

# OUTDOOR ALLIANCE

March 26, 2020

Angela Bulla  
Acting Fluid Minerals Branch Chief  
Utah State Office  
BLM Utah, Interior Region 7  
440 West 200 South, Suite 500  
Salt Lake City, UT 84101  
*Via email* blm\_ut\_lease\_sales@blm.gov

**Re: Outdoor Alliance Comments on Utah June 2020 Competitive Oil and Gas Lease Sale (DOI-BLM-UT-0000-2020-0002-EA)**

Dear Ms. Bulla:

As representatives of the outdoor recreation community, Outdoor Alliance offers the following comments to the Bureau of Land Management's (BLM) Environmental Assessment (EA) for the Utah June 2020 Competitive Oil and Gas Lease Sale (DOI-BLM-UT-0000-2020-0002-EA). Outdoor Alliance appreciates the BLM's removal of two key recreation parcels from this lease sale, those affecting the Slickrock Trail and Sand Flats Road, as these areas provide some of the most iconic mountain biking opportunities in the country. However, two remaining proposed oil and gas lease parcels in this sale implicate recreation assets that, while perhaps not as famous as the Slickrock Trail, nonetheless contain very significant recreation opportunities meriting protection.

Through this environmental assessment (EA) and subsequent lease sale, the BLM considers four publicly nominated parcels comprising 4,376.5 acres for the lease sale. Three of these parcels significantly affect recreation assets, specifically nationally significant boating opportunities<sup>1</sup> on the Green River and several important rock climbing assets at Muleshoe Canyon.<sup>2</sup>

The proposed leases contemplated in this EA could cause safety and health issues and damage the outdoor recreation experiences of boating enthusiasts, rock climbers, hikers, hunters and anglers, and other users of the world class public lands in southern Utah.

<sup>1</sup> See <https://www.americanwhitewater.org/content/River/detail/id/3765/>. Proposed parcels in this EA that affect boating include parcels 001 and 002.

<sup>2</sup> See <https://www.mountainproject.com/area/108459078/sunvana-wall>, affected by proposed parcel 014.



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Further, leasing for oil and gas near recreation areas will undermine volunteers' investments to improve, develop, and maintain quality recreation opportunities.

Outdoor Alliance is concerned that these proposed leases and subsequent ground disturbing activities will affect recreation assets and experiences, in particular important boating on the Green River, which will negatively affect the City of Green River, a municipality working hard to develop its recreation amenities and boost its outdoor recreation economy. The City of Green River lies in between two recently designated Wild and Scenic River segments, Desolation and Labyrinth Canyons, and is working under grants with the Utah Office of Outdoor Recreation Industry and Emery County Travel Bureau, along with other state and local agencies, to develop river access and amenities to encourage contiguous recreational use on the river between these two river segments.<sup>3</sup> These efforts from the City of Green River are promoting water-based recreation on the Green<sup>4</sup> as a strategy to capture outdoor recreation tourists and boost the local economy. Impacts to scenery and water quality from parcels 001 and 002 could have a direct effect on these efforts.

Because this lease sale could negatively affect community health and diminish opportunities for quality outdoor recreation by increasing industrial traffic and causing sound, sight, and exhaust pollution near the recreation assets, Outdoor Alliance asks the BLM to permanently defer or, at minimum, significantly strengthen stipulations for, leasing parcels 001, 002 and 0014. Protecting southeastern Utah's recreation assets from impairment due to oil and gas leasing is consistent with the BLM's multiple use mandate<sup>5</sup> and will help accomplish the goals of Secretarial Order 3366<sup>6</sup> to "elevate the priority of outdoor recreation on public lands and waters managed by the Department of Interior."<sup>7</sup>

## Outdoor Alliance

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

<sup>3</sup> See Green River Visioning Conceptual Study Report attached

<sup>4</sup> See Green River Circulation Plan attached

<sup>5</sup> See <https://www.blm.gov/or/regulations/files/FLPMA.pdf>.

<sup>6</sup> See [https://www.doi.gov/sites/doi.gov/files/uploads/signed\\_so\\_3366.pdf](https://www.doi.gov/sites/doi.gov/files/uploads/signed_so_3366.pdf).

<sup>7</sup> See <https://www.doi.gov/pressreleases/zinke-signs-secretarial-orders-increase-recreational-opportunities-public-lands-and>.



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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.

