



MOTORCYCLE RACING ASSOCIATION OF NEVADA (MRAN)

**DISTRICT 35 Affiliate of the
AMERICAN MOTORCYCLIST ASSOCIATION**

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Nevada non-profit 25079-2004
July 21, 2017

Dear Acting BLM Director Michael Nedd,

We appreciate the opportunity to share our thoughts. The Ely and Southern Nevada DOs work well with us to address issues within their control. It rarely occurs, but when new staff members have re-interpreted established procedures, forwarding the dialogue up the ladder has led to quick resolution. An issue we'd appreciate your addressing is the BLM's website. New isn't always better and change isn't always good. The BLM's old website was an excellent stakeholder tool. The new BLM website is aimed at things to do for the casual visitor. Perhaps there's a need to serve both clienteles. The stakeholder website should have an easy search tool to links to project and searchable manuals, including, but not limited to, the SRP manual.

Moving to general issues, changes have been made at the top, but President Obama's policy is still being implemented down the line. Rescind FINAL DECISION, 43 CFR 1600, Docket ID: BLM-2016-0002; LLWO210000,17X.L16100000.PN0000, RIN: 1004-AE39. November 22, 2016. It replaces the public process of RMP revisions by allowing bureaucrats to write their own RMPs. Please address long overdue and outdated RMP revisions. ACECs should be

created only by RMPs. Administratively created ACECs should be temporary emergency measures only. All ACECs should state critical concerns, rehabilitation measures, and targets for completion of mitigation. Write RMP revisions based on sustainable management versus a concept of remaking public land based on imagination. Every sign of use is not an environmental concern. Write RMPs surrounding growing metropolitan areas as regional master plans taking a wholistic approach with the BLM likely not being at the head of the table. End protecting jurisdictions trumping best management. And last, the BLM is a big ship to turn. Turning it may take a while. On the implementation level, it doesn't appear it's turning.

SOME GENERAL ETHOS CONCERNS

1. RETURN TO PRINCIPLES OF SUSTAINABLE MANAGEMENT: The greatest cause of dysfunctional management of western federal public land is policy of remaking public land based on a perception of what it should be. Disney over Nat-Geo. Most public land should be managed for sustainable multiple use. There's needs for special use areas, particularly around metropolitan areas, i.e., recreation areas. Overall, too much public land is managed for special use that isn't justified by science or for providing ample area to serve public demands for a special use, in particular, Wilderness. The Wilderness Act of 1964 identified and protects places for people who want to experience solitude in primitive settings. The wilderness areas set aside in 1960's and 70's were areas untouched by man and filled the need for those seeking solitude in natural places. The continuing search for more wilderness, new wilderness has been designated by removing people from natural places by prohibiting activities proven sustainable

over time. The continued expansion of wilderness areas has not been justified to as needed to serve the number of people seeking solitude in primitive natural settings. It's taking from the many to serve the (often only the perceived) needs of a few. When public land is closed for the reasons most people go there, visitor numbers drop, creating economic nightmares for rural communities. To best serve all Americans we must make the best use of natural areas for sustainable recreation, traditional ranching, responsible mining and drilling, and keep natural areas natural to maintain Earth's life support system. All that is best served by managing public land for sustainable multiple use as a renewable resource.

2. THE REAL STAKEHOLDERS SHOULD HAVE GREATER SAY: Some people comment on issues they know nothing about and doesn't affect them. The comments against the 2016 Vegas to Reno race is an example. A problem with people who aren't affected by the policies they advocate participating as stakeholders is they are immune from the reality of the harm they do. Consider a remedy of requiring in-person submittal of comments at a government office closest to the management area. There are US Post Offices everywhere. When people visit to comment, rent a room and stay awhile, then comment.

3. APPLY THE **KISS** PRINCIPLE TO SCALE BACK NEPA REQUIREMENTS TO FIT THE PROJECT: An example from community planning most people may be familiar. Planning to build a big project like a shopping center requires area planning and extensive studies and engineering to address infrastructure (traffic patterns, storm runoff thru the area, increased run-off from

structure roofs, paved areas, etc.). Building a house planning can be done with cookbook formulas. Applying NEPA to small projects is unnecessary and prohibitively expensive. NEPA should not apply to existing trails or trail re-routes. A trail only runs thru an area. It doesn't cover over the area. Wildlife isn't annoyed by people riding vehicles. Address potential hazards by objective analysis, not subjective judgement of what should or shouldn't be allowed there.

4. APPLY DICTIONARY DEFINITION TO "SPECIAL" and "UNIQUE": There are places that are truly special and unique that rightly belong to all Americans in every state. Western states have given up a greater share than most states for the common good. There's people from other states that continue asking for us to give up more. Federal or not, what's not special or unique should be managed for the people most affected. It's not America's public land.

Western federal public land wasn't set aside because it was special or unique. Everything west of the Mississippi was federal land. What's remained federal public land wasn't because it's special or unique. It remained federal public land because it wasn't worth owning. For a century, it was open to all, owned by none. The need for management evolved as our nation's population grew ten times over. Federal management was with, by, and for the stakeholders. That worked for most of the last century. Managing the bulk of the West as flyover colonies ruled by coastal urban elites for a nature experiment doesn't work for the people that live here, and it's just plain not right.

A little bit about MRAN. Southern Nevada off-highway motorcycle riders came together in 1968 to form an organization to host and sanction off-highway motorcycle events in

Nevada's Clark, Lincoln, Nye, and White Pine Counties. MRAN has over 700 active competition riders, and over 4000 non-competition members. MRAN is the southern Nevada affiliate of the American Motorcyclist Association. We'll appreciate your consideration of our concerns and we are at your service as public land stakeholders and conservationist.

Thank you and our best regards.

Sincerely,

Robert Adams, Land Use Officer

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