

From: Goode, Ann E -FS
Sent: 21 Jun 2017 18:21:25 +0000
To: Weeks, Andria -FS
Cc: Snieckus, Mary -FS
Subject: FW: Thank you and follow up
Attachments: 2017-06-12 EO 13781 collab letter.pdf, economics letterv2.pdf, WildernessSociety_et al_EO13781_June12.pdf, Outdoor Industry comment on EO 13781.pdf, Outdoor Alliance comment on EO 13781.pdf, NGO_Letter_EO_USDA_May_2017.pdf

FYI, A

From: Vera Smith [mailto:vera_smith@tw.s.org]
Sent: Wednesday, June 21, 2017 1:12 PM
To: Goode, Ann E -FS <aegoode@fs.fed.us>; Velasco, Robert -FS <robertvelasco@fs.fed.us>
Cc: josh_hicks@tw.s.org
Subject: Thank you and follow up

Dear Robert and Annie,

Thank you very much for taking the time to meet two weeks ago, and being so generous with your time. In regard to the Forest Service's implementation of the executive orders, as we discussed, we are looking forward to opportunities to engage in the conversation and review draft products. In that vein, I am attaching a copy of a letter that a number of conservation organizations sent to Chief Tidwell and Acting Deputy Undersecretary Dan Jiron in May asking for transparency and inclusion in the review processes associated with the Executive Orders.

In addition, FYI I wanted to share with you the attached letters that were submitted to the OMB Director by various entities in response to the open comment period (closed June 12) on *Executive Order 13781: Comprehensive Plan for Reorganizing the Executive Branch*. These letters express support for the federal lands agencies, emphasize the benefits they provide the country, and highlight the high return on investment to the taxpayer. As a FYI, we also provided copies of these letters to the Department.

- Letter from 30 economists across the United States, in support of the public lands agencies explaining how Federal public lands and waters are integral to sustaining healthy local economies.
- Letter from about 126 recreation organizations and another letter from about 60 recreation businesses from across the U.S. in support of the public land agencies. The letters emphasize the economic value of our federal public lands from a conservation and recreation standpoint.
- Letter from 51 diverse entities across North Carolina, Virginia, Georgia, Alabama, and Tennessee in support of Forest Service programs that hugely benefit the communities and economies across the Southern Appalachian region. While the people signing the letter represent diverse interests, they all agree that increased funding for the Forest Service and its collaborative/infrastructure/stewardship programs is a good investment for the American taxpayer.
- Letter from national conservation organizations -- The Wilderness Society, Defenders of Wildlife, Western Environmental Law Center, and Sierra Club -- in support of the public land agencies and their conservation and recreation programs.

Please let me know if you have questions. With regards, Vera

P.S. Please note that (b)(6) Josh Hicks
(josh_hicks@twc.org) will be the point of contact in my absence.

Vera Smith

National Forest Planning and Policy Director

The Wilderness Society

303.650.5942

www.wilderness.org

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We protect wilderness and inspire Americans to care for our wild places

Southern Appalachian National Forest Stakeholders

June 12, 2017

Director Mick Mulvaney
Office of Management and Budget
725 17th St. NW
Washington, D.C. 20503
Submitted electronically via regulations.gov

Re: Notice of Request for Comment on Government-wide Reform

Dear Director Mulvaney,

The undersigned stakeholders represent a broad range of interests in public lands in the Southern Appalachians. We are sportsmen, purchasers of forest products, environmental conservation groups, recreation users and businesses, youth camps, tribal leaders, watershed protection groups, and local governments. In response to your request for comments under Executive Order 13781, **we strongly urge you to maintain and strengthen the vital functions and programs of the U.S. Forest Service (USFS)**, which manages several million acres of public lands in our region.

Within easy driving distance from many major population centers, the National Forests of the Southern Appalachians receive millions of visitors each year and provide clean drinking water to millions more downstream, anchoring our local economies, culture, and quality of life. The work of federal land managers--maintaining trails and roads, providing habitat for wildlife, restoring healthy forests and watersheds, stewarding existing wilderness, and planning for the future--is critical to our communities, members, and constituencies.

The Federal Register notice requesting comments on Executive Order 13781 asks the public to weigh in on which agencies and functions should be eliminated, transferred to non-federal entities, or modified, and in particular to comment on those with poor cost/benefit ratios.

As a diverse group of stakeholders, one thing we all heartily agree on is that public lands are among the country's smartest investments, providing incredible value at low cost to taxpayers. The Forest Service receives just a tiny fraction of the federal budget, but the economic benefit of our national forests is enormous. In addition to clean water and other ecosystem services, they support diverse economies from local to national scales, including an outdoor

recreation industry that contributes nearly \$900 billion and 7.6 million jobs to the American economy--\$90 billion and 1 million jobs in our region alone. With consistently high visitor satisfaction scores, we might be so bold as to say that no other federal agency function creates such a strong sense that the public is getting its money's worth.

Not only do federal lands provide great value for the public, but they also do it with increasing efficiency and accountability. As budgets have been stretched by maintenance backlogs and firefighting needs, federal land managers have responded with innovative collaborative approaches to reduce friction, increase partner investment, and produce scaled management projects. These efforts have also created enhanced transparency and trust between the government and the public. Many of us have served as stakeholders in these processes, and we believe improved efficiency comes from working together locally, from the ground up. We have already seen remarkable improvements firsthand, and we hope you will help us build on those successes.

Despite heroic efforts to do more with less, many Forest Service functions are strained to their limits. Further cuts to USFS programs will directly harm the communities and economies that are connected to our forests. We therefore encourage you to support the vital functions that support our communities:

- Protecting clean water;
- Creating local jobs, from timber and forest products to recreation and tourism;
- Managing wildlife habitat and fisheries;
- Managing fire and protecting forest neighbors;
- Maintaining infrastructure and addressing legacy roads and trails;
- Working cooperatively with State and Tribal governments and private landowners;
- Stewarding trails, wilderness, and cultural resources;
- Law enforcement;
- Land and resource planning, assessment, and monitoring; and
- The Collaborative Forest Landscape Restoration Program.

In addition, to the extent that you recommend organizational changes, we suggest that you prioritize the following:

- A fire funding mechanism that halts the erosion of other programs due to increasing suppression costs, provides for emergency funding, and does not require "borrowing" from other discretionary funds.
- Additional staff and resources to support and expand innovative collaborative solutions to reduce conflict and produce the best projects possible, and to assist line officers in transitioning to a culture of collaborative, integrated project development.
- Resources to address deferred maintenance needs in collaboration with stakeholders and state and local authorities in order to meet needs for resource management, water quality, recreation, and traditional and cultural uses.

