



February 2, 2024

Ms. Linda Walker, Acting Director  
Ecosystem Management Coordination  
United States Forest Service  
201 14th Street SW, Mailstop 1108  
Washington, DC. 20250-1124

*Submitted via <https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>*

**Re: Land Management Plan Direction for Old-Growth Forest Conditions across the National Forest System.**

Dear Ms. Walker,

Outdoor Alliance, The Conservation Alliance, and Outdoor Industry Association (the "Protecting America's Outdoors Coalition") appreciate the opportunity to comment on the Notice of Intent (NOI) for Land Management Plan Direction for Old-Growth Forest Conditions across the National Forest System (hereafter "proposed plan amendment"). Our organizations strongly support the proposed plan amendment, which provides the direction needed to protect old-growth forests and to expand their extent, where appropriate, for their ecological, cultural, climate, and recreational benefits. These comments summarize our community's perspectives on the NOI, including areas of emphasis, questions, and recommendations for improvement, particularly relating to old-growth forests' outstanding recreational values.

Protecting mature and old-growth (MOG) forests is a critically-important nature-based climate solution that supports mutually beneficial outcomes for biodiversity, water quality, outdoor recreation, and more. Our organizations have supported the U.S. Forest Service's (USFS) ongoing work to conserve MOG forests since the signing of Executive Order 14072, "Strengthening the Nation's Forests, Communities, and Local Economies" in 2022. Since that time, we provided

comments to inform the initial MOG definition and inventory,<sup>1</sup> participated in multiple facilitated discussions on old-growth conservation with USFS staff and other stakeholders, and also highlighted MOG forest conservation as an important climate mitigation strategy in our comments on the Advanced Notice for Proposed Rulemaking for National Forest and Grassland Climate Resilience.<sup>2</sup> We are pleased that the NOI reflects the collaborative input expressed by our organizations and other stakeholders throughout this process, and that the proposed plan amendment generally provides strong protections for old-growth forests. We especially appreciate that the proposed forest plan amendment:

- Expresses clear national intent to protect and maintain old-growth forest conditions;
- Explicitly references the social and cultural values of old-growth forests, including their recreational values;
- Advances old-growth forest conservation and wildfire resilience simultaneously, including through science-based guidance for restoration projects in and around old-growth stands;
- Incorporates Indigenous Knowledge into multiple aspects of old-growth conservation;
- Provides guidance for conserving mature forests so that these forests develop old-growth characteristics over time; and
- Facilitates ongoing collaboration between land managers, local governments, Tribes, and stakeholders.

We also have some concerns with the proposed plan amendment, especially regarding how and where the amendment will be implemented. We respectfully

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<sup>1</sup> See, Outdoor Alliance, Comments on 87 F.R. 42493, Request for Information (RFI) on Federal old-growth and Mature Forests (2022), available at <https://static1.squarespace.com/static/54aabb14e4b01142027654ee/t/6317cbf95cc7dc6fe7e5297b/1662503929409/OA+USFSBLM+Old+%26+Mature+Forests+Comment.pdf>.

<sup>2</sup> See, Outdoor Alliance, The Conservation Alliance, and Outdoor Industry Association, Comments on 88 FR 24497, Organization, Functions, and Procedures; Functions and Procedures; Forest Service Functions (2023), available at <https://static1.squarespace.com/static/54aabb14e4b01142027654ee/t/64bab07c05c92078389a7356/1689956476963/OA+OIA+TCA+Climate+Resilience.pdf>.

offer the following recommendations to improve the proposed plan components and to inform the draft environmental impact statement (DEIS):

1. Clarify where the proposed plan components will apply;
2. Better integrate outdoor recreation into the proposed plan components;
3. Strengthen the proposed objective to require measurable improvements in old-growth desired conditions in more than one landscape;
4. Define the term “proactive stewardship” and describe regionally and locally-appropriate proactive stewardship strategies;
5. Strengthen the proposed standards;
6. Consider the USFS’ capacity to implement the proposed plan amendment.

These recommendations, along with our comments on the proposed plan components, are outlined in more detail below.