Outdoor Alliance is concerned that in this EA the BLM fails to analyze potential impacts from these proposed lease sales on specific recreation areas. Because the direct, indirect, and cumulative effects that would result from implementation of this lease sale would be detrimental to recreation experiences and local communities that have invested in recreation assets, the BLM should better analyze the effects of this competitive lease sale on the region’s recreation economy and how it would inhibit future growth opportunities in the local business community and socioeconomics regionally. Outdoor Alliance asks the BLM to defer the leases noted herein and provide a more appropriately detailed EA that considers how to best implement its multiple use mandate and protect recreation as a “primary” multiple use of our public lands consistent with the Federal Land Policy and Management Act (FLPMA).

## Utah Recreation and Socioeconomics

The state of Utah contains world-class recreation resources, many located on BLM lands, which support 110,000 direct jobs and drive the state’s \$12.3 billion outdoor recreation economy. Popular recreational activities within the scope of this proposed lease sale include boating, mountain biking, hiking and backpacking, trail running, horseback riding, scenic driving, and off-road driving. The national \$887 billion outdoor industry brings jobs to communities across the country in many ways. Recreation visitors bring needed dollars to cities and towns that have recreation assets like rivers, trails, and other outdoor spaces where many outdoor activities take place. Outdoor recreation companies, as well as businesses beyond the traditional outdoor recreation economy, are choosing to locate in Utah communities because their employees want to live in places with access to the great outdoors. We believe that the potential to expand the benefits from Utah’s outdoor recreation economy should be given strong consideration especially in public land use planning documents such as this EA.

Responsible oil and gas development also creates jobs and revenue in Utah communities. However, many communities in Utah and across the country that have previously depended primarily on resource extraction have begun to diversify their economies in



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ways dependent upon access to outdoor recreation opportunities. This lease sale presents significant potential harm to recreation resources, the outdoor recreation brand of local communities like Green River, and the desirability of these communities as draws for more diversified economic activity. Given the importance of recreation on Utah's public lands, it is critical that the BLM defer leases and/or implement appropriate protections, including measures designed to protect Utah's recreation resources and scenic public lands.

## City of Green River's Economic Development Strategy Related to River Recreation

The city of Green River, Utah, has engaged in significant planning<sup>8</sup> for economic development related to river tourism. This has included:

- Identification of as outdoor recreation as a most commonly mentioned asset to promote tourism and new businesses (Strategic Plan pg. 9);
- Identification of the City as an ideal basecamp for outdoor recreation in the area, including for Labyrinth and Stillwater canyons (Strategic Plan Map 1);
- A four-phase project to create river access and activity within City limits that would encourage site-specific use as well as facilitate river access for multiday river trips on Labyrinth and Stillwater Canyons (Green River Visioning pg. 5) with trailer accessible boat ramps at a new recreation at 'Riverside Park' (Green River Circulation Pg. 2); and
- Development of recreational amenities that center aquatic and riparian restoration to improve aesthetics and water quality throughout the Green River corridor (Green River Visioning pg. 3).

River-related recreation on the Green River is primarily focused in Desolation Canyon, upstream of the City, and Labyrinth and Stillwater Canyons downstream of town. Parcels 001 and 002 lie in between the public access points to the river for these two highly sought-after river sections. To encourage boaters to continue their trips into the City and onto the lower river segments, American Whitewater, and Outdoor Alliance member organization, worked with local water users, BLM, and the USDA Natural Resources Conservation Service to create boat passage through the large diversion structure just upstream of the city of Green River known as Tusher Dam.<sup>9</sup> The city has been expanding

<sup>8</sup> See [https://www.greenriverutah.com/Document%20center/Phase%20I%20Strategic%20Plan\\_FINAL.pdf](https://www.greenriverutah.com/Document%20center/Phase%20I%20Strategic%20Plan_FINAL.pdf)

<sup>9</sup> <https://www.americanwhitewater.org/content/Article/view/articleid/33761/>



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on that accomplishment in recent years. These oil and gas leases and subsequent ground disturbance would likely diminish the quality of the recreational resources that local, state, and regional organizations have been working to enhance.

## Recreation Conflicts with Green River Boating

This EA proposes leases (Parcels 001 and 002) adjacent to the Green and will negatively impact Labyrinth Canyon on the Lower Green River,<sup>10</sup> which was recently designated in the John D. Dingell, Jr. Conservation, Management, and Recreation Act as a Wild and Scenic River.

Proposed lease parcels 001 and 002 would affect the viewshed of boaters—and potentially impair the water quality—on the Green River, which includes two important sections, Labyrinth Canyon and Stillwater Canyon. The popular trip through Labyrinth Canyon on the lower Green River can be enjoyed at almost any time of the year. This backcountry stretch is unique as it is an easy flatwater run suitable for canoes, kayaks, and rafts of all types. Labyrinth Canyon was named by John Wesley Powell during his 1869 expedition for its meandering course. The canyon is a geologic wonderland with canyon walls composed of layered sandstone.

