

# OUTDOOR ALLIANCE CALIFORNIA

July 18, 2023

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Via email: [Californianature@resources.ca.gov](mailto:Californianature@resources.ca.gov)

Re: Outdoor Alliance California Outdoors for All – Public Comment

Dear Deputy Secretary Toy,

Thank you for the opportunity to comment on the Outdoors for All Strategy. Outdoor Alliance California and its member organizations—Access Fund, American Whitewater, California Mountain Biking Coalition (CAMTB), International Mountain Bicycling Association (IMBA), Surfrider Foundation, and Winter Wildlands Alliance. Our coalition represents tens of thousands of human-powered recreationists across the state of California: climbers, paddlers, surfers, mountain bikers, and skiers working together to achieve robust land protections, equitable access to outdoor recreation, nature-based climate solutions, shared stewardship, and sustainable recreation management on public lands and waters.

## I. Key Takeaways for the Outdoors for All Strategy

The Outdoors for All draft strategy (hereafter, the “Strategy”) is a great first step in the broader effort to fulfill the Governor’s commitment to expand equitable access to nature’s benefits. Overall we strongly support the strategies outlined in the document. We appreciate the Strategy’s explicit recognition of the need for cross jurisdiction collaboration at the local and region level. We also greatly appreciate the core commitments to justice, equity, diversity and inclusion, to improving partnerships with California Native American tribes, and to protecting economic prosperity. Our goal with these comments is to highlight the synergies between some of the high-level strategies in Outdoors for All, and to articulate additional actions that the state can take to improve sustainable recreation management and planning on both state and federal public lands and waters. We have also



included a brief but illustrative list of specific recreation access and conservation projects of the sort that we believe the state should engage with and prioritize as part of its broader 30x30 strategy (see Appendix A).

## II. CA 30x30 and Outdoors for All Strategy

Executive Order N-82-20 directs CNRA to “advance equity and opportunity for all regions of California.” We are pleased to see that CA 30x30 and the Outdoors for All Initiative are aligned in advancing equitable access to the outdoors. This alignment is exemplified by the Outdoors for All Draft Strategy document, which includes tangible commitments, goals, and strategies that would advance justice, equity, diversity, and inclusion in alignment with the 30x30 process.

The outdoor recreation community is made up of individuals for whom time spent in the outdoors has been formative and meaningful. Far too many people and communities in our country have been historically excluded from these opportunities and lack safe, quality opportunities for recreation close to home. Systemic racism, particularly around access to the outdoors and the sometimes violent and racist history of public lands, has excluded Black, Indigenous, and communities of color from many of the benefits of public lands. We strongly support an inclusive approach to CA 30x30 and Outdoors for All Initiative to ensure that implementation decisions are not just made equitably and inclusively, but support direct benefits to communities that have been denied or lack ready access to the outdoors. This approach is just, and will also help to build the broad support necessary for CA 30x30’s success.

## III. Potential Additions to the Strategy

We respectfully offer the following suggestions for additional themes and strategies to support the goal of outdoors for all in California. These ideas build off of the existing strategy and are intended to capture a broader range of recreational activities in California’s outdoors, as well as access and environmental issues related to these activities.

### *Acknowledge Human-Powered Outdoor Recreation*

The narrative and recommendations throughout much of the draft strategy emphasize outdoor activities like visiting urban parks, swimming, or nature walks that require a minimal level of expertise and equipment to be enjoyed safely. We agree that overcoming this most basic barrier to outdoor recreation—the ability to visit outdoor spaces at all—should be the primary focus of the Strategy. However, we also see a benefit to explicitly addressing activities like whitewater paddling,



climbing, surfing, backcountry skiing, mountain biking, mountaineering, and others that require a higher level of expertise for safe recreation. California is home to multiple nationally and globally significant recreation destinations for each of these activities, and for some, such as surfing on the California coast, state lands serve as critical access points that enable millions of visitors to enjoy these activities each year. For many in the human-powered outdoor recreation community, these recreational pursuits become lifelong passions that help participants maintain a healthy lifestyle, and also develop a land stewardship ethic to care for our public lands over time. The Strategy could more explicitly address human-powered outdoor recreation by including additional strategies around outdoor mentorship, by encouraging access and conservation of unique or rare recreation resources like climbing areas, by committing to working with local trails and recreation advocacy organizations, and more.

