

OUTDOOR ALLIANCE

December 1, 2021

Sen. Joe Manchin
Chair, Committee on Energy and Natural Resources
306 Hart Senate Office Building
Washington, DC 20510

Sen. John Barrasso
Ranking Member, Committee on Energy and Natural Resources
307 Dirksen Senate Office Building
Washington, DC 20510

Re: December 2nd Full Committee Hearing to Consider Legislation

Dear Chair Manchin and Ranking Member Barrasso:

Thank you for holding this hearing to consider a number of bills of particular significance for the human powered outdoor recreation community. The hearing comprises a long list of powerful ideas that have the potential to significantly improve recreation access and management, and we are grateful to the committee for its attention to these issues.

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.

S. 1229, the Simplifying Outdoor Access for Recreation (SOAR) Act

For many people, facilitated outdoor experiences provide a first exposure to outdoor recreation and the natural world. These opportunities allow new participants to experience outdoor recreation activities in a safe environment that allows for skill building and helps participants become more conscientious visitors



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to sensitive landscapes. These experiences are also essential for helping to connect communities that have historically been deprived of these opportunities with their public lands and waters.

The ability for facilitated access providers to offer these experiences is dependent, however, on a challenging and dated system for special use permitting for public lands activities. The SOAR Act will improve the recreational permitting systems so more people can experience public lands through volunteer-based clubs or with an outfitter, guide, nonprofit outdoor leadership organization, or university outdoor program. It will also support the recreation economy, small businesses, and rural communities by making it easier for guides and outfitters to take people outdoors.

We strongly support this bill, which reflects years of thoughtful input from facilitated access providers, conservation organizations, and others.

S. 1269, the Environmental Justice in Recreation Permitting Act

Outdoor Alliance strongly supports the Environmental Justice in Recreation Permitting Act.

Our organizations represent participants in outdoor adventure activities, and these activities contribute substantially to participants' happiness and even identity. Many of our modes of recreation are technical—even esoteric—and tend to be less accessible than ball sports at a neighborhood park, or even something like skateboarding. In general, outdoor pursuits tend to require relatively expensive equipment; all require a degree of free time and technical knowledge.

A great many people who have had the opportunity to explore and pursue activities like kayaking, climbing, or skiing had the door opened by a family member familiar with the pursuit. However, due to our country's history of racial discrimination, which includes intentionally excluding numerous communities from various geographic and social settings, these opportunities have never been equitably distributed. This fraught history makes it more challenging for young people of color—regardless of whether they have the time, interest or resources—to find the same opportunities to explore and engage in outdoor pursuits.



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Facilitated access providers operating on public lands and waters through special use permits are a valuable on-ramp for new participants to active outdoor recreation. They can help impart the skills that can lead to a lifetime of meaningful experience in the outdoors. Given the particular importance of building these pathways for members of environmental justice communities, we strongly support studying the ways in which recreational special use permits contribute—and can better contribute—to facilitating more equitable access to the outdoors.

S. 1616, the Federal Interior Land Media Act

Outdoor Alliance is concerned by the breadth of the proposals in the FILM Act. Given the advent of social media and media monetization opportunities that blur the distinction between commercial and noncommercial activities, we recognize that there may be a need to update commercial filming permit requirements. We are also aware, however, of significant incidents of bad behavior by production crews on public lands, including limbing trees to facilitate drone flights and trampling sensitive areas to get access to better sight lines for shots. Given the potential impacts of these uses, permitting requirements are an important opportunity for land managers to educate production crews about their responsibilities, as well as to establish a point of responsibility should misbehavior occur. Additionally, given improvements in technology, 10 people constitutes a significant production presence, and we believe that the goals of the Act could be met with a lower cap on crew size. This seems equitable, as well, given that similarly sized facilitated recreation groups would likely require a permit at the same location.

S. 1874, the Recreation Not Red-Tape Act

Opportunities for outdoor recreation on our country's public lands and waters benefit Americans' quality of life and foster a connection to place and a stewardship ethic. They also support a thriving outdoor recreation economy, accounting for nearly 2 percent of U.S. GDP in 2020, despite the industry being exceptionally hard hit by the COVID-19 pandemic and related economic downturn. Our country's public lands are the birthright of every American, and outdoor recreation is the most common way for Americans to come to know their public lands.



