

July 22, 2021

Nada Culver  
Deputy Director, Policy and Programs  
Bureau of Land Management  
760 Horizon Drive  
Grand Junction, CO 81506

Dear Deputy Director Culver:

Our organizations are writing in regard to the Bureau of Land Management's (BLM) Ground Transportation Linear Feature (GTLF) data standard, which serves as the agency's national geospatial transportation layer. We believe this geospatial layer could be used to convey detailed travel management regulations to the public—thereby providing equitable access to the outdoors and reducing unintentional legal violations—and we request that changes be made to the GTLF minimum standard to facilitate this purpose.

As you know, handheld Global Positioning Satellite (GPS) devices and smartphone applications have transformed the ways in which Americans access and navigate public lands. This technology has enabled the public to discover new areas to explore and experience by providing an unprecedented level of confidence that they are within the bounds of public land and following agency regulations. GPS mapping applications have become so popular in recent years that private sector navigation products are now available for hunters and anglers, skiers, bicyclists, paddlers, off-highway vehicle enthusiasts, and other recreationists. Real-estate agents, farmers, ranchers, game wardens, firefighters, and a host of other professionals have similarly come to rely on these technologies. And these navigation products are affordable, often costing under \$30 a year—less than a tank of gas.

Unfortunately, when it comes to public lands, incomplete and inconsistent mapping data prevents the public from utilizing the full benefit of these technologies. One of the major challenges is that some agency geospatial data layers were not designed to convey recreational access information to the public.

One such example is the BLM's GTLF, which depicts linear features—including designated roads, primitive roads, and trails—in geospatial form. Because the GTLF minimum standard does not require attributes that indicate 1) the open and closed status of roads and trails, 2) seasonal vehicle restrictions on roads and trail, and 3) allowed vehicle type, this dataset fails to convey important access information to the public.

For example, the BLM Butte Field Office in southwest Montana completed a travel management plan (TMP) for the Upper Big Hole area in 2009, which established comprehensive rules for vehicle travel on specific designated routes and during specific times of the year. The BLM invested considerable time and resources to create a TMP that provides adequate public access while conserving important deer and elk habitat and reducing watershed impacts. However, because the national GTLF is lacking in important attributes, detailed transportation information for the Upper Big Hole area can only be found by those with the skills to locate and review an environmental impact statement. Under these circumstances, most members of the public wanting to understand and follow agency transportation rules must rely on good signage on the ground—a difficult thing for the BLM to maintain with limited budgets and considerable miles of roads and trails to physically mark.

Equally problematic, because transportation rules are difficult to access and understand, public land users are unknowingly violating agency regulations that the BLM spent millions of dollars creating. The result is increased user conflict and frustration, as well as damage to sensitive natural and cultural resources.

This challenge is not limited to Montana. The BLM has completed TMPs on approximately 20 percent of the 245 million acres administered by the agency, yet recreation-friendly TMP geospatial data is not publicly available for most areas. In fact, the only places where useful geospatial transportation information has been made available is where local BLM offices have developed more thorough transportation layers than required by the GTLF.

Fortunately, the fix to this challenge appears relatively straightforward: The BLM could increase the minimum standard for the GTLF to require including the open and closed status of roads and trails, seasonal vehicle restrictions on roads and trails, and allowed vehicle type. Doing so would not only make BLM transportation information more readily accessible to all Americans, it would help ensure that outdoor recreators are following the rules that the BLM spent countless dollars creating, thus keeping the public safe and preventing damage to the resources administered by the agency.

Thank you for considering our request. We look forward to discussing this opportunity in more detail.

Sincerely,

- Backcountry Hunters & Anglers
- Izaak Walton League of America
- Mule Deer Foundation
- National Deer Association
- National Wild Turkey Federation
- Outdoor Recreation Roundtable
- Pheasants Forever
- Quail Forever
- Theodore Roosevelt Conservation Partnership
- Trout Unlimited
- Wildlife Management Institute

CC:

Mark Lambrecht, BLM Assistant Director for the National Landscape Conservation System  
Kevin Oliver, BLM Division Chief of Recreation