Thank you for considering these comments. Sincerely,

Southern Appalachian National Forest Stakeholders

Access Fund Zachary Lesch-Huie, Southeast Regional Director National	Alabama Rivers Alliance Cindy Lowry, Executive Director Alabama
American Whitewater Kevin Colburn, National Stewardship Director National	Appalachian Voices Thom Kay, Senior Legislative Representative North Carolina and Virginia
Atlanta Audubon Society Nikki Belmonte, Executive Director Georgia	Audubon North Carolina Curtis Smalling, Director of Conservation North Carolina
Backcountry Horsemen of North Carolina Deirdre Lightsey North Carolina	Carolina Mountain Club Barbara Morgan, President North Carolina
North Carolina Resource Conservation and Development Melissa Patton, Carolina Land and Lakes RC&D North Carolina	Chattahoochee Riverkeeper Juliet Cohen, Executive Director Georgia
Chattooga Conservancy Nicole Hayler, Executive Director Georgia	Cherokee Forest Voices Catherine Murray, Cherokee Forest Voices Tennessee
Defenders of Wildlife Ben Prater, Southeastern Program Director National	Eastern Band of Cherokee Indians Joey Owle, Secretary of Agriculture Sovereign
Environment Georgia Jennette Gayer, Director Georgia	French Broad Riverkeeper Hartwell Carson North Carolina
Friends of Shenandoah Mountain Lynn Cameron, Co-Chair Virginia	Georgia Bartram Trail Society John Ray Georgia
Georgia Conservancy Robert Ramsay, President Georgia	Georgia ForestWatch, Georgia Mary Topa, Ph.D., Executive Director Georgia
Graham County (NC 11th District) Sophia Paulos, Economic Development Director Graham County, North Carolina	Hiwassee River Watershed Coalition, North Carolina Callie Moore, Executive Director North Carolina and Georgia
Mountain High Hikers Richard Sullivan, President Georgia	MountainTrue Julie Mayfield North Carolina
National Parks Conservation Association Jeffrey Hunter, Southeast Region Prog. Mgr. National	North Carolina Sierra Club Judy Mattox, Chair Wenoca Group North Carolina

Southern Appalachian National Forest Stakeholders

North Carolina Trout Unlimited
John Rich
North Carolina

North Carolina High Peaks Trail Association
Jake Blood, Board Member
North Carolina

North Carolina Wildlife Federation
Tim Gestwicki
North Carolina

North Carolina Youth Camp Association
Maggie Howe
North Carolina

Partners of Joyce Kilmer-Slickrock Wilderness
Richard Evans, President
North Carolina

Potomac Riverkeeper
Dean Naujoks
Virginia and Washington DC

Potomac Riverkeeper Network
Jeff Kelble, President
Virginia and Washington DC

Root Cause Local Forest Products
Lang Hornthal
North Carolina

Shenandoah Riverkeeper
Mark Frondorf
Virginia

Shenandoah Valley Network
Kate Wofford, Executive Director
Virginia

Southern Appalachian Mineral Society
Ken Casebeer
North Carolina

Southern Appalachian Mountain Stewards
Annie Jane Cotten
Virginia

Southern Appalachian Wilderness Stewards
Bill Hodge, Executive Director
Southeast

Southern Environmental Law Center
Sam Evans, Nat'l Parks & Forests Prog. Leader
Southeast

Southern Off Road Bicycle Association
Tom Sauret, Executive Director
Southeast

SouthWings
Hume Davenport, Executive Director
Southeast

Tennessee Citizens for Wilderness Planning
Sandra Goss, Executive Director
Tennessee

The Clinch Coalition
Diana Withen, President
Virginia

The Orienne Society
Chris Jenkins, Ph.D., CEO
Georgia

The Wilderness Society
Jill Gottesman, S. Appalachian Cons. Specialist
National

Upper Potomac Riverkeeper
Brent Walls
Virginia and Washington DC

Virginia Wilderness Committee, Virginia
Mark Miller, Executive Director
Virginia

Watauga Riverkeeper
Andy Hill
North Carolina

Watauga Watershed Alliance, Tennessee
Gloria Griffith
Tennessee

Wild South
Kevin Massey, Executive Director
Southeast

Southern Appalachian National Forest Stakeholders

cc: The Honorable Sonny Perdue
Secretary of the U.S. Department of Agriculture

Enclosure: Southern Appalachian National Forest Facts

Submitted electronically via regulations.gov

June 12, 2017

Mr. Mick Mulvaney, Director
Office of Management and Budget
725 17th St., NW
Washington, DC 20503

Re: Notice of Request for Comment on Government-wide Reform

Dear Director Mulvaney:

We are economists working in academic, management, research and other capacities that have enabled us to view first-hand the important role that federal land management agencies play in supporting vibrant local economies and generating jobs. **We write to you today to express our strong support for continued and robust investment in the land management agencies -- the U.S. Forest Service, U.S. Fish and Wildlife Service, National Park Service, and the Bureau of Land Management – and their conservation programs.** Together, these agencies administer on behalf of the American people 674 million acres of lands that see over half a billion visits annually.¹

On March 13th 2017, the President signed [Executive Order 13781](#) directing you to develop a plan for reorganizing the executive branch including recommending agencies, programs, and functions for elimination. Subsequently, you launched [a 28-day comment period](#) asking the American public to weigh in on how to reorganize, reduce, and eliminate agencies.² While we disagree with the premise that drastic changes to our federal land management agencies are necessary, to the extent that you intend to reorganize and possibly eliminate agencies, we respectfully request that you consider the economic importance of the federal land management agencies and their conservation programs.

The federal land management agencies yield an impressive return on investment. Their funding accounts for less than 0.4% of the nation's annual budget³, yet provides the American people with innumerable benefits worth billions of dollars. They fuel a robust economic engine including a growing outdoor recreation economy valued at \$887 billion annually and tied to 7.6 million jobs.⁴ They also provide this nation with clean water and air, trails and campgrounds, fishing and hunting, and unmatched outdoor experiences. While these services are not bought and sold in stores, they are worth a lot. Consider that the National Wildlife Refuge System alone provides ecosystem service valued

¹ See US Forest Service, 2012. National Visitor Use Monitoring Report. Available at: https://www.fs.fed.us/recreation/programs/nvum/2012%20National_Summary_Report_061413.pdf. Page 24; National Park Service. Annual Visitation Highlights. Available at: <https://www.nps.gov/subjects/socialscience/annual-visitation-highlights.htm>; Department of the Interior, Bureau of Land Management. 2015. Public Lands Statistics. Page 186; U.S. Fish & Wildlife Service, 2015. Annual Performance Report FY2015: National Wildlife Refuge System. Page 3.

² 82 Fed. Reg. 22355 (March 15, 2017)

³ Office of Management and Budget Historical Tables for Sub-Function 302. Available at: <https://obamawhitehouse.archives.gov/omb/budget/Historicals>

⁴ Outdoor Industry Association, 2017. The Outdoor Recreation Economy. Available at: <https://outdoorindustry.org/resource/2017-outdoor-recreation-economy-report/>

at \$32.3 billion to nearby rural communities⁵, and national forests, the single largest source of municipal water supply, services over 66 million people in 3,400 communities. The value of this water is over \$7.2 billion annually.⁶

Further, federal public lands are integral to sustaining healthy local economies. In today's economy many businesses are free to choose the location for their entrepreneurial endeavors. Federal public lands – and especially protected lands -- are important for attracting and retaining talented workers, entrepreneurs and investors. Rural counties with higher levels of protected public lands have higher incomes, higher employment levels and greater population growth than rural counties that lack such lands.⁷ Federal land management agencies provide jobs many of which are located in rural communities. These jobs in turn create spillover employment—for example, research shows that every job in the U.S. Forest Service is linked to significant additional employment.⁸

We recognize that the American public wants our federal agencies to be efficient and provide high value benefits to the American people. We do too. The federal land management agencies, through their conservation programs that protect our air, water and wildlife, produce an outsized rate of return. From an economic perspective, it only makes sense to continue and increase the investment in these agencies and their conservation programs.

Thank you for considering these comments.

Sincerely,

The following individuals have endorsed the contents of this letter. Institutional references are provided for identification only.