Below Labyrinth Canyon, Stillwater Canyon winds through Canyonlands National Park. Amazing rock formations and scenery on a grand scale, along with ruins and rock art sites, provide plenty of opportunities for exploration. Here the river provides access into the Doll House and the Maze. In addition to visual,<sup>11</sup> safety and water quality impacts to the Green River, the EA fails to acknowledge the socioeconomic benefits of boating on the Green. The EA identifies recreational impacts as an issue not included in further analysis,

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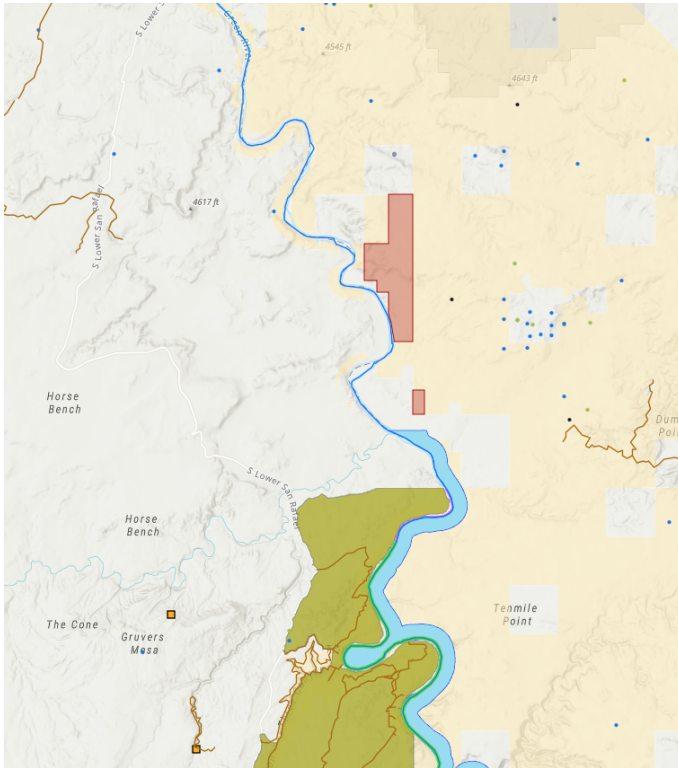
<sup>10</sup> See <https://www.americanwhitewater.org/content/River/detail/id/3765/>

<sup>11</sup> Parcel 001 is partially managed as VRM Class II, which is managed as NSO in the Moab MLP (UT- S-404). This stipulation, as well as the one-mile set-back from the Green River (UT-S-407) protect the visual values along the Green River will be attached to parcel 001.





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but does not clearly provide a rationale that there would be no impacts of a leased and developed parcel 001 or 002.

The Utah Division of Forestry, Fire, and State Lands (FFSL) jointly manages the segment of river adjacent to these parcels with the BLM. Their Final Comprehensive Management Plan identifies the need to “balance recreation needs, development, and protection of the natural environment.” However, the objectives specifically state that any new development shall not inhibit or negatively affect existing recreation or prevent future recreation infrastructure.<sup>12</sup>

The EA incorrectly identifies Wild and Scenic River as “not present” within the area impacted by the proposed action. Parcels 001 and 002 are 3.9 miles from the beginning of Labyrinth Canyon section, which was designated as Scenic in the John D. Dingell, Jr. Conservation, Management, and Recreation Act this past year. Contamination of groundwater and leaks or spills from oil and gas drilling on either parcel could cause severe impacts to this section of the Green River. BLM needs to address the Wild and Scenic Rivers resource as “present with potential for relevant impact that needs to be analyzed in detail in the EA” to accurately analyze the proposed action and ensure protection *and* enhancement as outlined in BLM Manual 6400.

## Recreation Conflicts with Climbing in Muleshoe Canyon

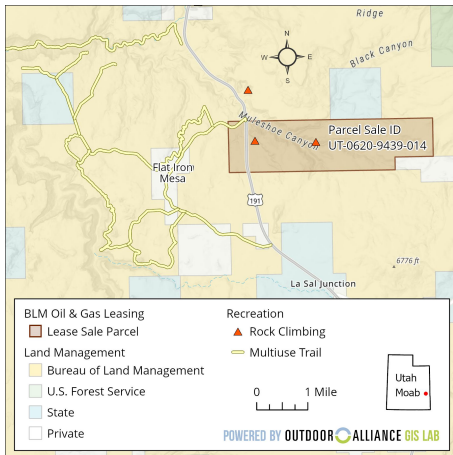
This EA also proposes leasing Parcel 014, which affects several rock climbing routes at Muleshoe Canyon, including the Muleshoe Canyon Tower and various routes on the Sunvana Wall. This is a beautiful, remote-feeling canyon only minutes from Moab with easy access to a selection of “easy” climbs, which is unusual for the Moab area. Muleshoe is also a great winter climbing location given its generally south-facing climbing routes.

