



October 13, 2023

Bureau of Land Management  
1849 C Street NW  
Washington, D.C. 20240

Via email: [mailto:blm\\_hq\\_recreation\\_feedback@blm.gov](mailto:blm_hq_recreation_feedback@blm.gov)

Re: Bureau of Land Management's Blueprint for 21<sup>st</sup> Century Outdoor Recreation

Friends of the Inyo, on behalf of our over 1,000 members, submits these comments in response to the Bureau of Land Management's (BLM) August 2023 Blueprint for 21<sup>st</sup> Century Outdoor Recreation (Blueprint). Friends of the Inyo is a grassroots non-profit organization based in Bishop, California. Our mission is to protect and care for the land and water of the Eastern Sierra. Over our 36-year history, we have actively engaged with land and water management agencies in the Eastern Sierra, including the Bureau of Land Management.

We appreciate the vision and effort that went into drafting the Blueprint. While BLM managed lands offer many recreational opportunities, these lands are also home to deeply valued natural and cultural resources. Recreational uses persistently harm and degrade natural and cultural resources on public lands. It is a common misconception that recreation is generally less harmful to the environment when compared to other human activities on land. This is simply untrue. Every recreational use has some level of direct, indirect, and/or cumulative environmental impact. Off Road Vehicle use in particular tends to have the most significant negative effects on natural and cultural resources and can be highly disruptive to fellow visitors who come in search of tranquility and a connection with nature. We support BLM re-evaluating recreational uses and seeking to better protect natural and cultural resources while improving recreational opportunities for all users. A proactive approach to management is essential to achieve the Pathways outlined in the Blueprint.

## Comments

The four Blueprint Pathways provide many laudable outcomes and strategies for the recreational use of BLM lands. We offer the following comments:

### Elevate Protection of Natural and Cultural Resources

The Pathways are intended to focus on “promoting equitable access to outdoor recreation opportunities while conserving, protecting, and enhancing BLM’s one-of-a-kind resources and experiences.” However, conservation and protection of resources do not appear to have a co-equal emphasis in the outcomes and strategies provided. We request the Blueprint be revised to elevate the conservation and protection of natural and cultural resources to be foremost in recreation planning and management. Specifically, we request the following revisions:

- Pathway 1, Core Strategy A, 2<sup>nd</sup> Bullet  
*Recognize that recreation is not the same everywhere; prioritize the most intensive management actions to meet resource ~~management~~ protection objectives.*
- Pathway 1, Core Strategy B, 1<sup>st</sup> Bullet  
*Evaluate near-term opportunities to leverage Bipartisan Infrastructure Land and Inflation Reduction Act funding, targeting resilience and restoration to support aligned recreation program priorities. This includes deploying Youth, Veterans, and Indian Youth Service Corps teams to accomplish priority resource protection and recreation enhancement projects.*
- Pathway 1, Core Strategy B, 3<sup>rd</sup> Bullet  
*Track federal highways and similar state and federal grant funding opportunities that can support resource protection and recreation projects.*
- Pathway 2, Core Strategy A, 4<sup>th</sup> Bullet  
*Use successful agreement models to advance resource protection and recreation improvements in concert with local governments and nonprofit partners.*
- Pathway 4, Core Strategy A, 1<sup>st</sup> Bullet  
*Prioritize recreation and travel management planning to ensure resource management plans and implementation plans (i.e., recreation area management plans, travel and transportation management plans) protect environmental and cultural resources while providing ~~provide~~ equitable and sustainable recreation opportunities for all visitors.; ~~while protecting environmental and cultural resources~~*

### Reliance on Partnerships

Engaging partnerships to help manage BLM's lands appears to be a cornerstone of the Blueprint. BLM and other land management agencies' budget and staffing limitations are well known and we understand the desire to seek partnerships to spread management responsibilities. Friends of the Inyo is proud to work in collaboration with our local Bureau of Land Management office, and other local land management agencies, to protect natural resources and provide opportunities for engagement and stewardship on public lands. However, partner organizations' such as ourselves and other environmental and/or cultural nonprofits also have a large slate of other programs on and off public lands. Federal budget and staff limitations ultimately affect potential partner organizations ability to engage on public lands and in their communities. While collaborative resource protection and management is always desirable, BLM must commit to protecting and managing the natural and cultural resources that it has been entrusted with.

### Additional Land and Access

While we understand the interest in acquiring additional land and increasing public access, we question doing so given BLM's capacity limitations and need for partnerships to manage their existing lands due to budget and staffing constraints. We naturally also desire the expansion of public lands in public hands, so long as the public management can continue to provide sustainable protection of natural resources for generations to come. Any proposed land acquisition must include consideration of transferring ("landback") the acquired land to Indigenous communities. Finally, we stress the development of long term plans for increasing internal capacity and ensuring existing lands receive adequate protections in order to prevent degradation.

### **Conclusion**

Thank you for the opportunity to comment on the Blueprint for 21<sup>st</sup> Century Outdoor Recreation. We look forward to participating in stakeholder meetings and roundtables to develop action plans that protect natural and cultural resources while providing sustainable and equitable outdoor recreation experiences for today and tomorrow. Please notify us of any stakeholder meetings or other public opportunities so we can continue to engage in the development and implementation of the Blueprint.

Sincerely,

A handwritten signature in black ink that reads "Wendy Schneider". The signature is written in a cursive style with a large, stylized 'W' and 'S'.

Wendy Schneider  
Executive Director