### **Old-Growth Forests and Outdoor Recreation**

Mature and old-growth forests support a wide range of critical ecosystem services and also provide spectacular settings for outdoor recreation activities throughout the National Forest System (NFS). Recreationists greatly appreciate recreating in and around older forests, and older forests are commonly cited as an important recreational value in guidebooks and online resources for climbing, mountain biking, paddling, hiking, skiing, and other recreational pursuits. Visiting these forests allows recreationists to gain a deeper understanding of the natural history of our public lands, which in turn helps members of our community develop a lasting stewardship ethic that can support forest conservation over time. Protecting these experiences for present and future generations is a high priority for the outdoor recreation community.

The connection between older forests, outdoor recreation, and the outdoor economy is articulated well in Section 1 of Executive Order 14072 on “Strengthening the Nation's Forests, Communities, and Local Economies,” which states:

“We go to these special places to hike, camp, hunt, fish, and engage in recreation that revitalizes our souls and connects us to history and nature. Many local

economies thrive because of these outdoor and forest management activities, including in the sustainable forest product sector.”

Old-growth forests provide distinct settings for outdoor recreation activities that draw recreationists from multiple disciplines to old-growth sites. Specific recreational values that may be present in old-growth forests include:

- Scenic values of large/older trees;
- Opportunities to view natural processes and understand natural history;
- Opportunities to better understand Indigenous land management;
- Opportunities to view old-growth dependent wildlife;
- High water quality and natural flow regimes in rivers and streams within and downstream of old-growth forests;
- Open forest structure (in dry forests) that facilitates cross-country travel.

Because of widespread logging and development over the past two centuries, along with impacts from high severity fire, insects and disease, and other disturbance agents, old-growth forests are relatively rare across federal public lands. While many well-known old-growth sites exist across National Park Service lands, the location and extent of old-growth forests on National Forests are much less well known to the outdoor recreation community. At Park Service sites like Olympic National Park’s Hoh Rainforest or giant sequoia groves in Yosemite, Sequoia, and Kings Canyon National Parks, old-growth forests provide the basis for a recreational experience that draws high volumes of visitors each year. While similar examples do exist on USFS lands,<sup>3</sup> many areas of old-growth forests are relatively unknown and remain vulnerable to threats including insects and disease, high severity fire, and logging. By establishing a clear intent to conserve the USFS’ remaining old-growth forests, and providing tools to help land managers increase their extent, the proposed plan amendment would enhance and expand USFS’ ability to provide outstanding recreational experiences in these settings.

## **Support for Proposed Forest Plan Amendment**

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<sup>3</sup> Examples of well-known old-growth forests on NFS lands include the Joyce Kilmer Memorial Forest on the Nantahala National Forest, the Ancient Bristlecone Pine Forest on the Inyo National Forest, and the Giant Sequoia National Monument.

The proposed plan amendment generally provides strong protections for old-growth forests, while providing guidance and flexibility for land managers to implement science-based ecological restoration strategies where appropriate. We strongly support the purpose of the proposed amendment, as articulated on page 8 of the NOI:

“The proposed amendment establishes a national intent to maintain and improve amounts and distributions of old-growth forest conditions within national forest ecosystems and watersheds so that old-growth forest conditions are resilient and adaptable to stressors and likely future environments.”

This statement establishes a clear intent to conserve and restore old-growth forests at both the stand and landscape level. This statement effectively captures the spectrum of management approaches needed to conserve old-growth forests across the NFS.

We appreciate that the guidance acknowledges the social and cultural values of old-growth forests, including their recreational values. These values are articulated primarily through the Statement of Distinctive Roles and Contributions, although multiple plan components would indirectly support recreational values. We have provided more information on integrating recreation into the proposed plan component in Recommendation #2 below.

We strongly support the proposed standards, and generally find them to be effective mechanisms for protecting old-growth forests. These standards provide important sideboards to ensure that any tree cutting or other vegetation management activity that occurs in old-growth stands will occur primarily for ecological purposes and will enhance ecological integrity. We have noted several questions and concerns related to the exceptions to the proposed standards in Recommendation #5 below.