<sup>12</sup> [https://ffsl.utah.gov/wp-content/uploads/GreenRiver\\_Final\\_CMP\\_January\\_2020\\_Compressed.pdf](https://ffsl.utah.gov/wp-content/uploads/GreenRiver_Final_CMP_January_2020_Compressed.pdf)



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Rock climbing in the region has become a significant activity on local BLM lands, attracting thousands of climbers internationally and generating significant revenues to the local economy.



Parcel 14 also sits astride State Route 191, which is a scenic drive connecting Moab with various attractions further south such as Indian creek and Bears Ears National Monument. Impacts to the recreation setting here include visual<sup>13</sup> impairment from industrial activity and degraded air quality. Unfortunately, this EA also fails to acknowledge the socioeconomic benefits of climbing in Muleshoe Canyon.

## This EA Fails to Take Hard Look at Impacts from Oil and Gas Leasing on Outdoor Recreation and Related Socioeconomics

The BLM has an obligation under the National Environmental Policy Act (NEPA) and FLPMA to evaluate the direct, indirect, and cumulative impacts of this lease sale on implicated recreation assets. Under NEPA, the BLM must fully evaluate the direct, indirect, and cumulative impacts of its actions and, importantly, must supplement prior environmental analyses when presented with “significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.”<sup>14</sup> Moreover, under FLPMA, BLM must maintain and base implementation decisions on current inventories of the public lands “to identify new and emerging resource and other values.”<sup>15</sup> The BLM must also strive to coordinate its management actions “with the land use planning and management programs” of local governments.<sup>16</sup> Yet, for this lease sale, BLM has not fulfilled these requirements as they pertain to the town of Green River and its associated recreation opportunities.

<sup>13</sup> Parcel 014 has lands that are managed as VRM Class II. A stipulation imposed on VRM Class II lands in the Moab RMP (UT-S-158) require that mineral operations meet VRM Class II objectives. This would protect the visual resources on Parcel 014. That portion of Parcel 014 that is within the Moab MLP has restrictions on mineral operations for areas that were inventoried as VRI Class II but managed as VRM Class III (UT-S-401).

<sup>14</sup> 40 C.F.R. § 1502.9(c)(1)(ii).

<sup>15</sup> 43 U.S.C. § 1711(a).

<sup>16</sup> Id. § 1712(c)(9).



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The BLM delays any meaningful analysis of the impacts of these leases<sup>17</sup>—including any impairment of recreation and water and air quality resources—until the subsequent Application for Permit to Drill (APD) phase after the leases are sold. Federal courts have rejected this approach, particularly when, as here, BLM is not in each case employed no-surface occupancy (NSO) stipulations that will prevent future ground-disturbing activities.<sup>18</sup> In order to take the “hard look” at the implications of federal actions as required by the National Environmental Policy Act (NEPA), the BLM is required to consider the incremental effects of these lease sales :

when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.<sup>19</sup>

In this EA, Outdoor Alliance believes the BLM fails to take a hard look at impacts on boating and climbing from these proposed oil and gas leases. Among other effects, industrial activities from these proposed leases have the potential to discourage visitors from coming to Green River and boating Stillwater and Labyrinth Canyons, resulting in a loss of tourist income for the local economy.

The EA notes that “Parcels 001 and 002 are upstream of Ruby Ranch, the main put-in for boaters through Labyrinth Canyon. [And that] some boaters put in upstream at Green River State Park, and may be subjected to the sights and sounds of development of the parcel.” This impact should be more extensively assessed in the EA. This development would hinder expansion of boaters putting in at the State Park, directly affecting efforts to broaden the use of that public river access. While Ruby Ranch is more heavily used, it is privately owned and thus subject to changes in use. The BLM asserts that the “parcel is NSO on all but the northern portion of the parcel (Figure 11), but all of the NSO outside of the Three Rivers Withdrawal has exceptions, modifications and waivers that would allow

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<sup>17</sup> EA at 3.

<sup>18</sup> See *New Mexico ex rel. Richardson v. BLM*, 565 F.3d 683, 718 (10th Cir. 2009) (concluding “that issuing an oil and gas lease without an NSO stipulation constitutes” an “irretrievable commitment of resources” requiring a site-specific analysis of foreseeable impacts).