### *Outdoor Access for Rural Communities*

Much of the Strategy focuses on making outdoor spaces accessible to those living in California's urban areas, particularly areas classified as park-poor. We agree that access to nature for urban residents is extremely important, however, we also see a need to more specifically consider how to expand outdoor access in the state's rural areas. Although many of California's rural communities have easy access to high quality outdoor recreation, this is not the case everywhere, and many rural residents face barriers to access such as transportation, mentorship, and equipment, as well as environmental barriers like degraded trails. For example, many rural communities in the Central Valley lack access to safe, welcoming outdoor spaces, and many residents lack the resources necessary to travel to nearby public lands such as those in the Sierra Nevada foothills. We recommend adding one or more strategies aimed at addressing barriers specifically for rural communities. We also recommend that the Strategy identify any funding sources available to support recreation access projects in rural communities that may not be available to California's urban areas.

### *Emphasize the High Recreational Value of California's River Systems*

California's rivers provide a multitude of high-quality outdoor recreation opportunities, and often serve as recreationists' first exposure to the outdoors. With climate change bringing hotter temperatures, rivers are becoming a refuge, a haven from excessive heat for both communities and wildlife. Investments in the stewardship of California's river corridors, combined with policies aimed at ensuring their protection and public safety provide some of the state's best opportunities for advancing equitable access to nature. Many of California's rivers currently see very high levels of recreational use in the warmer months. Some, such as the Kings River



outside of Fresno, provide outstanding recreational opportunities for low income and disadvantaged populations who may not have the resources to travel a further distance to recreate outdoors. Because of these pronounced benefits for equitable access, we recommend that the Strategy explicitly reference the high recreational values of California’s river corridors and consider how state-level policies and investments might be used to improve the quality, enhance public safety programs and quantify these recreational opportunities throughout California.

*State of California’s Role in Providing Access to Federal Lands and Waters*

Although the vast majority of public lands in California are managed by federal agencies, state-managed lands often serve as a critical entry point for recreational visitors to access recreation destinations on federal land. For example, South Yuba State Park provides access to high-quality fishing, swimming, and boating on BLM lands adjacent to the South Yuba River. These state-managed access points serve as a gateway to the outdoor experience for thousands of visitors each year, creating an opportunity for the state to make the entry point to federal lands more accessible and welcoming to a broader portion of the population. This opportunity is especially important considering the ongoing staffing and capacity issues faced by federal agencies. The strategy should consider how state investments might be used to improve the recreational experience on federal lands, such as by improving trails, parking, and other infrastructure on state-managed lands..

*Seek opportunities for more developed recreational infrastructure on working and recovering lands*

We appreciate the inclusion of California’s Natural and Working Lands Climate Smart Strategy document in Strategy 1.8.3. Working lands present an excellent but underutilized opportunity to provide more outdoor recreation infrastructure, especially in rural areas. Many rural towns are surrounded by private forests that are inaccessible because of a lack of trails or other recreational infrastructure or restrictive landowners. There are several examples of working forests that have entered into agreements with local nonprofits to build and maintain trails.

Working forests are an ideal opportunity in that their forested lands spend fifteen to thirty years growing before the lumber is harvested. By entering into a partnership and access agreement with a local nonprofit or local government agency, private landowners can provide increased recreational opportunities and improve their reputation and standing in their local communities. There may also be lease agreements or financial arrangements through which the landowner can diversify their income stream.



There are some excellent examples of this type of arrangement already in place. The city of Tehachapi, California, entered into an access agreement with a local mining company. The mining company owns a large swath of land abutting the city. The company owns several thousand acres of land that they don't see as economically feasible to mine at this time. The mining company, the city, and a local trail stewardship organization entered into an agreement to build public hiking and biking trails on the mining company property. Since entering into that agreement ten years ago, the local nonprofit has built over 30 miles of new trails. The trails now serve as an economic driver for the town, attracting high school mountain biking race events, and local trail tourism. It has also dramatically increased outdoor recreation opportunities for the people of Tehachapi and improved the quality of life for that community.