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Over the past 50 years, our country has made tremendous strides in establishing protections for iconic places on our public lands and preserving landscapes for their intrinsic value, and establishing additional protections through tools like the Wilderness Act will continue to benefit outdoor recreation and conservation. However, even as we pursue these protections—as well as development activities on public lands and waters—the gap between public lands managed for Wilderness character and public lands managed as multiple use has left some of our most important recreation-rich landscapes lacking in appropriate management or protection. Unquestionably, there are places on the public lands—particularly those close to towns or cities—where management should prioritize sustainable recreation use in a healthy and protected landscape.

Similarly, land managers are currently and appropriately responsible for stewardship of the resources under their charge, and simultaneously accountable for performance metrics related to development activity (for example, the number of board feet produced from a National Forest System unit). Many land management agencies, however, lack a recreation mission component, and land managers are not evaluated based on their success in meeting objectives around the quality of the recreation experience.

This dynamic—and the historic tension between conservation and development—has left outdoor recreation at times unnecessarily neglected, and there are substantial opportunities to improve access to recreation opportunities, the quality of the recreational experience, and the attendant benefits, both economic and more personal.

The Recreation Not Red-Tape Act (RNR) will help to ensure that outdoor recreation is given appropriate consideration by land managers. This, in turn, will help more Americans to have access to quality recreation experiences and support economic diversification and resiliency for our country's public lands communities.

We strongly support provisions in RNR that:

- Add recreation to the mission of important land management agencies, including the Corps of Engineers, the Bureau of Reclamation, FERC, and the Department of Transportation;



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- Improve access to outdoor recreation programs for service members and veterans;
- Extend seasonal recreation opportunities where appropriate;
- Improve the availability of recreation passes and facilitate their online sale; and
- Help land managers accept volunteers to conduct stewardship activities, and facilitate trail maintenance across agency jurisdictions.

Additionally, our organizations have had significant positive experience in working with many of the recently-formed state offices of outdoor recreation and believe that they make a valuable contribution towards, among other benefits, better coordination between states and federal land managers in support of recreation goals. We appreciate the bill's statement of support for the role of these offices.

We also greatly appreciate the inclusion of the SOAR Act within RNR to make needed improvements to the special use permitting process, which we discuss in greater detail above.

Further, we strongly support the goal of directing land management agencies to develop performance metrics to support progress towards recreation objectives. We believe that the metrics described in § 302(b)(2) should be modified, however, to make clear that visitation volume is not the measure of success, but rather the quality of the visitor experience and the accessibility of high-quality opportunities. Further, we strongly support the addition of metrics focused on progress towards enhancing access for underserved communities to high-quality recreation resources and experiences.

Most importantly, the outdoor recreation community strongly supports the bill's provision to help identify and protect important areas for outdoor recreation through a National Recreation Area System.

As noted above, our country has developed a system of protected public lands that serves as a model for much of the world. Our focus on the most iconic and pristine backcountry areas, however, can sometimes leave close-to-town, accessible, frontcountry areas—which can be some of the most important places for recreation—exposed to inappropriate development pressure or leave recreationally significant areas subject to less than ideal management.



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Currently, when land managers conduct planning activities like Forest Planning for National Forests or Resource Management Plan development for BLM units, they are appropriately required to inventory for areas that could become new Wilderness or Wild and Scenic River designations. While these inventories and designations are absolutely essential, right now there is no analogous land-use designation process specifically dedicated to assisting Congress in evaluating, protecting, and enhancing outdoor recreation opportunities. RNR instructs land managers, during their existing planning processes, to inventory for places of recreational significance, just as they currently are required to inventory for potential new Wilderness or Wild and Scenic Rivers designations. This process will assist Congress in developing new National Recreation Area designations and help to ensure that management plans appropriately account for recreation.

This change will facilitate greater access to sustainable recreation in healthy, ecologically sound surroundings for more Americans, including those living in a diversity of geographic settings, from rural to urban. This process will make sure recreationally significant areas on public lands are given the management attention they deserve, benefitting public lands communities and the businesses supported by the outdoor recreation economy. More Americans will have better access to high quality settings for activities like mountain biking, climbing, skiing, paddling, and hunting and angling in close-to-home settings.

