts and programs have been able to assist with. The Ranger Districts in question now have maintenance crews funding through OHV grants to help ensure that basic access such as this is provided by the OHV maintenance crews and Hotshot crews are used to engage fire rather than clear trails. Relationships such as this may not grab headlines but they are effective and have many benefits to all interests, but these benefits are only understood with good engagement. Recreational partners should be seen as part of the solution rather than part of the problem and our interests have worked hard to foster these partnerships throughout the country.

We are also urging the USFS to continue to view recreation as a partner in this sustainability effort, which is a significant difference from the direction that BLM has taken. We were disappointed when the BLM proposal identified that recreation was a landscape level threat to public lands. While we are not going to contest there are areas where recreational management

is a challenge and may be impacting resources in the short term, but these areas are isolated and completely insufficient to raise to the level of a landscape or national level threat. The Organizations vigorously support the current USFS 10 Year Sustainable Trails Strategy development, as we believe this is a major step towards the integration of recreation with other management efforts. No single management effort occurs in isolation from other uses on public lands.

The Organizations would request that the implementation of any changes under this Proposal be undertaken on a limited scale before a full rollout of any efforts on a national level. This could be achieved through a Pilot program to ensure that impacts and engagement is accurate and effective. Many USFS offices are horribly short staffed or staffed with USFS employees that may be new to their position, which we are sure will create unique and new problems. Understanding these problems and how to effectively mitigate possible challenges from the staffing challenges must be resolved prior to rollout of any large-scale efforts. While we are aware of several forest and regional level efforts that would appear to be working towards the sustainability the Proposal seeks to achieve, and have done so with minimal impacts to recreational access we cannot confirm this relationship and as a result we are being somewhat cautious in our position. As a result we would like to explore a pilot program or developing greater understanding of efforts that may be in place already.

**4(b) Federal Highways recognition of trails as emergency response and a benefit towards sustainability efforts at the landscape level aligns with the direction of the USFS Proposal.**

The Organizations would also like to draw USFS planners awareness to the recently released publication from Federal Highways Administration outlining the roles that all forms of trails have in the climate situation, emergency response and the often critical role that trails play in addressing sustainability.<sup>9</sup> The alignment of the FHWA report and the direction of the USFS

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<sup>9</sup> See, FHWA; *Trails and Resilience; Review of the Role of Trails in Climate Resilience and Emergency Response*; March 2023.

Proposal cannot be overlooked and the FHWA report identifies many of the indirect benefits of recreational access and effective partnerships that we have discussed in these comments. The Organizations believe documents such as this, coming from agencies and efforts that are unrelated to the Proposal can be highly effective in mitigating public pressure to use the USFS in other directions or to align the USFS manners to the direction of the BLM Sustainability Proposal.

**5(a). Executive Orders requiring an expansion of recreational opportunities issued by President Biden should continue to be accurately addressed in the Proposal.**

Numerous actions over the last decade by Congress and the Executive Branch have been directly targeting landscape level planning requirements and improving multiple use benefits from public lands. The Organizations are pleased to see that these efforts are reasonably reflected in the Proposal. This will allow the Proposal to foster the trust with local communities and acknowledge the history of success that the agency has had with existing management tools. While the Proposal does balance and reflect these efforts accurately, we would ask that these reasonably clear goals and objectives be addressed in any analysis for the Proposal to ensure that resources are leveraged fully now and into the future.

The recent issuance of Executive Order # 14008 by President Biden on January 27, 2021 would be an example of a decision that is accurately summarized and applied in the Proposal. EO 14008 specifically requires the following:

“Executive Order 14008: Tackling the Climate Crisis at Home and Abroad calls for quick action to build resilience against the impacts of climate change, bolster adaptation, and increase resilience across all operations, programs, assets, and mission responsibilities with a focus on the most pressing climate vulnerabilities. Section 211 of Executive Order 14008, calls on Federal agencies to develop a Climate Action Plan.”<sup>10</sup>

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<sup>10</sup> See, Proposal at pg. 19587

EO 14008 specifically addresses the requirement of expanding recreational access and economic benefits five different times, giving this requirement a prominent position in the EO. §214 of EO 14008 clearly mandates improved recreational access to public lands through management as follows:

“It is the policy of my Administration to put a new generation of Americans to work conserving our public lands and waters. The Federal Government must protect America’s natural treasures, increase reforestation, **improve access to recreation**, and increase resilience to wildfires and storms, while creating well-paying union jobs for more Americans, including more opportunities for women and people of color in occupations where they are underrepresented.”