Spencer Phillips, Ph.D., Economist, Key-Log Economics, Virginia

Michelle Haefele, Research Scientist, Department of Agricultural & Resource Economics, Colorado State University, Colorado

Kimberly Clausing, Professor of Economics, Reed College, Oregon

Austin Troy, Professor and Chair, University of Colorado Denver, Department of Urban and Regional Planning, Colorado

Thomas B. Petska, Director, Statistics of Income Division, IRS (retired), Maryland

⁵ Southwick Associates, 2011. The Economics Associated with Outdoor Recreation, Natural Resources Conservation and Historic Preservation in the United States For: The National Fish and Wildlife Foundation. Available at:

<https://www.fws.gov/refuges/news/pdfs/TheEconomicValueofOutdoorRecreation%5B1%5D.pdf>

⁵ Outdoor Industry Association, 2017. The Outdoor Recreation Economy. Page 11. Available at: <https://outdoorindustry.org/resource/2017-outdoor-recreation-economy-report/>

⁶ USDA Forest Service. Information on Water Resources. Available at:

https://www.fs.usda.gov/wps/portal/fsinternet/cs/detail/lut/p/z0/04_Sj9CPykssv0xPLMnMz0vMAfjo8zjiQwggwNHCwN_Di8zPyBcqYKBfkO2oCA_BZcx5g/?position=Contribution%20Content.Html&pname=Forest%20Service&ss=119995&navtype=SubNavigation&pnavid=11014010000000&navid=11014010000000&ttype=detail&cid=stelprdb5107778

⁷ Headwaters Economics, 2017. Federal Public Lands in the West: Liability or Asset. Available at: <https://headwaterseconomics.org/public-lands/federal-lands-performance/>

⁸ US Forest Service, 2012. Final Environmental Impact Statement for the Land Management Planning Rule, Appendix M. Available at https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5349160.pdf

Richard B. Norgaard, Professor Emeritus of Energy and Resources, University of California, Berkeley, California

David Gallo, Professor Emeritus, Department of Economics, California State University, Chico, California

Thomas Michael Power, Professor Emeritus, Economics, University of Montana, Montana

Neva Goodwin, Global Development and Environment Institute, Tufts University, Massachusetts

Dr. Robert J. Lillieholm, E.L. Giddings Professor of Forest Policy, University of Maine (Retired), Texas

Dr. Maggie Winslow, Associate Professor, University of San Francisco, California

Rob Southwick, Economist, Southwick Associates, Inc., Florida

Dr. Michael R. Moore, Professor of Environmental Economics, University of Michigan, Michigan

Christopher A. Erickson, Professor of Economics, New Mexico State University, New Mexico

Eban Goodstein, Director, MBA Program at Bard College, New York

Darwin C. Hall, Professor Emeritus of Economics, California State University, Long Beach, California

Nicholas E. Flores, Professor of Economics, University of Colorado, Boulder, Colorado

Dr. John A. Sorrentino, Associate Professor of Economics, Temple University, Pennsylvania

Karen Conway, University of New Hampshire, Professor of Economics, Massachusetts

Julie A. Nelson, Professor of Economics, University of Massachusetts, Boston, Massachusetts

Frederic B. Jennings Jr., Ph.D., President, Center for Ecological Economic and Ethical Education (CEEEE), Massachusetts

Carolyn Alkire, Ph.D., Economist, Key-Log Economics, California

Madhavi Venkatesan, Bridgewater State University, Massachusetts

Angela Fletcher, Project Director, Earth Economics, Washington

Paul Angermeier, Professor, Virginia Tech, Virginia

Robert R. Alexander, Professor of Economics and Environmental Studies, Kenyon College, Ohio

Robert L. Chapman, Professor of Philosophy & Environmental Studies, Pace University, New York

Michael Carbajales-Dale, Assistant Professor, Clemson University, South Carolina

Robert Gottfried, Professor Emeritus of Economics, The University of the South, Sewanee, Tennessee

Evan Hjerpe, Director, Conservation Economics Institute, Idaho

June 12, 2017

Mr. Mick Mulvaney, Director
Office of Management and Budget
725 17th St., NW
Washington, DC 20503

Re: Notice of Request for Comment on Government-wide Reform

Dear Director Mulvaney:

As representatives of the undersigned conservation organizations, we write to you today to express our strong support for continued and robust investment in the land management agencies¹ -- the U.S. Forest Service, U.S. Fish and Wildlife Service, National Park Service, and the Bureau of Land Management (BLM) – and their conservation programs. Together, these agencies administer on behalf of the American people more than one billion acres of public lands and waters that attract over half a billion visitors annually.² The undersigned organizations represent millions of Americans who deeply care about our public forests, grasslands, deserts and waters. Our members and supporters value these priceless public assets for the water and clean air they provide to communities, the outdoor recreation they offer, the wildlife they harbor, and the resources they contain.

On March 13 2017, the President signed [Executive Order 13781](#) directing you, as Director of the Office of Management and Budget (OMB), to develop a plan for reorganizing the executive branch, including recommending agencies, programs, and functions for elimination. Subsequently, you launched [a 28-day comment period](#) asking the American public to weigh in on how to reorganize, reduce, and eliminate federal agencies.³ While we disagree with the premise that drastic changes to our federal resource management agencies are necessary, to the extent that you intend to reorganize and possibly eliminate agencies, we respectfully request that you consider the economic importance of these agencies and their conservation programs – and not only retain them, but also ensure they are sufficiently funded.

¹ While we use the term “land management agencies” we note that it reflects more broadly public lands and waters, including marine refuges.

² See US Forest Service, 2012. National Visitor Use Monitoring Report. Available at: https://www.fs.fed.us/recreation/programs/nvum/2012%20National_Summary_Report_061413.pdf. Page 24; National Park Service. Annual Visitation Highlights. Available at: <https://www.nps.gov/subjects/socialscience/annual-visitation-highlights.htm>; Department of the Interior, Bureau of Land Management. 2015. Public Lands Statistics. Page 186; U.S. Fish & Wildlife Service, 2015. Annual Performance Report FY2015: National Wildlife Refuge System. Page 1.

³ 82 Fed. Reg. 22355 (March 15, 2017).

Federal Land Conservation is a Smart Investment

Our federal public land agencies administer on behalf of the American people more than one billion acres of land and water from Alaska to Florida and Maine to the South Pacific. The Bureau of Land Management, the National Park Service, the U.S. Forest Service and the U.S. Fish and Wildlife Service derive their management direction from their individual organic acts and other relevant guiding statutes that impose specific, congressionally mandated, constraints and duties. Specific to conservation, these include, among others, the Wilderness Act, the Wild and Scenic Rivers Act, the National Landscape Conservation System Act, the National Forest Management Act, the Federal Land Management and Policy Act, the National Wildlife Refuge System Improvement Act, the Endangered Species Act, the Clean Water Act, the Clean Air Act, the Multiple Use and Sustained Yield Act, the National Trails System Act, and the National Environmental Policy Act.

Conservation of our public lands and waters is among the country's smartest investments, providing incredible value at low cost to taxpayers. The combined budget of the federal natural resource management agencies accounts for less than 0.4% of the nation's annual budget,⁴ yet provides the American people with benefits worth billions of dollars. Our federal lands and waters supply this nation with clean water and air, trails and campgrounds, fishing and hunting, life-saving habitat for thousands of imperiled species, and unparalleled outdoor experiences. While these services are not bought and sold in stores, they generate immense economic returns. Consider that national forests, the single largest source of municipal water supply, services more than 66 million people in 3,400 communities. The value of this water exceeds \$7.2 billion annually.⁵ The National Wildlife Refuge System alone provides ecosystem services valued at \$32.3 billion to nearby rural communities.⁶ In direct economic terms, our nation's lands and waters are the infrastructure for an [outdoor recreation industry](#) that contributes nearly \$900 billion and 7.6 million jobs to the American economy.⁷

Further, federal public lands and waters are integral to sustaining healthy local economies. In today's economy many businesses are free to choose the location for their entrepreneurial endeavors. Federal public lands – and especially protected areas -- are important for attracting

⁴ Office of Management and Budget Historical Tables for Sub-Function 302. Available at: <https://obamawhitehouse.archives.gov/omb/budget/Historicals>.