Another example of working lands providing recreational access is the working forest owned by the Mendocino Redwood Company just outside Santa Rosa, California. They have a leased access agreement with a local nonprofit, Gianni Cycling Club, who now build and maintain trails in the MRC owned forest. The club and the company coordinate trail closures when company workers will be out on the land, but for the many years the land sits fallow and trees grow, people can recreate. In this particular instance, the forest abuts a California State Park, which expands the trail mileage available.

While there are working lands all over the state that could potentially provide recreational infrastructure to the public, many landowners are unaware of the liability protections afforded to them through California's recreational immunity statutes in Civil Code Section 846. This is a real barrier to expanding recreational access to private lands. One strategy we'd like to expand upon is ensuring that landowners fully understand Civil Code Section 846, California's recreational immunity statutes, and the protections it provides them.

*Create adult and youth-centered programming at outdoor spaces to inspire and build confidence across a broad range of recreational users*

While access to the outdoors is a key focus of the Outdoors for All strategy, we feel that access itself is not enough. To truly develop a sense of connection to a place, a landscape, or a park, people need to experience and connect with nature in that place. Communities that currently have little access to public lands and open spaces, also have little access to forms of outdoor recreation that will entice them to return to those landscapes.



Outdoor recreation programming, when presented in a culturally sensitive and audience-appropriate manner, can give people a reason to keep returning to the outdoors. Simple activities like a walk in a park are a great start, but hiking a trail in a forest may be intimidating to those who have had little exposure to wild lands. Programs that lead people on hikes, or get people on a bicycle, or provide lessons on surfing, mountain biking, fishing, camping, mushroom foraging, etc, are needed to help incentivize people to spend more time outdoors, over and above just providing access. We're encouraged to see this reflected in strategies 3.8 and 3.8.1, but would like to see more specific language around the types of recreational activities and programs that might be offered.

Similarly, in Strategy 1.7.1 we were pleased to see the desire to accommodate a broad range of abilities, skill levels and experiences. We feel that, as within many outdoor recreational activities, there is a need to accommodate progression of skill. We need opportunities for beginners to experts in any activity. However, Strategy 1.7.1 is the only mention of those with mobility impairments. We'd like to see an additional strategy that encourages the inclusion of outdoor access, recreational opportunities and programming for those with mobility impairments, as well as other disabilities or physical challenges, wherever feasible.

#### *Address Rock Climbing Access*

Rock climbing opportunities in California are not only world class, they are also fundamental economic drivers for many rural communities and an important asset for Californians. Rock climbing in California exists across various land management agencies as well as private lands.

Gaining access to rock climbing on private lands can be challenging. The climbing community often loses access to climbing areas on private or even county owned land due to liability misunderstandings. Human powered recreation groups including rock climbing access groups like the Access Fund often take on additional insurance policies and indemnify management of land to ensure access. Additional education and support from the state on these access issues would be ideal.

Support from the state in allowing rock climbing as an activity on state lands and in state parks could use additional support. Many state parks have rock climbing resources. However, the way each area is managed varies widely creating confusion and in many cases a loss of access to climbing. Climbing in state parks is vital to bringing local climbing opportunities in more urban areas of the state and should have broader support from the state.



## *Address Winter Recreation Access*

From Mt. Shasta to Lassen, from the Sierra Nevada to the San Gabriel and San Bernardino ranges, winter recreation opportunities in California are not only world class, they are also fundamental economic drivers for many rural communities and an important asset for Californians. These opportunities include not just resort skiing but also backcountry skiing and snowboarding, snowshoeing, Nordic or cross-country skiing—these three categories are the top three fastest-growing segments of the winter recreation economy, with many millions of participants nationally—as well as ice climbing, winter fat-biking, winter mountaineering, family roadside snowplay, and motorized over-snow vehicle recreation (aka snowmobiling). As alluded to above, the great majority of these opportunities occur on federal landscapes managed by either the National Park Service or the United Service Forest Service. Many important trailheads, parking areas and other access points to winter recreation, by contrast, are managed or funded by state agencies such as California State Parks (Sno Parks) or CalTrans. Many hundreds of miles of winter recreation trails are groomed and maintained on federal lands using state OHV funds. The strategy should therefore consider and find ways to greatly improve coordination between state and federal agencies for the benefit of winter recreation. This must include robust participation by relevant state entities in large-scale, long-range federal planning processes such as the ongoing Subpart C winter travel planning process currently underway on 7 different forests across the Sierra Nevada, as well as in many local infrastructure planning efforts such as that currently being undertaken by the Tahoe National Forest to improve year-round parking and access to Castle Valley from Donner Summit.