We also appreciate that the proposed plan amendment strikes a careful balance between conserving old-growth forests and encouraging science-based restoration

activities needed to build wildfire resilience in dry, frequent-fire forests. Too often, these two management goals are framed as incompatible. The proposed plan amendment appropriately considers mature and old-growth forests to be a cornerstone of fire-resilient ecosystem structure across the NFS. Fire-adapted ecosystems are acknowledged throughout the proposed plan amendment, and multiple plan components would encourage prescribed fire, cultural burning, ecological thinning, and other restoration tools needed to ensure that both old-growth and mature forests are resilient to uncharacteristic levels of high-severity wildfire. Fire-related restoration activities have pronounced benefits for outdoor recreation,<sup>4</sup> and we have provided context for how the USFS can maximize these benefits below. Similarly, we appreciate that the proposed plan amendment requires land managers to incorporate Indigenous knowledge into old-growth conservation and proactive stewardship strategies, and requires ongoing collaboration with Tribes.

Finally, we support the proposed plan components that would also apply to mature forests that do not currently meet the definitional conditions for old-growth.<sup>5</sup> Recognizing that old-growth forests are underrepresented across many areas of the NFS, and that many of these remaining old-growth stands are vulnerable to insects and disease, high severity fire, and other stressors, it is critical that the USFS consider the role that mature forests can play in increasing the “amount, representativeness, redundancy, and connectivity” of old-growth forest conditions at the landscape level.<sup>6</sup>

## **Recommendations for Improvement**

*Recommendation #1: Clarify where proposed plan components apply.*

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<sup>4</sup> Jamie Ervin, *Wildfire and Outdoor Recreation in the West: How Recreationists Can Support a Fire-Resilient Future*, Policy Report, Outdoor Alliance, Washington, D.C. (2023).

<sup>5</sup> The proposed Desired Condition #2 envisions mature forest conservation via proactive stewardship actions that increase the amount of old-growth conditions over time. The proposed Guideline also considers mature forests through conservation and proactive stewardship actions identified in an *Adaptive Strategy for Old-Growth Forest Conservation*.

<sup>6</sup> Proposed plan amendment, Desired Condition #2.

The DEIS could strengthen the proposed amendment by more clearly describing where, or under what conditions, the proposed plan components apply. As written, the proposed forest plan amendment envisions that both the *Adaptive Strategy for Old-Growth Forest Conservation* and the plan-level monitoring report will “identify criteria used to indicate conditions where plan components apply” within two years following the adoption of the national amendment.<sup>7</sup> This framework implies that the proposed plan amendment will not actually apply anywhere on the NFS for two years (or potentially longer) while land managers finalize an adaptive strategy and complete monitoring reports. It is also unclear whether adopting an adaptive strategy or finalizing a map of old-growth forests will require additional action such as NEPA analysis or a separate forest plan amendment at the individual forest level. The 2012 Planning Rule states that, with the exception of administrative changes, “a plan amendment is required to add, modify, or remove one or more plan components, or to change how or where one or more plan components apply to all or part of the plan area (including management areas or geographic areas).”<sup>8</sup>

While recognizing that designing local and regional criteria for identifying the spatial extent of old-growth forests is complex, we are concerned that this current management approach will be cumbersome for land managers and will unnecessarily delay old-growth and mature forest conservation activities. If a second plan amendment is indeed required to formalize an Adaptive Strategy, it could be many years before any of the proposed plan components apply anywhere on the NFS. Given the urgency of protecting old-growth forests in the face of climate change and other stressors, as well as the USFS’s higher-than-normal capacity to complete proactive stewardship projects using Inflation Reduction Act and Bipartisan Infrastructure Law funds in the near term, delaying the proposed old-growth conservation proposal by many years is an unacceptable outcome. Additionally, regardless of a second plan amendment, and considering the significant capacity constraints faced by the USFS, we question whether the agency will realistically be able to finalize adaptive strategies, establish a National old-growth Monitoring Network, and establish local and regional monitoring approaches within two years. We recommend simplifying this process by removing the requirement that Adaptive Strategies “[i]dentify criteria used to indicate

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<sup>7</sup> See, Proposed Management Approach 1(a) (second bullet); See also, Proposed Plan Monitoring, #1.