⁵ USDA Forest Service. Information on Water Resources. Available at: https://www.fs.usda.gov/wps/portal/fsinternet/cs/detail/lut/p/z0/04_Sj9CPyKssy0xPLMnMz0vMAfjo8zjQwggwNHCwN_DI8zPyBcqYKBfkO2oCA_BZcx5g/?position=Contribution%20Content.Html&pname=Forest%20Service&ss=119995&navtype=SubNavigation&pnavid=110140100000000&navid=110140100000000&ttype=detail&cid=stelprdb5107778.

⁶ Southwick Associates, 2011. The Economics Associated with Outdoor Recreation, Natural Resources Conservation and Historic Preservation in the United States For: The National Fish and Wildlife Foundation. Available at: <https://www.fws.gov/refuges/news/pdfs/TheEconomicValueofOutdoorRecreation%5B1%5D.pdf>.

⁷ Outdoor Industry Association, 2017. The Outdoor Recreation Economy. Page 11. Available at: <https://outdoorindustry.org/resource/2017-outdoor-recreation-economy-report/>.

⁷ Outdoor Industry Association, 2017. The Outdoor Recreation Economy. Available at: <https://outdoorindustry.org/resource/2017-outdoor-recreation-economy-report/>.

and retaining talented workers, entrepreneurs and investors. Rural counties with greater proportions of protected public lands have higher incomes, higher employment levels and greater population growth than rural counties without such lands.⁸

Chronic Underfunding is Undermining Effectiveness of Natural Resource Agencies

Over the last few decades, our public lands agencies have suffered a decline in real budgets for critical programs and dwindling workforces. This has led to many difficult decisions: reduced visitor services and recreational investments, reduced scientific research and monitoring, compromised conservation and management, growing maintenance backlogs, and other impacts. For instance, between 1995 and 2015, the funding for the National Forest System has been reduced by 32% in real dollars, and the agency's staffing dropped by almost 40% between 1998 and 2015.⁹ This is in part due to the growing cost of wildfire suppression, which now consumes more than 50% of the agency's budget.¹⁰

Recent employee surveys reflect the impacts of chronic underfunding and staffing. A [recent survey](#) by Public Employees for Environmental Responsibility (PEER), a national organization representing federal, state and local government professionals, found that 67 percent of BLM employees believe the agency does not have enough resources to accomplish its mission.¹¹ The survey asked how the administration could best improve the BLM. Responses included:

- *"No hiring freeze"*
- *"NOT implementing a hiring freeze – that would be a disaster"*
- *"Do not further cut our funding. I have 1.8 million acres of land in my field office to manage and I am the only natural resources staff member"*
- *"Some people are doing 2-3 jobs just to get the job done."*
- *"Funding to fill vacant positions – more than 20 in our office."*

A similar [survey](#) of national wildlife refuge managers revealed that 94 percent of respondents were concerned that staffing at their refuge was inadequate to meet their core mission:

- *"Addressing the chronic funding shortages that prevent us from adequately staffing our refuges."*
- *"Providing resources to address our maintenance backlog and better serve the members of the public"*
- *"Not do an across-the-board federal govt. cut which would devastate our tiny agency"*

⁸ Headwaters Economics, 2017. Federal Public Lands in the West: Liability or Asset. Available at: <https://headwaterseconomics.org/public-lands/federal-lands-performance/>.

⁹ USDA Forest Service, 2015. The Rising Cost of Fire Operations: Effects on the Forest Service's Non-Fire Work. August 4, 2015. Available at: <https://www.fs.fed.us/sites/default/files/2015-Fire-Budget-Report.pdf>.

¹⁰ *Id.*

¹¹ <https://www.peer.org/news/news-releases/trump-hiring-freeze-hamstrings-his-own-agenda.html>.

- *“Increasing funding for the NWR system so we can hire employees to accomplish our mission”*
- *“The loss of staff has impacted all aspects of the National Wildlife Refuge System. The system no longer shines like it did 20-30 years ago”*

Specific Functions Deserving Enhanced Support and Prioritization

Given the clear importance of conservation and recreation on public lands and waters to our socio-economic well-being, we urge you not to cut – and instead bolster investment in – the following programmatic functions.

Recreation and Wilderness. Federal outdoor recreation and wilderness programs enable Americans to get outside and enjoy their national forests, wildlife refuges and other public lands through a wide variety of activities. They promote public health, enhance community well-being, unite families and friends, and foster citizenship of our nation’s natural resources. Investments promote access for hunters and anglers to world class fish and game habitat, and support local economies by attracting entrepreneurs and amenity-based businesses such as outfitters and gear shops. Specific programs that should be prioritized include:

- The Forest Service **Recreation, Wilderness, and Heritage program** whose funding has shrunk by 15% since 2001, even though recreation participation continues to steadily increase and is projected to increase by 30% for most activities by 2030.¹²
- The Forest Service **Capital Improvement and Maintenance program**, which supports maintenance of ~21,600 recreation sites, ~371,000 miles of roads, and ~157,000 miles of trails, and is essential to address serious public health and safety concerns, maintain public access to rural communities, and protect clean drinking water for 66 million Americans. Since 2001, funding for roads, deferred maintenance, and facilities shrank by 46%, 95%, and 68%, respectively; funding for the **Legacy Roads and Trails program** has been halved since 2010. Such severe reductions force the agency to close recreational facilities and access roads.
- The BLM **National Landscape Conservation System** that comprises over 30 million acres of some of the most scenic and expansive landscapes in our country, including national conservation areas, wilderness areas and other designations that attract visitors and help sustain healthy local economies.
- The BLM **Recreation Resources Management program** that enhances recreation access for all visitors to BLM lands, engages youth, promotes public health, protects visitor safety and strengthens rural economies.
- The Fish and Wildlife Service **National Wildlife Refuge System** that comprises 566 national wildlife refuges with at least one in every state and territory, includes over 20

¹² USDA Forest Service. 2016. Federal Outdoor Recreation Trends: Effects of Economic Activities. PNW-GTR-945. Available at: <http://www.coloradotpa.org/wp-content/uploads/2017/02/USFS-Econ-Impacts-Rec.pdf>.

million acres of wilderness, and prioritizes wildlife-dependent recreation for all Americans to enjoy. Wildlife viewing, photography, hunting, fishing, environmental education and interpretation are hallmarks of the Refuge System, deemed priority public uses when compatible with wildlife conservation.

- The Fish and Wildlife Service **Urban Wildlife Conservation Program**, a visionary partnership that helps urban constituencies discover, appreciate and care for wildlife and nature in their communities.

Land planning and restoration. Resource management planning is the foundation of an agency's stewardship responsibilities. Statutorily required, planning is necessary to ensure our public lands and waters continue providing the American people an array of benefits, including wildfire management, wildlife and fish habitat, outdoor recreation, clean water, and jobs. Management planning lays the groundwork for ecological restoration that improves the health of our lands and waters while injecting funds and jobs into local communities. Reduced investment impairs stakeholder engagement and collaborative decision-making that can support enduring and science-based management. Specific programs that should be prioritized include:

- The Forest Service **Land Management Planning, Assessment, and Monitoring programs** that are crucial for better wildfire management and restoration has shrunk by 44% since 2001. Land management planning is conducted in close collaboration with a national federal advisory committee comprised of diverse stakeholders charged with advancing sound implementation of the 2012 planning rule.
- The Forest Service **Wildlife and Fisheries Habitat Management** program that conserves, restores and enhances habitat for fish, wildlife, and rare plants. It is vital to the 3,500 imperiled and at-risk species that depend on national forest lands for their survival, and supports recreational fishing, hunting and wildlife viewing on national forest lands.
- The Forest Service **Collaborative Forest Landscape Restoration Program** that incentivizes long-term collaborative forest restoration.
- The National Greater **Sage-Grouse Planning Strategy** that is predicated on the concept of "saving" a species before it requires federal protection. Continued implementation of this strategy is important for the recovery of this critical western game species and those who rely on its habitat for their livelihood.
- **BLM Master Leasing Plans**, in which BLM evaluates potential conflicts and impacts on lands prior to leasing, leading to less conflict, better resource management, and more certainty. Increasing leasing and permitting without supporting environmental review and planning, including master leasing plans, will lead to more conflict, protests and litigation, and ultimately diminish the long-term sustainable flow of benefits into local communities and regions.