The clear and concise mandate of the EO to improve recreational access to public lands is again repeated in §215 of the EO as follows:

“The initiative shall aim to conserve and restore public lands and waters, bolster community resilience, increase reforestation, increase carbon sequestration in the agricultural sector, protect biodiversity, **improve access to recreation**, and address the changing climate.”

§217 of EO 14008 also clearly requires improvement of economic contributions from recreation on public lands as follows:

“Plugging leaks in oil and gas wells and reclaiming abandoned mine land can create well-paying union jobs in coal, oil, and gas communities while restoring natural assets, **revitalizing recreation economies**, and curbing methane emissions.”

The Organizations are aware significant concern raised around the 30 by 30 concept and climate plans that are memorialized in EO 14008. While the EO does not define what “protected” means, the EO also provided clear and extensive guidance on other values to be balanced with. The fact that large tracts of USFS land are Congressionally designated or managed pursuant to Executive Order or

managed under various USFS Roadless Area designations far exceeds any goals for EO 14008. Any attempt to expand protections to address public concerns on the 30X30 concept would erode the balancing of multiple uses that is required by EO 14008.

Approximately one year after EO 14008 was issued, President Biden issued a second EO again reflecting the need to address climate change and recreation with the issuance of EO14072 on April 22, 2022. EO 14072 is also referenced numerous times in the Proposal and again this EO specifically recognizes and protects recreational usages as part of the effort to develop sustainability and climate resilience. This balance is specifically identified in EO 14072 as follows:

**“Section 1. Policy.** Strengthening America’s forests, which are home to cherished expanses of mature and old-growth forests on Federal lands, is critical to the health, prosperity, and resilience of our communities...We go to these special places to hike, camp, hunt, fish, and engage in recreation that revitalizes our souls and connects us to history and nature. Many local economies thrive because of these outdoor and forest management activities, including in the sustainable forest product sector.”<sup>11</sup>

EO 14072 specifically addresses recreational issues and opportunities as a factor to be addressed in the planning process as follows:

**“Sec. 2. Restoring and Conserving the Nation’s Forests, Including Mature and Old-Growth Forests.** My Administration will manage forests on Federal lands, which include many mature and old-growth forests, to promote their continued health and resilience; retain and enhance carbon storage; conserve biodiversity; mitigate the risk of wildfires; enhance climate resilience; enable subsistence and cultural

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<sup>11</sup> See, EO 14072 at §1

uses; provide outdoor recreational opportunities; and promote sustainable local economic development....”<sup>12</sup>

EO 14072 continues to recognize the need to protect recreational access and related economic benefits as follows:

“(d) The Secretaries, in coordination with the heads of other agencies as appropriate, shall within 1 year of the date of this order: (iii) develop, in coordination with the Secretary of Commerce, with State, local, Tribal, and territorial governments, and with the private sector, nonprofit organizations, labor unions, and the scientific community, recommendations for community-led local and regional economic development opportunities to create and sustain jobs in the sustainable forest product sector, including innovative materials, and in outdoor recreation, while supporting healthy, sustainably managed forests in timber communities.”<sup>13</sup>

The Organizations are supportive of the balanced nature of these EO and the importance of protecting and expanding recreational access that is required in these Executive Orders. The Organizations would be concerned that any major change in direction for the Proposal would disrupt the balance that is provided currently. Effective engagement with partners will continue to carry the balance of these EO and the Proposal more generally into on the ground implementation, and this goal must be a priority moving into implementation.

**5(b) Secretarial Order 1077-044 also reflects a balance of climate concerns and recreational access and economic benefits from recreation to communities.**

The Organizations would also identify that the balancing of multiple uses, more particularly the value of recreational access and its economic benefits, are also recognized in the Secretarial

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<sup>12</sup> See, EO 14072 at §2.