<sup>8</sup> 36 C.F.R. § 219.13

conditions where plan components will apply,” and instead developing these criteria in the DEIS and final plan amendment.

We also recommend removing the same language from plan component #1 under Plan-Level Monitoring to clarify that monitoring activities won’t in themselves change where the amendment applies. This will provide clearer direction for planners and land managers in the near term, and support the proposed amendment’s intent of maintaining and expanding old-growth.

*Recommendation #2: Better integrate outdoor recreation into the proposed plan amendment.*

The NOI appropriately references 36 CFR 219.10(b)(1)(i) Recreation settings, opportunities, access, and scenic character, as a substantive requirement of the 2012 Planning Rule that will govern the plan amendment process. We also suggest identifying 36 C.F.R. 219.8(b)(2) Sustainable recreation; including recreation settings, opportunities, and access; and scenic character, which describes outdoor recreation’s role in providing for social and economic sustainability. The connection between old-growth forests and social and economic sustainability is clearly articulated in E.O. 14072,<sup>9</sup> and by conserving and expanding recreational opportunities in and around old-growth forests, the proposed amendment has a clear tie to social and economic sustainability related to outdoor recreation across the NFS.

The proposed Statement of Distinctive Roles and Contributions articulates the diversity of forest conditions that comprise old-growth forests, the ecosystem services that these forests support, and their social and cultural values. Outdoor recreation is specifically referenced in the following sentence:

“Old-growth forests have place-based meanings tied to cultural heritage; local economies and ways of life; traditional and subsistence uses; aesthetic,

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<sup>9</sup> See, Exec. Order No. 14072, 87 FR 24851, Section 1 (April 22, 2022); “Many local economies thrive because of these outdoor and forest management activities, including in the sustainable forest product sector.”



spiritual, and recreational experiences; and Tribal and Indigenous histories, cultures, and practices.”

We appreciate this statement, and agree with its implication that visiting old-growth forests helps visitors establish a sense of place that (for many visitors) relates to spirituality and multiple cultural values. Outdoor recreation in old-growth settings also supports local economies. In addition to this current language, we also recommend including one or more plan components that describe old-growth forests’ value as recreational settings, including more information about scenic values and the types of recreational experiences that these forests provide. Focusing on the setting is important for helping land managers understand the unique recreation opportunities that old-growth forests provide, both to inform how old-growth forests are considered in other portions of individual forest plans (such as sustainable recreation), and to help land managers better consider old-growth recreation values at the project level. This could be accomplished through an addition to the Distinctive Roles and Contributions stating:

Old-growth forests also provide unique settings for outstanding outdoor recreation opportunities that allow visitors to appreciate and better understand the natural history of public lands. These scenic values, along with ecosystem benefits like wildlife habitat, clean air, clean water, and natural hydrologic regimes, support a distinct recreation experience that helps build a stewardship ethic among visitors to National Forests.

Additionally, the proposed plan amendment could be strengthened through the addition of a goal aimed at encouraging line officers to plan and implement old-growth conservation and proactive stewardship actions in a way that simultaneously protects and enhances the recreational experiences that these forests provide. Many aspects of the proposed plan amendment would already benefit the outdoor recreation experience in old-growth forests, but there is an opportunity for the USFS to more explicitly address recreation values through both the DEIS and proposed plan components. We recommend adding the following plan component in order to better address old-growth forests’ recreational values:

Goal: Old-growth forest conservation and proactive stewardship activities are designed to protect and enhance recreational resources, including sustainable recreation infrastructure and scenic values. Wherever possible, design proactive stewardship activities with input from recreation staff.