Renewable energy. Support and funding should continue for BLM's smart renewable energy program that supports development of sustainable, clean energy sources that make sense for

all Americans, and reduces our nation's carbon footprint. The program helps projects succeed in low-conflict areas, reducing impacts and cutting permitting times in half.¹³ Renewable energy continues to increase its market share in the energy arena as technology improves and costs continue to plummet, and drive strong job growth. A 2017 report by the Department of Energy found that solar energy supports 373,807 jobs, more than the jobs in the provision of natural gas (362,118) and over twice as many jobs in coal mining (160,119).¹⁴ Wind energy is also seeing strong job creation, supporting 101,738 jobs. Continued strong funding for the BLM Renewable Energy Program and other related programs within DOI agencies will support these economic and clean energy opportunities in a smart and responsible way.

Transparency and Public Engagement is Integral to Long-Term Success

Federal lands and waters are owned by all Americans. The federal land management agencies administer them on our behalf following the direction prescribed in the guiding statutes and through numerous programs developed over many years, often with extensive stakeholder involvement. While there is benefit in legitimate processes designed to improve program delivery, such exploration and subsequent administrative shifts will only succeed if the public is engaged and the process is transparent. To that end, we respectfully request that you share draft reorganization plans with the public in a way that allows for meaningful review and comment, and that you publicize the decision-making criteria and evaluative process. In particular, for each agency, it would be very helpful to better understand:

- The criteria to be used by OMB to make decisions related to the reform or elimination of agencies and their functions;
- How public comments will be incorporated into the decision-making process;
- How non-market benefits and public value will be accounted for in cost-benefit analyses;
- When OMB will share a draft report with the public for meaningful comment and feedback; and
- How OMB will ensure that administrative shifts (e.g., elimination of programs, reductions in workforce) will not impair the ability of agencies to meet their statutory and regulatory responsibilities.

¹³ See <https://www.doi.gov/pressreleases/interior-department-approves-first-solar-energy-zone-projects>

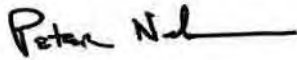
¹⁴ See https://energy.gov/sites/prod/files/2017/01/f34/2017%20US%20Energy%20and%20Jobs%20Report_0.pdf.

Thank you for considering these comments.

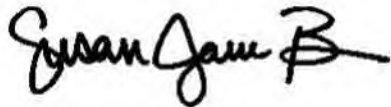
With regards,



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Senior Counsel and Senior Director, Agency Planning and Policy Department
The Wilderness Society
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athan.manuel@sierraclub.org

Cc: The Honorable Ryan Zinke, Secretary of the Department of the Interior
The Honorable Sonny Perdue, Secretary of the US Department of Agriculture

June 12, 2017

Mr. Mick Mulvaney, Director
Office of Management and Budget
725 17th St., NW
Washington, DC 20503

Dear Director Mulvaney:

The undersigned companies and organizations represent members of the outdoor industry whose businesses depend on outdoor recreation that takes place on America's public lands. Our customers hike, camp, mountain bike, ski, climb, and paddle in the great outdoors and their participation in these activities depends on having access to federal public lands and waters.

On March 13th 2017, the President signed [Executive Order 13781](#) directing you to develop a plan for reorganizing the executive branch including recommending agencies, programs, and functions for elimination. Subsequently, you launched [a 28-day comment period](#) asking the American public to weigh in on how to reorganize, reduce, and eliminate agencies.

We write to you today to express our strong support for continued and robust investment in the conservation and recreation programs of the land management agencies: the U.S. Forest Service, U.S. Fish and Wildlife Service, National Park Service, and the Bureau of Land Management. Together, these agencies administer on behalf of the American people 674 million acres of lands that see over half a billion visits annually.¹ They are the stewards of our national parks, forests, wildlife refuges, monuments, and rivers, including remarkable places such as the Grand Canyon, the Wind River mountains, Yosemite, the Appalachian Trail, and the Everglades.

For a modest investment (less than 0.4% of the federal budget), our federal land management agencies generate innumerable benefits worth billions of dollars. These agencies build and maintain trails, campgrounds, and other recreation infrastructure and manage federal lands to provide unbeatable outdoor recreation experiences. Due to the stewardship of our federal land agencies, federal public lands fuel a robust [outdoor recreation economy valued at \\$887 billion annually](#), which supports 7.6 million jobs.²

Funding these agencies has an outsized impact and is a great investment for the American people. Recreational visits to parks, forests, refuges, and other public lands generate \$33 billion in direct spending and nearly 600,000 jobs, and contribute \$37 billion to GDP annually.³ Without increased support for federal land management agencies, however, recreation infrastructure will fall into disrepair and access

¹ See US Forest Service, 2012. National Visitor Use Monitoring Report. Available at: https://www.fs.fed.us/recreation/programs/nvum/2012%20National_Summary_Report_061413.pdf. Page 24; National Park Service. Annual Visitation Highlights. Available at: <https://www.nps.gov/subjects/socialscience/annual-visitation-highlights.htm>; Department of the Interior, Bureau of Land Management. 2015. Public Lands Statistics. Page 186; U.S. Fish & Wildlife Service, 2015. Annual Performance Report FY2015, National Wildlife Refuge System. Page 12. Available at: F

² Outdoor Industry Association, 2017. The Outdoor Recreation Economy. Available at: <https://outdoorindustry.org/resource/2017-outdoor-recreation-economy-report/>

³ U.S. Department of the Interior Economic Report, FY 2015. Prepared by the Department of the Interior Office of Policy Analysis, June 17, 2016. Available at: https://www.doi.gov/sites/doi.gov/files/uploads/fy2015_doi_econ_report_2016-06-20.pdf. Table 2-2. See also US Forest Service, 2012. National Visitor Use Monitoring Report. Available at: https://www.fs.fed.us/recreation/programs/nvum/2012%20National_Summary_Report_061413.pdf. Page 24.

to public lands will be curtailed, diminishing the return on investment in the long run and handicapping our industry. We have already seen this come to pass in many areas across the country as a result of chronic underfunding.

Outdoor recreationists understand the link between healthy lands and healthy lifestyles. **We therefore urge you not to cut – and in fact invest more – in the conservation and recreation programs administered by the US Forest Service, Bureau of Land Management, US Fish and Wildlife Service, and the National Park Service. Likewise, we fully support the Environmental Protection Agency, as it ensures our public lands continue to provide clean air, clean water, and a healthy environment.** While we disagree with the premise that drastic changes to our federal land management agencies are necessary, to the extent that you intend to reorganize and possibly eliminate agencies, we respectfully request that you consider the importance of the federal land management agencies and their conservation and recreation programs. These include, but certainly are not limited to, the 1) Forest Service’s Recreation, Wilderness, and Heritage; Legacy Roads and Trails; Trails; Land Management Planning, Assessment, and Monitoring; and Fisheries and Wildlife Habitat Management Programs; 2) the BLM’s Recreation Resources Management, National Landscape Conservation System; 3) The Operation of the National Park System, National Recreation and Preservation, and many other accounts within the National Park Service budget; and 4) Cross-cutting programs like the Land and Water Conservation Fund.

Thank you for considering these comments.