S. 2258, the Parks, Jobs, and Equity Act

Regional and local parks and green spaces are essential community infrastructure. These places support mental and physical health benefits, have the ability to introduce individuals to recreation opportunities, and during the COVID-19 pandemic, have offered Americans a space for fresh air, exercise, and a place for communities to safely gather. While parks have seen increased use over the past several years, many are reporting budget cuts and are being forced to cut paid programming and fee-based amenities, as well as to layoff or furlough employees.¹ The Parks, Jobs, and Equity Act (PJEA) will implement a one-time investment that will efficiently provide emergency funding for local parks across the country. This will create and preserve jobs, assist in revitalizing communities hurt by COVID-19, and

¹ <https://www.nrpa.org/blog/nrpa-parks-snapshot-may-6-may-8-survey-results/>



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fund new, or upgrade existing, local parks. While this program shares similarities with the bipartisan Outdoor Recreation Legacy Program which provides funding for parks in underserved communities across the country, the PJEA program uses a formula offering state and local control to ensure investments are made quickly and can offer a direct response to local community priorities and direct resources to the communities most heavily affected by COVID-19. We strongly support this investment in America's regional and local parks and green spaces.

S. 2887, the Outdoors For All Act

Outdoor recreation is the most common way in which Americans come to know their public lands and waters and develop a stewardship ethic. Recreation activities help provide a connection to place; personal and health benefits; community connection; and vibrant economies. Too many Americans, however, lack ready access to these opportunities. The Outdoors for All Act would create a dedicated funding source for the Outdoor Recreation Legacy Partnership (ORLP) grant program to improve access to outdoor recreation opportunities in underserved communities, and we strongly support this bill.

S. 3264, Biking on Long-Distance Trails Act

Outdoor Alliance supports this bipartisan legislation, an important element to enhancing outdoor recreation infrastructure. Trail use, including mountain biking, has grown over the last decade, most notably during the pandemic. By providing opportunities for trail users, we can create pathways to positive physical and mental health, and this legislation supports these goals.

The Biking on Long-Distance Trails (BOLT) Act will direct federal land managers within the Department of Interior, and USDA Forest Service to 1) identify no fewer than 10 existing long-distance bike trails not shorter than 80 miles; 2) identify not fewer than 10 opportunities to develop or complete long-distance trails not less than 80 miles; 3) create maps, signage, and promotional materials for long-distance trails; and 4) issue a progress report no later than 2 years after enactment. We appreciate the bill's attention to these special opportunities and resources.



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S. 3266, the Outdoor Recreation Act

Outdoor Alliance greatly appreciates the attention of the Outdoor Recreation Act to numerous issues of significance for the human-powered outdoor recreation community. Our specific feedback on individual bill sections follows.

Sec. 101. Permit relief.

Outdoor Alliance appreciates attention to improving the permitting processes of the federal land management agencies. We share this interest, which is why we strongly support the permitting improvements included in the Simplifying Outdoor Access for Recreation Act. We believe § 101 of the Outdoor Recreation Act can be complementary to the permitting improvements in the SOAR Act, but several targeted changes are needed. Our recommendations to improve the Outdoor Recreation Act are described below.

With regard to § 101(b), which waives the permit requirement to access an existing picnic area for outfitters and guides serving fewer than 40 clients, we recommend that one component of this subsection be expanded and another component be clarified:

- First, the waiver of the permit requirement for picnic areas should be expanded to include youth groups as well as guides and outfitters. It makes sense for this waiver to be available to youth groups, particularly since youth groups are much more likely to use picnic areas on federal public lands than guides and outfitters.
- Second, we believe it is necessary to clarify this section by specifying what exactly is intended by serving fewer than 40 clients. Without clarification, § 101(b) could be interpreted to allow an outfitter, guide, or youth group to bring 40 clients per day to a picnic area. This could result in significant user conflict and unacceptable adverse resource effects. We recommend that the permit waiver be limited to a level of use that is unlikely to have significant impacts, such as capping the waiver so that it allows an outdoor leader to serve 40 clients per year (40 service days) at any given picnic area.

Section 101(c) requires the agencies to conduct a study on access to federal lands and permits for youth groups. While we strongly support the intent of this section,



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we believe it should be expanded to include outfitters and guides as well as youth groups. Since both youth groups and outfitters and guides access the permitting systems of federal land management agencies, they both experience similar barriers and impediments to accessing public lands. The benefit and utility of such a study would be greater if all users of the federal permitting systems are included.

These changes will bring balance and equity to § 101 of the Outdoor Recreation Act by making it applicable to all entities that serve the public in the outdoors and help ensure that all segments of the population will be provided with opportunities to recreate on their public lands.

Sec. 102. Planning and managing for recreation.

