



**CONSERVATION  
LANDS  
FOUNDATION**



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Michael Hagen  
Senior Examiner  
Office of Management and Budget  
Transmitted online to: [mhagen@omb.eop.gov](mailto:mhagen@omb.eop.gov)

Dear Mr. Hagen,

It is our understanding that the OMB is reviewing our request from August 2021 to the Bureau of Land Management (BLM) that fiscal year budgets include specific line items for the National Trails System (NTS) and the National Wild and Scenic Rivers System (WSRS). The undersigned organizations and their members, representing national conservation nonprofit and community-based stewardship organizations across America, write to reiterate the need for this long-overdue change in the BLM Budget.

This is important to the stewardship efforts our groups consistently deliver. Line items would provide transparency and accountability for our partnerships, which are vital to the conservation and maintenance of the public lands administered by the BLM.

The NTS and WSRS are beloved by millions of Americans and people from around the world. The NTS includes 11 National Scenic Trails, 19 National Historic Trails and countless recreation trails. The WSRS protects 13,412 river miles and millions of acres of riverside lands on 226 free-flowing rivers. Rivers and trails cross public and private land and are administered by federal land management agencies, including the BLM, in partnership with nonprofit trail and river organizations. These two systems encompass unique natural resources that serve as essential and

equitable access corridors for public lands recreation by all Americans, including underserved communities.

### **The Importance of Budget Transparency for Partnerships**

Without highly successful public-private partnerships, the NTS would fall into disrepair. While government land managers bring expertise, oversight and funding, the nonprofits raise and leverage the bulk of funds spent to steward the NTS and manage the volunteers who do most of the physical labor to maintain our nation's trails. Additionally, the nonprofits hire staff to oversee those volunteers, promote safe usage, provide education and public information, protect land and landscapes, and advocate for the trails with the public and the government.

From 1995-2021, for example, the nonprofits that make up the Partnership for the National Trails System (PNTS) contributed significant resources to the protection and maintenance of our nation's most significant trails. During that time, volunteers worked more than 23 million hours valued at more than \$453 million. Additionally, private donations toward that effort were more than \$260 million. In all, the value of the PNTS contribution to our nation's trails was nearly \$713 million over the last 25 years.

Similarly, partnerships to manage the WSRS are crucial and have expanded following the success of the Wild and Scenic Rivers Act's 50th anniversary in 2018. Today, nonprofit partners provide training for land management staff on planning, visitor use capacity and other topics; monitor water quality; and leverage federal funds for education programs and outreach to diverse communities. Since its creation in 2018, the River Management Society's River Training Center has offered more than 40 river management training events reaching more than 1800 professionals and leveraging more than \$400,000 in federal funding. Over the past three years, River Network's Wild and Scenic River Stewardship Partnership Funding grant program has leveraged \$250,000 with grants totaling \$150,000 to 17 river organizations for diversity and education outreach. Adventure Scientists began working with the federal river management agencies in 2019 on a project to assess water quality across the Wild and Scenic River System. Since then, volunteers have donated nearly 13,700 hours at a value of \$565,000 to collect water quality data samples through Adventure Scientists' network of community scientists.

Due in large part to decreased capacity, BLM continuously and increasingly fails to draft, update, execute and monitor Comprehensive River Management Plans for the WSRS flowing through BLM land. The number of agency staff dedicated to river management throughout the system has declined significantly in the last 20 years, while new designations have continued to protect more rivers that now require planning and management. For example, of the 11 new rivers designated under the John D. Dingell, Jr. Conservation, Management, and Recreation Act of 2019, six are managed by the BLM. Overall, the BLM manages just over 20% of the WSRS.

**Partnerships for both rivers and trails require budget transparency to ensure that nonprofit projects receive the necessary agency staff support and planning to align with overall management agency goals.** Budget transparency would more effectively help us to advocate for adequate agency funding and staffing, both to support partnerships and manage our nation's protected rivers and trails.

## **The Problem**

As we've noted in previous correspondence, this is a long, ongoing deficiency. The BLM has no specific accounts in its budget for funding Congressionally-designated national trails or rivers — including three National Historic Trails, portions of 13 other national trails, and 64 wild and scenic rivers that the agency is charged with managing by law. While Congress may dedicate funding for rivers and trails, the BLM does not account for the money in a way that reveals to nonprofits, regional land managers, or the public how much is intended for each river or trail and how much is ultimately allocated for this purpose. In other words, to us, the BLM budget appears as a black hole.

This lack of transparency makes it impossible for essential nonprofit partners to support both Congress and the agency in ensuring funding for river and trail stewardship, and more practically, difficult to plan for trail maintenance projects, especially large repair or infrastructure improvement projects, volunteer monitoring efforts, proper visitor use management, and the timely completion of Comprehensive River Management Plans, which would clearly recognize and manage for the Outstandingly Remarkable Values of each WSR.

In contrast, the U.S. Forest Service budget represents a successful model that includes line-item funding for the six national trails it administers and the 16 it manages in part. This “Construction and Maintenance for Trails” budget line, known as the CMTL, sends clear direction from Congress to the agency about its intention for annual federal spending on our trails system. Further, the CMTL is broken down in sub-categories by individual trails, for example, CMTL-PC for the Pacific Crest National Scenic Trail.

For years we have sought a remedy for agency's lack of budget transparency from Congress, the BLM itself, and your office, to no avail, despite seemingly broad agreement by all these entities that the pursuit of line items would be prudent. Each party requires another party to initiate the change first. This constant run-around has left conversations in a stalemate and has contributed to the less-than-ideal condition of our designated national trails and rivers for both the agency and visitors alike. This at a time when the use of public lands has skyrocketed because of the COVID-19 pandemic and climate-related disasters such as large wildfires, landslides and drought are rapidly changing these special places for the worst, especially in the West.

## **The Solution**

**To resolve this issue, we urge the creation of unit-level allocations within major sub-activities for each of the scenic and historic trails and wild and scenic rivers that BLM manages, and we urge this to begin with the drafting of the BLM budget for FY24.** The BLM budget already includes specific line items for funds dedicated to national monuments, wilderness areas and conservation areas — within a new activity account for the National Landscape Conservation System. The BLM's lack of a unified budget account for rivers and trails prevents the agency from efficiently planning, implementing, reporting, and taking advantage of cost-saving and leveraging partnerships and volunteer contributions for every activity related to the national river and trail systems.

We believe the agency can do more within its budgeting process to ensure that rivers and trails are sustainably stewarded for future generations, and we hope that we can work together to break the decision-making stalemate and make these budget improvements.

We appreciate your prompt attention to this long-standing issue, and we are at the ready to answer your questions. Thank you in advance for your consideration and for your ongoing support of the National Trails System and the National Wild and Scenic Rivers System.

Sincerely,



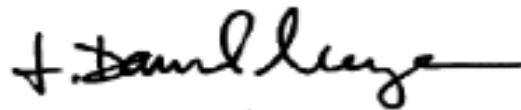
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