Sincerely,

Alaska

Heather Szundy
Owner/CFO
Ascending Path
Girdwood & Anchorage, AK

Tim Bourcy
President
Packer Expeditions LTD
Skagway, AK

California

Brendan Madigan
Founder/race director
Alpenglow Mountain Racing, LLC
Tahoe City, CA

Keely Wachs
Communications Director
Clif Bar & Company
Emeryville, CA

Brendan Madigan
Owner
Alpenglow Sports, Inc.
Tahoe City, CA

Kenji Haroutunian
President
Friends Of Joshua Tree
Joshua Tree, CA

Emily Hargraves
Owner
Backcountry Babes
Truckee, CA

Douglas Stoup
President
Ice Axe Expeditions
Truckee, CA

Chris Carr
Director
Shasta Mountain Guides
Mount Shasta, CA

Steve Frisch
President
Sierra Business Council
Truckee, CA

Colorado

Ryan Koupal
Founder/Director
40 Tribes Backcountry Adventures
Boulder, CO

Penn Newhard
Partner
Backbone Media
Carbondale, CO

Nicholas Legare
Sales Manager
Native Eyewear
Longmont, CO

Chris Conroy
President
Yeti Cycles
Golden, CO

Idaho

Chris Valiante
Owner
22 Designs
Driggs, ID

Tyson Stellrecht
Owner/CEO
Backcountry Pursuit, LLC
Boise, ID

Carl
Co-Founder
STOKE Certified
San Diego, CA

David Polivy
Owner
Tahoe Mountain Sports
Truckee, CA

Cindy Farny
Owner
High Camp LLC
Telluride, CO

Eric Greene
Division VP/GM
Kelty
Boulder, CO

Steve Lentz
President
Far and Away
Idaho

Michelle Reagan
President
Gravity Sports
McCall, ID

Jeff Lewerenz
Partner Greenwood's Ski Haus
Boise, ID

Chris Haunold
President
Idaho Mountain Touring
Boise, ID

Illinois

Randy Neufeld
SRAM Cycling Fund Director
SRAM LLC
Chicago, IL

Maine

Dave MacLeay
Publisher
Trailspace.com
Belgrade Lakes, ME

Montana

Austin Hart
Owner / Guide
Beartooth Mountain Guides, Inc.
Red Lodge, MT

Benjamin D Zavora
Owner
Beartooth Powder Guides LLC
Cooke City, MT

Marne Hayes
Executive Director
Business for Montana's Outdoors
Montana

Kelli Hart
Owner
Freeheel and Wheel
West Yellowstone, MT

Chris Lundy
Owner
Sawtooth Mountain Guides
Stanley, ID

Bob Rosso
Owner
The Elephant's Perch
Ketchum, ID

Linda Hersom
green peak promotions
Whitefish, MT

Drew Pogge
Owner/Guide
Montana Alpine Adventures
Bozeman, MT

Sam Magro
Owner/Lead Guide
Montana Alpine Guides, Inc
Bozeman, MT

Kate Ketschek
Founder, President
Revolution House Media
Big Sky, MT

Hans Howell
Owner
Roscoe Outdoor LLC
Red Lodge, MT

Dale Sexton
President
Timber Trails
Livingston, MT

New York

Vinny McClelland
Owner/Manager
The Mountaineer
Keene Valley, NY

Oregon

Russ Plaeger
Restoration Coordinator
Bark
Portland, OR

Kat Dierickx
CMO
Outdoor Project
Portland, OR

Tyler LaMotte
VP Global Brand Marketing
KEEN Footwear
Portland, OR

Daniel McGarigle
President
Pine Mountain Sports
Bend, OR

Utah

Dan Benschhoff
Marketing Director
DPS Skis
Salt Lake City, UT

Vermont

Ted Manning
CEO
Ibex Outdoor Clothing
White River Junction, VT

Tristan von Duntz
Events Director
Onion River Sports
Montpelier, VT

Washington

Dave Fitzgerald
President
Chillaz North America
Bainbridge Island, WA

Dan Nordstrom
CEO
Outdoor Research
Seattle, WA

Eric Hayes
CMO
Superfeet Worldwide
Bellingham, WA

Wyoming

Jamie Schectman
CEO
Mountain Rider's Alliance
Jackson, WY

Diane Verna
Owner/guide
Teton Backcountry Guides
Alta, WY

cc. Honorable Ryan Zinke, Secretary of the Interior
Honorable Sonny Perdue, Secretary of Agriculture
Senate Interior Appropriations Committee
House Interior Appropriations Committee

June 12, 2017

Mr. Mick Mulvaney, Director
Office of Management and Budget
725 17th St., NW
Washington, DC 20503

Dear Director Mulvaney:

The 124 undersigned organizations represent millions of Americans who partake in outdoor recreation on this nation's forests, parks, and other public lands. Our members ski, climb, mountain bike, paddle, hike, and camp on public lands and they reap enormous benefits from these experiences. To pursue these activities, our members depend on having access to federal lands where they can immerse themselves in nature with their friends and families, away from urban areas and development.

On March 13th 2017, the President signed Executive Order 13781 directing you to develop a plan for reorganizing the executive branch including recommending agencies, programs, and functions for elimination.¹ Subsequently, you launched a 28-day comment period asking the American public to weigh in on how to reorganize, reduce, and eliminate agencies.² **We write to you today to express our strong support for continued and robust investment in the conservation and recreation programs of the land management agencies: the U.S. Forest Service, U.S. Fish and Wildlife Service, National Park Service, and the Bureau of Land Management.** Together, these agencies administer on behalf of the American people 674 million acres of lands that see over half a billion visits annually.³

For a modest investment (less than 0.4% of the federal budget), our federal land management agencies generate innumerable benefits worth billions of dollars. They provide us clean water and air, trails and campgrounds, and unmatched outdoor recreation experiences. Most importantly, they provide the recreation infrastructure and opportunities that fuel a \$887 billion outdoor recreation economy that generates 7.6 million jobs.⁴ In the 12 Western states alone, the agencies manage 193,500 miles of hiking trails and 12,659 miles of mountain bike trails. Likewise, virtually all backcountry skiing, 43% of whitewater paddling, and 71% of climbing in the West occurs on lands managed by these agencies⁵.

Funding the recreation and conservation programs of these agencies has an outsized impact and is a great investment for the American people. Consider that recreational visits to parks, forests, refuges, and other public lands generate \$33 billion in direct spending and nearly 600,000 jobs, and contribute \$37 billion to GDP annually.⁶ Consider also that the clean water that our national forests provide to over 66

¹ <https://www.whitehouse.gov/the-press-office/2017/03/13/presidential-executive-order-comprehensive-plan-reorganizing-executive>

² 82 Fed. Reg. 22355 (March 15, 2017)

³ See US Forest Service, 2012. National Visitor Use Monitoring Report. Available at: https://www.fs.fed.us/recreation/programs/nvum/2012%20National_Summary_Report_061413.pdf. Page 24; National Park Service. Annual Visitation Highlights. Available at: <https://www.nps.gov/subjects/socialscience/annual-visitation-highlights.htm>; Department of the Interior, Bureau of Land Management. 2015. Public Lands Statistics. Page 186; U.S. Fish & Wildlife Service, 2015.