Outdoor Alliance strongly supports and appreciates § 102 and its attention to the need to identify, appropriately manage, and protect high-quality recreation resources on federal public land and to do so through public outreach. Too often, management agencies are lacking in basic information concerning invaluable recreational resources and opportunities under their jurisdiction. Requiring the development of this information during planning will help to focus agency efforts and ensure that recreation is a priority during planning processes.

Additionally, we greatly appreciate the attention to quality opportunities and the focus on planning for future use. We request that—to ensure that the focus stays on increasing the availability of high-quality opportunities rather than volume of use—§ 102(d)(1)(B) be amended to strike the word “underutilized” and § 102(d)(1)(C) be removed.

Importantly, § 102(d) is a key opportunity to guide land managers toward improving their delivery of recreation opportunities to historically underserved communities. We strongly support amending § 102(d)(1)(A) to read, “consider future recreation needs and the need to provide improved recreation access for historically underserved communities.”

Sec. 103. Forest Service climbing guidance.

Rock climbing on America’s public lands is increasing in popularity. The Outdoor Industry Association estimates that more than 7 million people climb outside. There



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are more than 500 indoor climbing gyms in the United States, and a 2019 Climbing Wall Association survey indicates that 60% of climbing gym customers intend to rock climb outside. The USDA Forest Service manages more than 30 percent of America's climbing areas, which amounts to approximately 10,000 cliffs, boulders, and peaks.

To date, the Forest Service has not complied with the mandate to issue climbing directives within 180 days of the passage of the 2021 appropriations bill.² National-level Forest Service climbing management directives (that allow for site-specific nuance and unique resource requirements) will provide much needed assistance to local Forest Service land managers. The Forest Service is currently working on multiple climbing management plans,³ but without national-level guidance, the plans lack uniformity, are unnecessarily expensive to develop, and are more apt to fail. For example, in November 2021, the Bighorn National Forest abandoned an expensive two-year effort to develop a climbing management plan⁴ due to staffing shortages, local controversy, and lack of direction from the national Forest Service office. The Bighorn Forest is now left with interim climbing restrictions that were intended to be a temporary stopgap while the climbing management plan was completed.

Outdoor Alliance agrees that § 103 is a step in the right direction because it requires the Forest Service to issue national-level guidance that legitimizes climbing on Forest Service lands and allows for appropriate use of standard climbing equipment. Forest Service climbing management guidance will clearly save taxpayer dollars, avoid confusion, streamline recreation management, and provide certainty to rural communities that depend on climbing and outdoor recreation for economic development.

Sec. 104. Target shooting ranges.

We support designated shooting ranges on public land, as unmanaged and unregulated target shooting on public lands is a safety hazard in many locations across the United States. Designated areas for this activity would improve public

² <https://docs.house.gov/billsthisweek/20201221/BILLS-116RCP68-JES-DIVISION-G.pdf>

³ For example: Bitterroot National Forest, Bighorn National Forest, Pisgah and Nantahala National Forests, and Monongahela National Forest.

⁴ <https://gearjunkie.com/news/ten-sleep-climbing-management-plan-suspended>



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safety and reduce impacts to public lands. We are concerned, however, with the restrictions that would be imposed under § 104(c)(2) of this legislation that would prevent closing areas of Federal land to shooting unless a designated shooting range is made available. Such closures have been necessary to protect National Forest lands and ensure public safety, particularly in high-use recreation areas in close proximity to urban areas.⁵ Additionally, we would strongly support the addition of provisions to require planning for shooting area cleanup, including lead removal.

Sec. 201. Broadband internet connectivity at recreation sites.

Given the broad range of deferred maintenance and other infrastructure needs—including improved internet connectivity for rural gateway communities—we believe that the resources expenditures envisioned by this section could be more effectively directed.

Sec. 202. Federal land and aquatic resource activities assistance.

We support the provisions of § 202 to authorize the Secretary to inspect and decontaminate watercraft within a river basin that contains a Bureau of Reclamation Water Project, enter into partnerships to provide technical assistance, and establish a grant program for watercraft inspection and decontamination stations. We appreciate language in the legislation directing the Secretary to minimize disruptions to public access for boating and recreation in non-contaminated watercraft.

Sec. 203. Improved recreation visitation data.

Outdoor Alliance appreciates the recognition that improved recreation visitation data is needed across federal land management agencies and strongly supports § 203. Outdoor recreation is a large and growing part of our economy as described in the recent Outdoor Recreation Economy Report by the Bureau of Economic

⁵ An example is Closure Order 06-05-05-11-01 on the Mt. Baker-Snoqualmie National Forest that closed areas within the Middle Fork Snoqualmie and South Fork Snoqualmie River corridors to recreational shooting that are located within close proximity to the greater Seattle metro area.



