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The RV Industry Association (RVIA) appreciates the opportunity to comment on the Proposed Rule by the Bureau of Land Management on Conservation and Landscape Health, specifically regarding management of public lands for multiple uses and prioritizing the resilience of ecosystems across those lands.

The RV Industry Association is the national trade association representing approximately 495 manufacturers and component and aftermarket suppliers who together build more than 98 percent of all RVs produced in the United States—including motorhomes, travel trailers, fifth-wheel travel trailers, folding camping trailers, park model RVs, and truck campers. The RV industry contributes more than \$140 billion to the national economy and is a quintessentially American industry that supports 680,000 jobs paying more than \$48 billion in wages. The RV Industry Association is the unifying force for safety and professionalism within the RV industry and works with federal and state policymakers to promote and protect the RV industry and sustainable use of our public lands.

The RV Industry Association is pleased that the Proposed Rule recognizes that the outdoor recreation economy is dependent on responsible and sustained use of our nation’s public lands and waters. Outdoor recreation and RV camping are critical to America’s national interest and are an essential part of the American economy. Outdoor recreation is an \$862 billion industry, providing 4.5 million American jobs and boosting economies in communities large and small. And studies have shown that enjoying time outside helps benefit a person’s mental and physical health. Additionally, outdoor recreation brings international visitors to our country and families closer together. It connects Americans to our natural history. It inspires young people, offers unique moments for all to enjoy, and encourages conservation and stewardship of our shared environment.

We draw attention to four particular areas in the Proposed Rule. The RV Industry Association:

- 1. agrees that recreation is consistent with the BLM goal of creating resilient public lands and ecosystems.***
- 2. agrees that recreation does not degrade landscapes.***
- 3. believes coordination with local communities and recreation partners will be critical to developing reasonable restoration objectives.***
- 4. believes that the “casual use” definition related to conservation leases should not preclude the public from accessing public lands for camping and other outdoor recreation activities.***

Each of these items is discussed in more detail below.

### **1. Resilient Public Lands (Section 6101.2 Objectives)**

RVIA understands the importance of maintaining the resilience of ecosystems across BLM lands. We agree that the term “multiple use” means management of public lands to meet current and future needs of the American people. The RV Industry Association is pleased to see BLM recognize that balanced and

diverse resource use includes maintaining public lands for future generations while providing robust access to the outdoors through camping and other forms of recreation.

## **2. Management to Protect Intact Landscapes (Section 6102.2)**

The RV Industry Association supports balanced policies that conserve federal lands so that they can be accessed and enjoyed today and by future generations of Americans. During the planning process, we encourage BLM to coordinate with local communities and outdoor recreation stakeholders so that the areas being restored can benefit and maximize the public's use of them.

Outdoor recreation in rural and gateway communities in particular is a significant driver for economic prosperity, growth, and resiliency across the country. We agree that BLM should work with communities and outdoor recreation stakeholders to identify and safeguard geographic areas important to their strategic growth and development.

## **3. Restoration of Degraded Landscapes (Section 6103.3)**

We understand BLM's imperative to steward public lands and maintain functioning ecosystems. Restoration is not inconsistent with recreation and camping. For example, BLM and other public land management agencies currently allow dispersed camping outside of a designated campground on lands that are managed for this purpose. Since dispersed camping involves strict guidelines and no connections to water, electricity, and sewer that one finds in a developed campground, the impact on the land and ecological values is minimal.

As BLM enters into restoration planning, programs, and permitting, the RV Industry Association encourages the agency to consider limits on the acreage or areas that can be closed via conservation leases at any one time in order to achieve stated objectives or, alternatively, to try pilot programs first. Coordination with local communities and recreation partners will be critical to developing timely and reasonable restoration objectives.

## **4. Conservation Leases and Public Land Access for Noncommercial Activities- (Section 6102.4)**

The RV Industry Association cites two items of concern related to BLM's authorization of conservation use on public lands. First, any temporary closures should be clearly defined, limited, and publicly noticed so as not to impact outdoor recreation indefinitely. Here again, engagement and coordination with stakeholders is key prior to any closures to ensure they minimize impact. Second, we encourage public lands leased for conservation purposes under the proposed rule to remain open. When considering applications for conservation leases, it is important for BLM to closely review the proposed uses and activities.

We are pleased with the specific statement, "*This provision is not intended to preclude other uses such as grazing, mining and recreation.*" The Final Rule must include this imperative when describing what actions conservation leases may allow.

## **Concluding Thoughts**

The outdoor recreation economy is dependent on responsible and sustained use of our nation's public lands and waters. The conservation lease proposal should allow, where appropriate, outdoor recreation and RV camping. RV camping provides the public with opportunities to take part in America's iconic outdoor recreation experiences, and encourages stewardship, conservation, and enjoyment of our beloved federal lands.