## *Coastal Recreation*

From whale watching and paddlesports, to diving, surfing and beach-going, California has a wide range of diverse ocean users. In California, the beach is a treasured public trust resource that enables approximately half of the state's population to visit at least once annually, with coastal recreation alone estimated to support \$26.5 billion in GDP to California and employ over 440,000 people. Our coastline is not just biodiverse and beautiful—it is accessible. Unfortunately, sea level rise and the pressure to develop the coastline are resulting in 'coastal squeeze' that threatens the availability and accessibility of beaches. Further, historic injustice and lack of investment in marginalized communities has contributed to inequities in who is able to access the coast. The strategy should focus on interagency coordination for preparing for sea level rise, as well as intentional planning to encourage all users to be able to access the coastline.



### *Develop recreational opportunities around post-fire recovery*

California has seen an increase in the size and severity of wildfires over the past decade. In many cases, fires that burn a moderate or higher severity can cause damage to trail systems and other recreation infrastructure. Fire damage, along with fire-related closures, can prevent members of the public from accessing important recreation areas until areas are restored and conditions are safe. We recommend including strategies to consider how post-fire restoration work by CAL FIRE and other relevant state agencies might contribute to equitable outdoor access in the period following wildfires. As trails are repaired or restored, there is an opportunity to improve their sustainability and resilience through realignment, trail hardening, improved drainage, etc, thereby increasing access for all trail users.

### *Incorporate trail and recreational infrastructure planning into fuels reduction planning*

The environmental analysis for proposed fuels reduction projects is very similar to, and overlaps with, environmental analyses needed to construct new trails or other recreational infrastructure. As we deal with mitigating wildfire risks by reducing fuel loads on California's forested lands, shaded fuel breaks are being planned for and studied for their environmental impacts. Often these shaded fuel breaks are strategically placed to help protect communities from wildfires. These shaded fuel breaks provide an opportunity to plan for and create new trails. Since these fuel breaks are often near communities, any trails constructed would directly benefit those communities. Trails within fuel breaks also provide easier access for future fuels reduction maintenance, as well as access for fighting fires. A great example of this is the Skyline trail in Big Bear Lake, California, where a new trail was constructed inside a shaded fuel break. By leveraging the EA already done for the fuels reduction work the EA for the trail was streamlined and the project was able to move forward much more efficiently. As we plan to reduce fuel loads throughout the state, we need to seek out opportunities to do environmental analyses with multiple-benefits including safety, wildfire resilience and recreation.

### *Impact of Air Pollution on Outdoor Access*

Many areas of California suffer from very high levels of air pollution that can make outdoor recreation unsafe for certain populations. This pollution includes anthropogenic emissions from industrial and agricultural sources, as well as high levels of particulate matter that occur during wildfires. Many Californians are unaware of the health risks related to recreating during periods of bad air quality. We recommend including a strategy aimed at collaborating with CA Air Resources





Board, as well as local air districts, to help notify members of the public when outdoor activities may be unsafe.

### *Outdoors for All and Social Media*

Many visitors to California’s outdoor spaces first learn about recreation destinations via social media, including through geotags and travel and tourism-related accounts. The Strategy would benefit from considering how social media platforms might be used to educate members of the public about where and when to recreate outside, as well as leave-no-trace principles and other components of outdoor etiquette when visiting outdoor spaces.

