

September 21, 2021

Greg Sheehan, Utah State Director  
Bureau of Land Management  
440 West 200 South, Ste. 500  
Salt Lake City, UT 84101

**Re: Request for the Bureau of Land Management (BLM) to Establish a Non-Motorized Recreation and Visitation Working Group to Review Current Recreation Policies, Identify Current Issues and Management Challenges, and Develop Effective Management Recommendations**

Director Sheehan,

The past decade has seen a rapid expansion of non-motorized recreation on Utah's public lands, and the COVID-19 pandemic has resulted in record numbers of visitors to these unique landscapes. This increased use has resulted in a correlated increase in adverse impacts to wilderness values, visitor experiences, natural and cultural resources, and wildlife. We know that BLM recognizes and is also concerned about these impacts, but is overwhelmed and hindered by decreased funding and limited personnel, particularly for law enforcement, outreach, and education.

Furthermore, we believe that much of the issue stems from BLM's lack of a comprehensive understanding of non-motorized recreation trends and their associated impacts, and the absence of an overarching management strategy for how to address them. Without a holistic, forward-thinking, and proactive strategy, BLM field offices are forced to manage non-motorized recreation reactively--a piecemeal approach that often pushes heavy use into sensitive, less-visited backcountry areas instead of concentrating use and improvements in the more popular and easily accessed frontcountry.

A recently released literature review and report on recreation ecology in the Colorado Plateau, *Outdoor Recreation and Ecological Disturbance, A Review of Research and Implications for Management of the Colorado Plateau Province* (Recreation Report), synthesizes over 60-years of published scientific research to identify the environmental impacts of non-motorized recreation and provides a variety of effective management strategies to accommodate growing recreation demands while maintaining ecological integrity.

The overarching recommendation of the Recreation Report is that land management agencies such as the BLM should focus the growth and expansion of recreation use in frontcountry areas close to communities, while protecting and minimizing development of less-visited, backcountry

areas. This is because the majority of impacts occur as a consequence of initial use and development, while increasing use - even at high levels - in previously disturbed areas results in minimal additional impacts. According to the report, “unused locations are the most precious and fragile, and thus should be intensively protected and managed to avoid the proliferation of impacts.”

The key findings and recommendations of the Recreation Report are particularly relevant to the BLM’s management of public lands in Utah, including:

- “Future management of public lands will have to be proactive in order to accommodate a likely continued increase in demand while also protecting the natural landscapes visitors seek.”
- “Frontcountry and backcountry areas present different management challenges due to the sensitivity of the landscape and visitor expectations. With this in mind, land managers should distinguish between frontcountry and backcountry areas and manage those areas accordingly.”
- “Activity types and behaviors that result in expanding recreation use from concentrated, high-use areas to new, less visited and undisturbed locations are perhaps the most serious consideration.”
- “Concentrating visitor use in previously impacted or hardened sites and trails will likely be a successful management strategy, while dispersal strategies may result in a proliferation of recreation disturbance.”

Unfortunately, the BLM’s current management approach to the increased visitation and non-motorized recreation on Utah’s public lands is largely reactionary and focuses on dispersing use over the landscape. Instead of directing recreationists to existing frontcountry sites, and improving those sites’ amenities and infrastructure, the agency is dispersing use into previously quiet, less-used backcountry settings, resulting in diminished visitor experiences and a proliferation of harmful impacts, including wildlife habitat fragmentation, soil and vegetation loss, and the proliferation of invasive species.

To maintain healthy functioning ecosystems, preserve biodiversity, and mitigate impacts from climate change, scientists say that we need to protect more land, and the benefits increase dramatically when we protect large landscapes that connect ecosystems and wildlife habitat. BLM’s dispersal management strategy is causing increased fragmentation of important, connected landscapes. Accordingly, it is time for the agency to proactively manage visitation and non-motorized recreation in a comprehensive and holistic way that protects existing, undisturbed landscapes while accommodating increased demand and providing meaningful, high-quality recreational experiences.

**Therefore, we are calling on the Utah BLM to establish a non-motorized recreation and visitation working group to conduct a comprehensive review of current recreation management policies, with a focus on identifying growing issues and management challenges.** The working group should develop recommendations for state-level directives to address current problems stemming from non-motorized recreation, and develop recommendations regarding motorized travel management as it influences and relates to non-motorized use patterns. The working group should include representatives from Native American tribes, wilderness and public land conservation organizations, historically underrepresented community organizations, quiet recreation organizations, and scientific and academic experts in the fields of recreation management, biology, wildlife, soils, and cultural resources.

Thank you for taking the time to review the attached Recreation Report and for contemplating our recommendations for actions that the Utah BLM can take to address the increasing recreational impacts on our unique and sensitive public lands. We look forward to working with you on this issue to find responsible, science-based approaches to managing recreation and visitation for sustainability, resource protection, and quality visitor experiences.

Sincerely,



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