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November 9, 2015

Lance Porter  
District Manager, Canyon Country District  
Bureau of Land Management  
82 East Dogwood  
Moab, Utah 84532

**RE: Comments on the Moab MLP/DEIS**

Dear Mr. Porter:

We commend the U.S. Bureau of Land Management for the hard work, smart thinking, and collaboration that has gone into the Moab Master Leasing Plan. The effort has clearly paid off, and the BLM is on the road to striking the right balance between the protection of outdoor recreation resources and responsible energy development on public lands in the Moab area.

Based in Boulder, Colo., with offices in Washington, D.C., Outdoor Industry Association is the leading trade association for the outdoor industry and the title sponsor of Outdoor Retailer. OIA supports the growth and success of more than 4,000 employees of manufacturers, distributors, suppliers, sales representatives and retailers of outdoor recreation apparel, footwear, equipment and services.

The BLM's work on the draft Moab plan is critical given the importance that outdoor recreation plays in the economy for both Moab and the state of Utah. Every year, consumers in Utah spend upwards of \$12 billion on outdoor recreation activities alone. This spending, in turn, provides more than \$3.5 billion in annual wages and salaries and directly supports more than 120,000 jobs. Additionally, consumer spending on outdoor recreation in Utah generates more than \$850 million in tax revenue for state and local governments.

Further, the National Parks and other public lands in Utah, including those subject to this Plan, form the backbone of the state's vibrant outdoor recreation economy. National Parks provide approximately \$1 billion in economic output every year for Utah, and Arches and Canyonlands—the two Parks bordering the planning area— together generate nearly \$150 million. Additionally, BLM lands in Utah provide another \$70 million in annual economic output related to outdoor recreation activities.

Utah Gov. Gary Herbert has called for increasing investment in the outdoor recreation and tourism economy as a way to boost state revenues from \$1 billion to \$1.2 billion by 2020. Given the strength and resilience of the outdoor recreation industry, that's

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wise advice. However, to grow the recreation economy in Utah, business owners and manufacturers need to have certainty that these recreation opportunities will be there tomorrow in order to make investments today.

The work that BLM is forging on the draft Moab plan can be a model for how different interests can work together to find win-win solutions and provide certainty to both outdoor recreation businesses and oil and gas companies.

These economic figures and goals illustrate an important reason why the Moab plan must provide adequate protections for recreational resources: to protect Utah's robust outdoor recreation economy. While we believe the Moab Master Leasing Plan is headed in the right direction, we would also like to offer-up support for a few important changes from the draft plan that would help ensure strong protections for Moab's outdoor recreation resources, including:

- broadening or lengthening energy development setbacks around developed recreation sites such as overlooks, viewpoints, campgrounds, and trailheads.
- providing or applying setbacks to protect key recreation routes, including hiking trails and climbing and canyoneering areas; and
- strengthening protections along the Green River and Colorado Rivers, and improve protections for their tributaries and connected water bodies, to ensure that water quality and scenic values will not be compromised by energy development.

Again, we applaud the BLM for the great work to date in development the Moab Master Leasing Plan. With a few changes, we are confident that the final plan can and should protect the most valuable outdoor recreation resources in the planning area, while still allowing for responsible energy development. Thank you for considering our comments.

Sincerely,

Jessica Wahl  
Outdoor Recreation Advisor  
Outdoor Industry Association