<sup>13</sup> See, EO 14072 at §2(b)(1).

Order 1077-044 issued by Secretary of Agriculture Thomas Vilsack on June 23, 2022. This Secretarial Order recognizes the need to balance and improve recreational access as follows:

“(6) Outdoor Access and Recreation.

Develop recommendations for supporting climate-resilient community well-being, jobs and economic opportunity through equitable access to the outdoors and the outdoor recreation economy. Recommendations should reflect wildfire and climate-related risks to recreation infrastructure and assets and opportunities for integrating recreation outcomes into wildfire risk-reduction and restoration projects, where appropriate.”<sup>14</sup>

The Organizations are supportive of the balanced nature of this Secretarial Order and the importance of protecting and expanding recreational access that is required in this Secretarial Order. The Organizations would be concerned that any major change in direction for the Proposal would disrupt the balance that is provided currently. Effective engagement with partners will continue to carry the balance of this Secretarial Order and the Proposal more generally into on the ground implementation, and this goal must be a priority moving into implementation.

#### **6. Our input on the Climate Risk Viewer.**

The Proposal seeks input regarding a new planning tool called the climate risk viewer, which is outlined as follows:

“c. Specifically for the Forest Service Climate Risk Viewer (described above), what other data layers might be useful, and how should the Forest Service use this tool to inform policy?”<sup>15</sup>

Despite our best efforts, we could not get this tool to display any of the various layers that appear to be present. As a result, our input and review of this planning tool has been limited.

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<sup>14</sup> See, USDA Secretarial Order pg. 6.

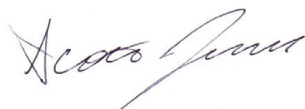
<sup>15</sup> See, Proposal at pg. 24502.

## 7. Our request.

The Organizations support the direction of the Proposal as we are aware that improving forest health on public lands will be a significant step towards achieving the sustainability goals and that this goal can be achieved while improving recreational access. Large scale timber efforts have historically provided basic infrastructure for recreational access after the timber project is completed. The Organizations are also seeking recreational access of any infrastructure that might be developed for the expansion of timber cutting as many times this type of infrastructure can be easily improved for use as a long-term recreational resource. Logging headers are easily transformed into parking areas, roads hardened for log trucks can provide safe sustainable access for decades for recreation and our voluntary registration programs are uniquely situated in the recreational community to partner with managers on these types of projects. These types of projects are also goals that have been identified in numerous Executive Orders and Secretarial orders as goals to be advanced in partnership with expanded sustainability of USFS lands.

The Organizations are expecting significant public input seeking to strengthen the USFS protections for other concerns on public lands, such as preservation of resources. We would be opposed to any change in that type of a direction, as we believe the Proposal strikes a good balance of factors to be addressed. The Organizations are also opposed to any effort to bring the current USFS Proposal into alignment with the direction of the BLM sustainability Proposal, which is currently under development. The Organizations are very concerned that any attempt to align USFS efforts with BLM efforts would magnify the immense failures of the BLM efforts. This must be avoided. If you have questions, please feel free to contact Scott Jones, Esq. (518-281-5810 / [scott.jones46@yahoo.com](mailto:scott.jones46@yahoo.com)), Chad Hixon (719-221-8329 / [chad@coloradotpa.org](mailto:chad@coloradotpa.org)), or Clif Koontz (435-259-8334 / [clif@ridewithrespect.org](mailto:clif@ridewithrespect.org)).

Respectfully Submitted,



Scott Jones, Esq.  
CSA Executive Director



Chad Hixon  
TPA Executive Director



COHVCO Authorized Representative



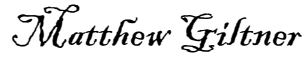
Marcus Trusty  
President – CORE



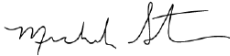
Sandra Mitchell  
Executive Director – IRC  
Authorized Representative – ISSA



Clif Koontz  
Executive Director  
Ride with Respect



Matthew Giltner  
Executive Director  
Nevada Offroad Association



Michele Stevens  
Alaska Snowmachine Alliance