#### IV. Funding and Agency Capacity

It is essential that both state and federal agencies have adequate capacity to provide for a high quality, sustainable outdoor recreation experience on California’s public lands. To this end, we are pleased to see Priority 5 (“Build Equitable Career Pathways and a Representative Workforce”) and Priority 6 (“Align Funding to Achieve Outdoors for All”) include strategies aimed at building the state’s capacity to manage recreational use and provide pathways for more Californians to get outside. At the federal level, years of flat or declining budgets relative to inflation have left land managers with inadequate resources to manage historically high levels of visitation on public lands. This has resulted in deteriorating trails and recreational infrastructure and an ever-increasing maintenance backlog. Deferred maintenance and degraded trails are themselves a barrier to getting more people outdoors. This gap in the state’s recreation workforce can be filled partly by resources at the state level. The Strategy could benefit from a further discussion or analysis of where gaps exist in staffing at California State Parks and other relevant agencies, what actions are needed to address these gaps and maintenance backlogs, and where additional contributions from partner organizations might be helpful for supporting the goals of Outdoors for All.

Existing funding streams for trails, such as California’s Recreational Trails Program (RTP) and the Trails & Greenways Program, have only been able to fund a very small percentage of the applications received. The demand for trails and greenways far exceeds the state’s investment in them. These chronically underfunded programs need significantly more investment and prioritization in the state budget in order to attain the goals of Outdoors for All.



V. State of California support for proposed Federal Legislation to advance California’s Outdoors for All Strategy

The 118th Congress is currently considering several pieces of legislation that would facilitate equitable access to outdoor recreation in California. Outdoor Alliance California strongly recommends that the state provide support for the legislation listed below in order to advance the goals of Outdoors for All.

America’s Outdoor Recreation Act (AORA) (S.873) The *Outdoors for All Act* is included in the AORA which codifies the Outdoor Recreation Legacy Partnership (ORLP) program in federal law and ensures that funding will go to communities without adequate access to local parks. As our cities grow and the effects of climate change intensify, the *Outdoors For All Act* would allow for equitable access to the benefits of local parks—from job creation, to shade and tree cover, to clean air. ORLP improves and funds new trails, green spaces, playgrounds, cultural gathering spaces, and more, bringing nature’s benefits to urban residents’ doorsteps.

Protecting Unique and Beautiful Landscapes by Investing in California (PUBLIC) Lands Act (S.1776)

The Protecting Unique and Beautiful Landscapes by Investing in California (PUBLIC) Lands Act would increase protections for over 1 million acres of federal public lands throughout Northwest California, the Central Coast, and the greater Los Angeles region, including nearly 600,000 acres of new wilderness, more than 583 miles of new wild and scenic rivers, and the expansion of an existing national monument by more than 100,000 acres. This legislation would protect California’s iconic landscapes, provide critical access to open space for communities, support California’s outdoor recreation economy, and fight the climate crisis. Guided by science and input from local communities, the bill also advances the nation’s and California’s goals of conserving 30% of our lands and waters by 2030.

Title I: Northwest California Wilderness, Recreation, and Working Forests Act would protect approximately 262,000 acres of public lands as wilderness, designate 379 miles of new wild and scenic rivers, require management plans for 101 miles of wild and scenic rivers, restore forests and fish habitat, and help cleanup lands and waters impacted by trespass marijuana grows. The bill would also increase wildfire resiliency in northwest California by requiring federal agencies to develop coordinated fire management plans with input from local communities.



Title II: Central Coast Heritage Protection Act would designate approximately 288,000 acres of public land in the Los Padres National Forest and Carrizo Plain National Monument as wilderness, about 159 miles of streams as wild and scenic rivers, and establish two national scenic areas totaling approximately 34,880 acres. It would establish a 400-mile long Condor National Scenic Trail, stretching from Los Angeles to Monterey County, which would enhance equitable access to the Los Padres and benefit local economies. These designations would provide lasting protections for California’s abundant biodiversity, support clean drinking water, protect tribal cultural sites, and limit irresponsible oil drilling and other industrial activities on these undeveloped lands.