⁴ Outdoor Industry Association, 2017. The Outdoor Recreation Economy. Available at: <https://outdoorindustry.org/resource/2017-outdoor-recreation-economy-report/>

⁵ Data from Winter Wildlands Alliance, American Whitewater, and Mountain Project

⁶ U.S. Department of the Interior Economic Report, FY 2015. Prepared by the Department of the Interior Office of Policy Analysis, June 17, 2016. Available at: https://www.doi.gov/sites/doi.gov/files/uploads/fy2015_doi_econ_report_2016-06-20.pdf. Table 2-2. See also US Forest Service, 2012. National Visitor Use Monitoring Report. Available at:

https://www.fs.fed.us/recreation/programs/nvum/2012%20National_Summary_Report_061413.pdf. Page 24.

million people in 3,400 communities in 33 states is worth over \$7.2 billion annually.⁷ In that same vein, clean air, clean water and other ecological services provided by our National Wildlife Refuges provide \$32.3 billion in benefits to local communities.⁸

Outdoor recreationists understand the link between healthy lands and healthy lifestyles. **We therefore urge you not to cut – and in fact invest more – in the conservation and recreation programs administered by the US Forest Service, Bureau of Land Management, US Fish and Wildlife Service, and the National Park Service. Likewise, we fully support the Environmental Protection Agency.** The EPA and its programs ensure that our public lands provide clean air, clean water, and a healthy environment. Without the EPA our public lands will lose these essential qualities.

While we disagree with the premise that drastic changes to our federal land management agencies are necessary, to the extent that you intend to reorganize and possibly eliminate agencies, we respectfully request that you consider the importance of the federal land management agencies and their conservation and recreation programs. These include, but certainly are not limited to, the 1) Forest Service's Recreation, Wilderness, and Heritage; Legacy Roads and Trails; Trails; Land Management Planning, Assessment, and Monitoring; and Fisheries and Wildlife Habitat Management Programs; 2) the BLM's Recreation Resources Management, National Landscape Conservation System; 3) The Operation of the National Park System, National Recreation and Preservation, and many other accounts within the National Park Service budget; and 4) Cross-cutting programs like the Land and Water Conservation Fund.

Thank you for considering these comments.

Sincerely,

Adam Cramer
Executive Director
Outdoor Alliance
Washington D.C.

On behalf of the following organizations:

Alaska

Brian Okonek
President
Alaska Quiet Rights Coalition
Anchorage, AK

⁷ USDA Forest Service. Information on Water Resources. Available at:

https://www.fs.usda.gov/wps/portal/fsinternet/cs/detail/!ut/p/z0/04_Sj9CPyKssy0xPLMnMz0vMAfj08zjiQwgwNHCwN_DI8zPyBcqYKBfkO2oCA8Zcx5g/?position=Contribution%20Content.html&pname=Forest%20Service&ss=119995&navtype=SubNavigation&pnavid=110140100000000&navid=1101401100000000&ttype=detail&cid=stelprdb5107778

⁸ Southwick Associates, 2011. The Economics Associated with Outdoor Recreation, Natural Resources Conservation and Historic Preservation in the United States For: The National Fish and Wildlife Foundation. Available at:

<https://www.fws.gov/refuges/news/pdfs/TheEconomicValueofOutdoorRecreation%5B1%5D.pdf>

Alabama

Tom Nelson, DVM
President
Northeast Alabama Bicycle Association
Annsiton, AL

Mary Anne Swanstrom
President
SORBA Huntsville
Huntsville, AL

James Wells
President
Southeastern Alabama Mountainbikers
Dothan, AL

Joe Fuller
Chapter President
West Alabama Mountain Bike Association
Tuscaloosa, AL

Arizona

Lorraine Montuori
President
Desert Foothills Mountain Bike Association
Cave Creek, AZ

Brent Roberts
Board President
Prescott mountain Bike Alliance
Prescott, AZ

Michael Bonnette
President
Rim Country Mountain Biking Association
Payson, AZ

California

Steve Messer
President
Concerned Off-Road Bicyclists Association
Los Angeles, CA

Nate Greenberg
President
Eastern Sierra Avalanche Center
Mammoth Lakes, CA

Kenji Haroutunian
President
Friends Of Joshua Tree
Joshua Tree, CA

Darrel Jury
President
Friends of Plumas Wilderness
Meadow Valley, CA

Wendy Schneider
Executive Director
Friends of the Inyo
Bishop, CA

Tom Johnson
Board President
Mammoth Lakes Recreation
Mammoth Lakes, CA

John Wentworth
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Foundation
Mammoth Lakes, CA

Geoffrey McQuilkin
Executive Director
Mono Lake Committee
Lee Vining, CA

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San Diego, CA

Steve Larson
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SHARE Mountain Bike Club
Corona Del Mar, CA

David Reichel
President
Tahoe Backcountry Alliance
South Lake Tahoe, CA

Colorado

Erik Murdock
Policy Director
Access Fund
Boulder, CO

Jonathan Cox
President
Advance Colorado Fund - Bailey Hundo
Palmer Lake, CO

Maria Povec
Policy Director
American Alpine Club
Golden, CO

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Co-founder
berbur, llc
Denver, CO

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Executive Director
Sierra Buttes Trail Stewardship
Graeagle, CA

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Sierra Eastside Mountain Bike Association
(SEMBA)
Mammoth Lakes, CA

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Snowlands Network
Campbell, CA

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Boulder Area Trails Coalition
Boulder, CO

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Boulder, CO

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Boulder, CO

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Executive Director
Colorado High School Cycling League
Boulder, CO

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Colorado Mountain Bike Association
Denver, CO

Julie Mach
Conservation Director
Colorado Mountain Club
Golden, CO

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Founder / Board Member
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Erie, CO

Nicholas Jimroglou
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High County River Rafters
Wheat Ridge, CO

Al Head
Stewardship Coordinator
The Golden Giddyup
Golden, CO

Delaware

Dave Ellegood
President
Cape Fear SORBA
Wilmington, DE

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International Mountain Bicycling Association
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Kenny Bearden
Executive Director
Overland Mountain Bike Club
Fort Collins, CO

Lindsay Bourgoine
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Roaring Fork Mountain Bike Association
Aspen, CO

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Salida, CO

Maureen Hall
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Silent Tracks
Crested Butte, CO

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Flagler Area Biking SORBA
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Florida Mudcutters
Fort Myers, FL

Georgia

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Andrew Kloster
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CVA SORBA
Columbus, GA

Mike Palmeri
President
Ellijay Mountain Bike Association
Ellijay, GA

Lisa Broughton
President
Gwinnett Area Trail Riders
Lawrenceville, GA

Woody and Kathy Wood
Owners
Woody's Mountain Bikes
Helen, GA

Jared Hartman
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Ocala Mountain Bike Association
Ocala, FL

Jose Sanchez
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Tallahassee Mountain Bike Association
Tallahassee, FL

Lisa Randall
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Chris Sieverson
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SORBA West Georgia
Hiram, GA

Jay Wilkes
President
SORBA Woodstock
Woodstock, GA

Tom Sauret
Executive Director
Southern Off-Bicycle Association
Gainesville, GA

Idaho

John Robison
Public Lands Director
Idaho Conservation League
Boise, ID

Sarah Michael
President
Nordic and Backcountry Skiers Alliance of Idaho
Sun Valley, ID

Tim Adams
Executive Director
Teton Valley Trails And Pathways
Driggs, ID

Mark Menlove
Executive Director
Winter Wildlands Alliance
Boise, ID

Brett Stevenson
Board Chair
Wood River Bicycle Coalition
Sun Valley, ID

Mississippi

Timothy Phelps
President
North Mississippi Trail Alliance
Olive Branch, MS

Jeremy Polk
President
Tri-County Mountain Bike Association
Madison, MS

Montana

Tom Kohley
Chairman
Beartooth Recreational Trails Association
Red Lodge, MT

Hilary Eisen
Member Representative
Outdoor Alliance Montana
Bozeman/Missoula, MT

Lance Pysher
President
Bitterroot Backcountry Cyclists
Hamilton, MT

Chad Broderius
Chair
Pedal United
Billings/Red Lodge, MT

Greg Peters
President
Montana Backcountry Alliance
Missoula, MT

Ian Jones
President
Southwest Montana Mountain Bike Association
Bozeman, MT

Ben Horan
Executive Director
MTB Missoula
Missoula, MT

Claudine Tobalske
WMTCC Chair
Western Montana Climbers Coalition
Missoula, MT

North Carolina

Kevin Colburn
National Stewardship Director
American Whitewater
Cullowhee, NC

John Gannon
President
Nantahala Area Southern Off-Road Bicycling
Association
Cullowhee, NC