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Analysis.⁶ Less clear, however, is how much recreation is happening, where it is happening, and what types of recreation are being pursued, and these pieces of information are key to informed decision-making by land managers. The COVID-19 pandemic has highlighted the importance of recreation opportunities close to home, as parks and trailheads have seen a large jump in use.⁷ As the demands for recreation increase and new types of use emerge, the entities managing federal lands and recreation need robust, modern strategies to capture dispersed recreation across large tracts of land.⁸

The National Visitor Use Monitoring (NVUM) program, managed by the USDA Forest Service to assess visitor use and visitor satisfaction across forest units, is due for an update. The limited survey periods conducted by the NVUM program do not adequately capture visitor use regarding seasonality, types of uses, new emerging uses, and volume. Moreover, some recreational activities (e.g., rock climbing) do not have protocols for data collection within the NVUM system. We strongly support the push through the Outdoor Recreation Act to support land management agencies in expanding upon NVUM protocols and developing more robust recreation visitation data.

Given the importance of recreation opportunities on areas managed by the U.S. Army Corps of Engineers, we encourage the addition of that agency to the list of responsible officials in § 203(a).

Sec. 204. Travel management.

We are very much in support of making appropriate travel management planning for motorized vehicle use on federal land a priority, including the subsequent development of practical motor vehicle and over-snow vehicle use maps for the benefit of the recreating public. However, we have significant concerns about this section as written.

⁶ U.S. Department of Commerce, Bureau of Economic Analysis. (2020). Outdoor Recreation Satellite Account, U.S. and States, 2020. Retrieved from <https://www.bea.gov/data/special-topics/outdoor-recreation>.

⁷ Geng D, Innes J, Wu W, & Wang G. (2020). Impacts of COVID-19 pandemic on urban park visitation: a global analysis. *Journal of Forestry Research*, (2020). Retrieved from <https://doi.org/10.1007/s11676-020-01249-w>.

⁸ Headwaters Economics (2021). Innovative new ways to count outdoor recreation. Retrieved from <https://headwaterseconomics.org/outdoor-recreation/counting-outdoor-recreation>.



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Meaningful travel management—the determination of an appropriate and sustainable network of roads, trails, and areas for motor vehicle use on public lands in all seasons—has been a goal of federal land management agencies since at least the early 1970s. Motorized travel is an important and legitimate use on public lands, both for public access and for recreation. But as motorized recreational use has increased over the years—and as the technological capability of off-road and over-snow vehicles has improved—so too have impacts increased to natural resources, wildlife, and other, non-motorized, uses of the same public lands. The need for effective management based on appropriate planning has never been more urgent than it is today.

In 1972, President Nixon issued Executive Order 11644, the purpose of which was “to establish policies and provide for procedures that will ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands.” And yet, more than three decades later, in 2005, then Chief of the Forest Service Dale Bosworth (under President George W. Bush) was still citing unmanaged motorized recreation as one of the “four threats to the health of the nation’s forests and grasslands” (along with fire and fuels, invasive species, and loss of open space—three other significant issues that land management agencies have not yet managed to get a handle on).

Today’s dirt bikes, e-bikes, side-by-sides (UTVs), snowmobiles, and timber sleds are more popular and more technically capable by orders of magnitude than their counterparts from twenty years ago. Meanwhile, despite robust regulations and guidance for travel management planning issued by the Departments of Agriculture (viz. 2005 USFS Travel Management Rule and 2015 OSV Rule; 36 CFR Parts 212, 251, 261, and 295; USFS Travel Management Handbook) and Interior (43 CFR part 8340; 2016 Revised BLM Travel and Transportation Handbook), federal land management agencies have generally failed to make travel management a priority, or to adequately apply and address the required minimization criteria. As a result, we have seen, across the public landscape, a proliferation of user-created roads and trails, increased erosion and other resource damage, increased fragmentation of wildlife habitat, and increased conflicts with greater numbers of non-motorized recreationists in all seasons.