Title III: San Gabriel Mountains Foothills and Rivers Protection Act would expand the San Gabriel Mountains National Monument by over 109,000 acres to include the western Angeles National Forest and establish a National Recreation Area along the San Gabriel Valley foothills and the Rio Hondo and San Gabriel River corridors. The bill would designate over 30,000 acres as wilderness and over 45 miles of Wild and Scenic Rivers throughout the San Gabriel range. Los Angeles County is one of the most park-poor, densely populated, and polluted regions in the United States. This bill would increase equitable access to our public lands by increasing recreational opportunities for the 17 million people living in the Los Angeles region.

Transit to Trails Act (S.1440) The bill would establish a grant program that will fund projects to make transportation to these spaces more accessible for underserved communities. Underserved communities are often left out from accessing our public lands due to limited transportation options. The *Transit to Trails Act* provides an equitable solution by funding projects that improve public transportation to green spaces and public lands, making it more accessible for everyone.

Rim of the Valley Corridor Preservation Act (S. 1466) The Rim of the Valley Corridor Preservation Act will expand the Santa Monica Mountains National Recreation Area by 191,000 and facilitate more equitable access to outdoor recreation opportunities. The bill will support recreation and conservation planning as well as needed capital improvements on public lands surrounding the San Fernando Valley and the greater Los Angeles area. More than half of Los Angeles County, including some of the areas covered by the proposed National Recreation Area Expansion, is considered “park poor”, with the vast majority of these areas located in communities of color. Passing the Rim of the Valley Corridor Preservation Act will expand outdoor access in areas where it is needed the most, while giving the NPS the authority to better facilitate a positive outdoor experience in those areas



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On behalf of the human-powered outdoor recreation community, we thank you for your work in developing the Outdoors for All strategy. We look forward to continuing to work with you to advance conservation and sustainable and equitable recreation access in California.

Best regards,



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## Appendix A

By way of illustration, we have included below a number of recommended outdoor recreation access projects that would specifically and significantly contribute to California's Outdoors for All Initiative. This is an opportunity to look holistically at conservation of habitat and biodiversity, outdoor recreation, equitable access to the outdoors, and climate resiliency to achieve sustainable results that will benefit communities immediately as well as future generations.

[ReWild Mission Bay](#), in San Diego County is an effort to restore some of San Diego's last remaining wetlands, historically home to Indigenous Kumeyaay communities. ReWild is a multi-benefit project that will support the state's carbon capture and coastal resilience goals - it will also facilitate access to the wetlands in the form of raised boardwalks, opportunities for bird watching and cleaner water to the broader Mission Bay, which supports more than 15 million visitors a year.

[Towns to Trails Plan](#): The Towns to Trails Plan seeks to provide soft-surface infrastructure, in the form of multi-use trail connections between towns and public lands across more than 200 miles of the Eastern Sierras spanning four Counties. The project could help drive economic development in the towns connected, and increase recreational opportunities for local residents.

[Castle Valley Trailhead Project](#): The Castle Peak trailhead is one of the most heavily utilized OHV/OSV and non-motorized use trailheads on the Truckee Ranger District. It is severely limited by undesignated parking and a lack of restroom facilities. The result is that users are forced to park unsafely on roads or in forested areas exacerbating soil compaction, runoff, and erosion resulting in environmental degradation and diminishing the user experience. These issues persist year-round but are especially challenging during the winter months when access is further limited by snow and snow removal. Creation of designated parking areas and restroom facilities will enhance user experience at the trailhead.

[Connected Communities](#): This project in the Lost Sierra is a model that will achieve the objectives outlined in several State-adopted strategies around wildfire resilience, economic development, community revitalization, and Outdoors for All. We were pleased to see this exciting project specifically called out in the draft strategy, as we would like to see where the Connected Communities model might be replicated in other underserved rural areas of the State.

[Puente Hills Landfill Park](#): This is an incredible example of recovering former industrial lands to provide new open space, habitat, greenway connectivity, and outdoor recreational opportunities for park poor urban communities in Los Angeles County.



[The California State Recreational Trails Master Plan](#): This plan for regional trails across the state recognizes the importance and significance of trails as recreation destinations for all Californians, and for visitors to the state. This plan is currently undergoing an update, providing an opportunity to propose new trail alignments that could help benefit local communities, connect people to their public lands, and provide outstanding recreation tourism opportunities for all Californians.