Jack Brown
President
Northwest North Carolina Mountain Bike
Alliance
Lenoir, NC

Stephen C. Williams
President
Piedmont Fat Tire Society
Greensboro, NC

Emily Watts
President
Tarheel Trailblazers
Charlotte, NC

David Houskeeper
President
Triangle Off-Road Cyclists
Morrisville, NC

New Hampshire

Tyler T. Ray
Granite Chief
Granite Backcountry Alliance
North Conway, NH

New Jersey

Ellen Moskowitz
Trustee Kayak and Canoe Club of New York
New Jersey

New Mexico

Daniel Roberts President
Albuquerque Mountain Bike Association
Albuquerque, NM

Shelley Longmire
Current board member
Santa Fe Fat Tire Society
Santa Fe, NM

Mary Ann DeBoer
President
Chama Valley Outdoor Club
Chama, NM

Nevada

Paul W. Papa
President
Southern Nevada Mountain Bike Association (SNMBA)
Las Vegas, NV

New York

Rob Cook
President
Cycle-CNY: Chapter of International Mountain
Bicycling Association
Ithaca, NY

Christine Guarino
Vice President
Fats in the Cats
Kingston, NY

Christopher Trombley
Program Director
NYCMTB
New York, NY

Margaret Siller
Treasurer
Zoar Valley Paddling Club
Buffalo, NY

Oregon

Russell Plaeger
Restoration Coordinator
Bark
Portland, OR

Lance Colburn
Secretary
Blue Mountain Singletrack Trails Club
La Grande, OR

Russell Pascoe
Conservation Chair
Lower Columbia Canoe Club
Portland, OR

Adam Baylor
Stewardship and Communications Manager
Mazamas
Portland, OR

Chris Rotvik
President
Northwest Trail Alliance
Portland, OR

Russ Pascoe
Board member
Oregon Kayak and Canoe Club
Portland, OR

Robert Alan Ping
Chief Instigator and NCI race league director
Oregon Youth Mountain Biking
Portland, OR

Wayne Clark
Board President
Team Dirt
Corvallis, OR

Pennsylvania

Lisa Zaverack
President
Anthracite Mountain Pedalers
Forty Fort, PA

David A. Kurtz
Assistant Scoutmaster
Boy Scout Troop 32
State College, PA

David A. Kurtz
President and Chief Coach
Mach One Slalom Team
Bellefonte, PA

Cat Newsom
President
Southeastern Pennsylvania Trail Riders
Philadelphia, PA

South Carolina

Steve Masone
President
Midlands SORBA
Columbia, SC

Tennessee

Jason Campbell
President
SORBA Mid TN
Nashville, TN

Utah

Tracy Bentley
Shop Owner
Chile Pepper Bike Shop
Moab, UT

Lukas Brinkerhoff
President
Dixie Mountain Bike Trails Association
St. George, UT

Chris Adams
Board President
Wasatch Backcountry Alliance
Salt Lake City, UT

Tracy Bentley
Board Chair
Moab Mountain Bike Association
Moab, UT

Trina Hedrick
Secretary-Treasurer
Northeastern Utah Mountain Bikers
Vernal, UT

Virginia

Mike Aronoff
Owner
Canoe Kayak and Paddle Co. LLC
Vienna, VA

Greg Rollins
President
rvaMORE
Richmond, VA

Washington

Gus Bekker
President
El Sendero Backcountry Ski and Snowshoe Club
Wenatchee, WA

Yvonne Kraus
Executive Director
Evergreen Mountain Bike Alliance
Seattle, WA

John Latta
Founder
Inland Northwest Backcountry Alliance
Spokane, WA

Jon Hoekstra
Executive Director
Mountains to Sound Greenway
Seattle, WA

David Mainer
President
Paddle Trails Canoe Club (200+ members)
Seattle, WA

Ernest Rodriguez
President
Mid-Atlantic Off-Road Enthusiast (MORE)
Fairfax, VA

Luke Bakken
Conservation Committee Chair
Spokane Mountaineers
Spokane, WA

Jennie Goldberg
Director
The League of Northwest Whitewater Racers
Seattle, WA

Katherine Hollis
Conservation and Advocacy Director
The Mountaineers
Seattle, WA

Shanna Gachen
Membership Chair
Washington Kayak Club
Seattle, WA

Andrea Imler
Advocacy Director
Washington Trails Association
Seattle, WA

Wyoming

Charles Manganiello
Executive Director
Togwotee Backcountry Alliance
Lander, WY

Marco Restani
Executive Director
Wyoming Wilderness Association
Sheridan, WY

cc. Honorable Ryan Zinke, Secretary of the Interior
Honorable Sonny Perdue, Secretary of Agriculture
Senate Interior Appropriations Committee
House Interior Appropriations Committee

Chief Tom Tidwell
USDA Forest Service
1400 Independence Ave, S.W.
Washington, DC 20250

Acting Deputy Undersecretary Dan Jiron
United States Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

May 15, 2017

Dear Acting Deputy Undersecretary Jiron and Chief Tidwell:

As you know, the undersigned organizations represent millions of Americans who deeply care about our national forests and grasslands. Our members and supporters value these public lands for the water and clean air they provide to communities, the outdoor recreation they offer, the wildlife they harbor, and the resources they contain.

President Trump recently issued three executive orders (EO) requiring various reviews of the Forest Service's organization, policy, and regulations: *EO 13781 - Presidential Executive Order on a Comprehensive Plan for Reorganizing the Executive Branch*, *EO 13777 - Enforcing the Regulatory Reform Agenda*, and *EO 13783 - Presidential Executive Order on Promoting Energy Independence and Economic Growth*.

EO 13781 directs agency heads to prepare a plan within 180 days to reorganize to improve efficiency, effectiveness, and accountability. EO 13777 directs agencies to create a Regulatory Reform Task Force to evaluate current regulations and make recommendations. EO 13783 directs agencies to review existing regulations, policies, and other similar actions that potentially burden the development or use of domestically produced energy resources.

We write today to request respectfully that you implement these orders in a transparent and inclusive way. Many diverse stakeholders including the undersigned invested significant resources into the development and implementation of Forest Service programs, policies, and initiatives. It only makes sense that these same stakeholders are included in any process you develop to evaluate and make recommendations about your programming and policies, and to provide feedback to any subsequent proposals put forth by the administration.

Regarding EO 13777, which requires the Regulatory Reform Task Force to seek input and assistance from entities significantly affected by federal regulations including non-governmental organizations and trade associations, we request the opportunity to participate – either by representation on the task force or otherwise – in the Forest Service's Regulatory Reform Task Force review.

We urge you to ensure that any decisions made about public land management policies and decisions are done out in the open with the full involvement of the American people, and with the utmost care for the remarkable resources that you steward. We thank you for considering these requests.

With regards,

The Wilderness Society

www.wilderness.org

American Rivers

<https://www.americanrivers.org/>

Defenders of Wildlife

<http://www.defenders.org/>

Earthjustice

<http://earthjustice.org/>

GreenLatinos

<http://www.greenlatinos.org/>

Physicians for Social Responsibility

<http://www.psr.org>

Sierra Club

<http://www.sierraclub.org/>

Southern Environmental Law Center

<https://www.southernenvironment.org/>

Western Environmental Law Center

<http://www.westernlaw.org/>

WildEarth Guardians

<http://www.wildearthguardians.org>