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Our fundamental concern with this section as a whole is that it will override an entire body of existing regulations rather than make effective travel management planning a priority. Specifically, we have deep concerns with the following provisions, which require amendment or removal:

- § 204(a)(1) seems to suggest, incorrectly, that non-motorized recreation (including hiking, traditional (non-motor-assisted) mountain biking, whitewater paddling, backcountry ski and snowshoe touring, and rock climbing) is subject to travel management planning and might therefore be confined to designated areas or routes;
- § 204(b)(1) language, (“may use an existing evaluation or designation”) suggests that underlying regulations and minimization criteria could be circumvented entirely at the discretion of the Secretaries;
- § 204(b)(3)(D) suggests that the consideration of legally-required elements of the minimization criteria such as “minimization of impacts to wildlife, and other appropriate criteria” would be left to the discretion of the Secretaries based on considerations at the local level;
- § 204(b)(4)(A) language stating that decisions, “shall increase—multiple use recreation opportunities,” would contravene the purpose and legal underpinning of travel management planning: to determine a system of roads, trails, and areas for motor vehicle use on public lands that can be reasonably and safely maintained within agency budgets and staffing levels; that is sustainable for the long-term environmental integrity of those lands; and that minimizes impacts of motorized travel on natural resources, wildlife, or other recreational uses. These planning considerations may in certain cases necessarily *decrease* the overall acreage or mileage of motorized recreation opportunities. We suggest that the emphasis here be shifted instead to require that the Secretary concerned “shall *improve*—multiple use recreation opportunities,” thereby prioritizing (above total number of acres or miles) such considerations as sustainable maintenance, signage, safety, connectivity (as appropriate), congestion, the provision of adequate parking and staging areas, enforcement of existing laws and regulations, and the minimization of conflict between different uses;
- § 204(c). We ask the committee to remove the “Rulemaking” provision allowing that “[t]he Secretaries concerned may revise existing regulations to implement this section.” This provision suggests, contrary to what we hope is the spirit of this section, that land management agencies could, at their



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discretion, override an important body of existing regulations and guidance rather than prioritize effective and appropriate travel management planning under existing law.

Sec. 301. Gateway communities.

Outdoor Alliance supports these investments in gateway communities, which will help these communities capitalize on their proximity to recreation amenities in building local economies.

Sec. 302. Forest Service conservation finance partnerships.

Outdoor Alliance supports this section and its embrace of new, successful models for the development of community-supported outdoor recreation infrastructure opportunities.

Sec. 303. Availability of Federal land infrastructure during shoulder seasons.

Many of the activities our members enjoy occur outside of the traditional summer recreation season when many recreational facilities are closed; too often we encounter gated campgrounds and locked bathrooms. Whether it's enjoying whitewater boating opportunities in the late autumn, backcountry skiing in the winter, or climbing during the first warm days in the spring, our members tend to be four-season recreationists. In addition to coordinating with outdoor recreation-related businesses and local governments, there are opportunities to also coordinate with organizations that represent user groups who engage in outdoor recreation opportunities on public lands during shoulder seasons. We request that non-profit organizations be added to the list of coordinating entities in § 303(a).

Sec. 304. Public-private partnerships to modernize campgrounds on Federal land.

Outdoor Alliance is concerned by § 304. In general, our community strongly prefers that land management agencies be adequately funded to maintain public campgrounds and opposes efforts to *de facto* privatize these resources. Additionally, we are concerned by the potential of these efforts to displace public lands visitors who prefer a less developed experience, as well as the potential for these changes to increase costs and undercut efforts to make public lands



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accessible to everyone. We believe it would also be prudent for land managers to be instructed to consider the effect on adjacent resources (including areas popular or potentially popular for dispersed camping) as users who do not prefer, or cannot afford, these developed options are displaced. We request that the scale of this proposal be reduced to one unit of the National Forest Service and one unit of BLM land.

* * *

Outdoor Alliance appreciates the committee's attention to the bills considered in this hearing, and we look forward to continuing to work with you.

Best regards,



Louis Geltman
Policy Director
Outdoor Alliance

cc: Adam Cramer, Chief Executive Officer, Outdoor Alliance
Chris Winter, Executive Director, Access Fund
Beth Spilman, Executive Director, American Canoe Association
Mark Singleton, Executive Director, American Whitewater
Kent McNeill, CEO, International Mountain Bicycling Association
Todd Walton, Executive Director, Winter Wildlands Alliance
Tom Vogl, Chief Executive Officer, The Mountaineers
Mitsu Iwasaki, Chief Executive Officer, American Alpine Club
Sarah Bradham, Interim Executive Director, the Mazamas
Keegan Young, Executive Director, Colorado Mountain Club
Chad Nelson, Chief Executive Officer, Surfrider Foundation