As an example of how these potential plan components might apply, consider the Downieville Trail Network on the Tahoe National Forest. Here, a highly popular mountain bike trail system traverses considerable areas of old-growth forests surrounding Downieville, CA.<sup>10</sup> This trail network is home to the nationally-famous Downieville Classic bike race and is a key asset to the local economy. The presence of old-growth forests contributes immeasurably to the scenic values throughout the Downieville trail network—scenic values that are unfortunately becoming rarer in the region due to the impacts of repeated high severity fires. Loss of these forests to high severity fire, logging, or other threats would harm the recreation experience and the local economy. Moreover, the area is also home to significant whitewater resources (including commercial guides) on the North Yuba, which also benefit from the clean water and scenic values provided by intact forests. In this case, old-growth conservation and restoration actions such as retention of old-growth trees, and proactive stewardship to increase forests’ resilience to high severity fire, would directly benefit the recreational resources and their associated economic benefits in the Downieville area.

*Recommendation #3: Strengthen the proposed objective to require old-growth gains in more than one landscape.*

The proposed objective states “Within ten years, at the unit level, at least one landscape prioritized within an *Adaptive Strategy for Old-Growth Forest Conservation* will exhibit measurable improvements in old-growth desired conditions as a result of retention, recruitment, and proactive stewardship activities and natural succession.” While we appreciate this objective’s intent of improving old-growth conditions, this plan component should be both strengthened and clarified.

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<sup>10</sup> For example, see mention of old-growth forests as a scenic value in the description for the Second Divide Trail, <https://www.trailforks.com/trails/second-divide/> (Accessed Feb. 1, 2024).

First, it is unclear what is intended by the qualifier “at the unit level.” This language could be read to mean individual forests, ranger districts, Adaptive Strategies, or other land management units. Further, although the 2012 Planning Rule defines the term “landscape,”<sup>11</sup> there are no geographic constraints on this definition. Because of these ambiguities, this objective does not set land managers up for success and provides very little assurance that the plan amendment’s intent of conserving old-growth forests will be met in a meaningful way.

Second, even if “at the unit level” is intended to require improvements within individual national forests, limiting this objective to “one landscape” fails to meet the proposed plan amendment’s intent to maintain and improve old-growth forest conditions. Under a more lenient interpretation, this objective could be read to allow for a forest to identify improvements in a single landscape (such as a Wilderness area) that is largely off-limits to active management, without significantly changing old-growth management outside of protected areas. This objective could be improved by clarifying the scale at which it is intended to apply, and by expanding the footprint required for measurable improvements.

*Recommendation #4: Define “proactive stewardship” and elaborate on potential stewardship strategies.*

The term “proactive stewardship” is used repeatedly throughout the proposed plan amendment but is not defined. While we generally interpret this term to encompass all active management activities that increase the amount and resiliency of old-growth forests, it is worth noting that activities that might qualify as “proactive stewardship” vary significantly throughout the country and are highly context-dependent. For example, in dry, frequent-fire forests, “proactive stewardship” might mean prescribed fire, thinning, and other fuel treatments intended to address the impacts of fire suppression. In mature northern hardwood forests, this term might mean selective tree cutting and snag creation to emulate gap-phase dynamics and build heterogeneity at the local scale. In high-elevation whitebark pine forests, proactive stewardship might involve biological treatments

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<sup>11</sup> 36 C.F.R. § 219.19 defines landscape as “A defined area irrespective of ownership or other artificial boundaries, such as a spatial mosaic of terrestrial and aquatic ecosystems, landforms, and plant communities, repeated in similar form throughout such a defined area.”

to protect trees from insects and disease. The DEIS should include a definition of this term and also include some discussion and analysis of ecosystem-appropriate proactive stewardship activities throughout the NFS.

*Recommendation #5: Strengthen the proposed standards.*

As is outlined above, we strongly support the proposed standards. We are concerned, however, by several of the proposed exceptions to these standards, particularly the exceptions for Standard 2(b)(ii) and 2(b)(v). Standard #2 states:

“Vegetation management in old-growth forest conditions must be for the purpose of proactive stewardship, to promote the composition, structure, pattern, or ecological processes necessary for the old-growth forest conditions to be resilient and adaptable to stressors and likely future environments.”

We support this standard, which (along with Standard #3) places strong ecological sideboards on vegetation management projects in old-growth stands. However, we seek additional clarity on two of the proposed exceptions proposed in Standard 2(b).

Standard 2(b)(ii) provides an exception for actions necessary to “protect public safety.” While we agree with the intent of this standard—to provide land managers with flexibility to address a legitimate public safety concern—the DEIS should elaborate on what might constitute a public safety concern related to vegetation management. A wide range of land management actions could potentially be interpreted as “necessary to protect public safety,” and Exception 2(b)(i) already provides for addressing hazardous fuels in the wildland-urban interface. This exception should be made more specific and described more explicitly in the DEIS.

Standard 2(b)(v) provides an exception “in cases where it is determined that the direction in this amendment is not relevant or beneficial to a particular forest ecosystem type.” This exception is confusing given that the mature and old-growth

technical report is designed to capture the full spectrum of forest ecosystems.<sup>12</sup> Considering that the proposed plan amendment already charges land managers with identifying where the proposed plan amendments apply, it is difficult to foresee a scenario where a land manager might determine that—within these pre-identified areas—a restoration project or other vegetation management action might not be appropriate for a particular ecosystem type. We recommend that this exception be removed from the proposed plan amendment.

*Recommendation #6: Consider the USFS' capacity to implement the proposed plan amendment.*

The proposed plan amendment requires ongoing action from both Forest Service staff and partners to finalize, implement, and monitor old-growth conservation strategies, without providing any funding for implementation. Due to chronic underfunding of non-fire programs at the USFS, we anticipate that the agency will face significant capacity constraints in implementing the proposed amendment, particularly completing the *Adaptive Strategy for Old-Growth Forest Conservation* and standing up a National Old-Growth Monitoring Network. While we strongly support both of these planning approaches, we recommend that the DEIS analyze the agency's capacity to implement the proposed plan amendment, as written, and also consider an alternative that achieves the proposed plan amendment's intent while reducing the implementation burden on USFS staff. Among other things, the DEIS could consider how resources like the new USFS Planning Service Organization might support implementation of the proposed plan amendment.

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Thank you for considering our community's input and thank you for your work to craft the proposed plan amendment. We look forward to continued collaboration with the USFS to protect old-growth and mature forests for their outstanding ecological, cultural, and recreational values.

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<sup>12</sup> U.S. Department of Agriculture, Forest Service, FS-1215a, *Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management* (2023).



Best regards,

A handwritten signature in black ink that reads "Jamie Ervin".

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Senior Policy Manager  
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A handwritten signature in black ink that reads "Shoren Brown".

Shoren Brown  
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TOGETHER WE ARE A FORCE™



## Our Organizations

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

The Conservation Alliance is an organization of like-minded businesses whose collective contributions support grassroots environmental organizations and their efforts to protect wild places where outdoor enthusiasts recreate. Alliance funds have played a key role in protecting rivers, trails, wildlands and climbing areas. Membership in the Alliance is open to all companies who care about protecting our most threatened wild places for habitat and outdoor recreation. Since its inception in 1989, The Conservation Alliance has contributed more than \$21 million, helped to protect more than 51 million acres of wildlands; protect 3,107 miles of rivers; stop or remove 34 dams; designate five marine reserves; and purchase 14 climbing areas. For complete information on The Conservation Alliance, see [www.conservationalliance.com](http://www.conservationalliance.com).

Based in Boulder, Colorado, with offices in Washington, D.C., Outdoor Industry Association (OIA) is a catalyst for meaningful change. A member-based collective, OIA is a passionate group of business leaders, climate experts, policy makers, and outdoor enthusiasts committed to sustainable economic growth and climate positivity while protecting—and growing access to—the benefits of the outdoors for everyone. For more than 30 years, OIA has catalyzed a thriving outdoor industry by supporting the success of every member company across four critically aligned areas: market research, sustainability, government affairs, and inclusive participation. OIA delivers success for its members through education, events, and business services in the form of solutions and strategies, consultation, collaboration, and opportunities for collective action. For more information, visit [outdoorindustry.org](http://outdoorindustry.org).