<sup>19</sup> 40 C.F.R. § 1508.7.





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development under certain circumstances.”<sup>20</sup> Moreover, Parcel 001 is within the Moab MLP, which imposes an NSO stipulation (UT-S-407) on within one mile of the Green River, a popular flatwater floating venue. In addition, Parcel 001 is partially within the Three Rivers Withdrawal, which is managed as NSO under UT-S-362.<sup>21</sup> The EA fails to provide analysis on how these stipulations would affect the type and size of development on the site and how the river recreation experience would be impacted.

This EA acknowledges foreseeable impacts to outdoor recreation<sup>22</sup> by, for example, noting that “past and present actions that have affected and would likely continue to affect air quality” from “surface disturbance resulting from oil and gas development and associated infrastructure” affecting “...recreation (including OHV use).” And in fact, the “past and present actions... would likely continue to affect air quality [and] are too numerous to list” but are likely to “reduce air quality through emissions of criteria pollutants (including fugitive dust), VOCs, and HAPs, as well as contribute to deposition impacts and to a reduction in visibility.” And the BLM also acknowledges that leasing is on the rise: “[a]t the end of 2018 there were 13,752 active wells in Utah, up from 10,308 active wells in 2008,” and “[e]missions from the wells estimated for this lease sale would add to the emissions from the existing active wells.” The deferral of analysis on air quality until ADP review does not allow for cumulative effect analysis on air quality and how that air quality could affect existing and future recreational resources.

While the BLM acknowledges likely air-quality impacts from these leases, the EA fails to account for likely impacts to the water quality<sup>23</sup> of the Green River that is vital to the experiences of the boating community and associated river-based outdoor businesses. The EA states that “leasing the parcels does not directly impact water quality or quantity” and that subsequent “lease notices” at the APD stage will ensure that subsequent actions on the leased parcels “do not degrade existing water quality conditions” because standard operating procedures “required by regulation and design features would be sufficient to...

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<sup>20</sup> EA at 13.

<sup>21</sup> EA at 104. BMPs from the Moab MLP to address noise and night skies (page 5 of Appendix B to the Moab LMP EIS) would mitigate impacts to recreational users. Stipulations UT-S-407 and UT-S-362 on Parcel 001.

<sup>22</sup> EA at 28.

<sup>23</sup> EA at 120.



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protect all usable ground or surface water sources.”<sup>24</sup> These are the same precautions that in 2014 resulted in multiple large-scale leaks of oil and gas into the Green River.<sup>25</sup>

Given the ineffective safeguards on water quality impacts from these new leases, the popularity of this river segment, and the efforts of the city of Green River to develop its river-based outdoor recreation economy, the BLM should defer these proposed lease parcels located adjacent to the Green River.

This EA fails to provide a meaningful analysis of the socioeconomic implications of this lease sale as it pertains to outdoor recreation and the regional economy.<sup>26</sup> While the EA states that “the parcel areas would still receive use by county residents and other visitors including recreationists regardless of alternative selected” and that “socioeconomic impacts from leasing these parcels would be minor, relative to the planning area’s overall economy,” the BLM provides no basis for these statements. BLM asserts that “the principal local economic benefit could come in the form of mineral lease payments” but fails to consider negative implications to the recreation economy from leasing along a popular commercial boating stretch of the Green River.<sup>27</sup> The BLM also fails to recognize strides local communities are taking to encourage growth of the outdoor industry, such as the city of Green River, which has experienced boom and bust cycles from the railroad, agriculture, and mining industries.

The BLM is required in this EA to provide a meaningful environmental analysis of potential impacts from the proposed leases on recreation experiences and related socioeconomics.

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<sup>24</sup> To protect water resources BLM proposes to apply the following stipulations and lease notices as needed: Stipulation UT-S-128, UT-S-386, UT-S-387, UT-LN-128 and UT-LN-53. The SOPs, BMPs, COAs and stipulations will adequately mitigate impacts from the Proposed Action to surface water resources. Surface water resources will not be impacted to the degree that will require detailed analysis in the EA.

<sup>25</sup> See, *Blowout was firm's second spill from old well near Green River*, The Salt Lake Tribune, (May 24, 2014); *Rain drives oil from leak into Green River*, KSL.com, (May 28, 2014); *Company faces \$10K for spill near Green River*, The Salt Lake Tribune, (September 4, 2015).

<sup>26</sup> EA at 119.

<sup>27</sup> See, Economic Profile System Reports, <https://headwaterseconomics.org/tools/economic-profile-system/EPs 2018> (Socioeconomic Measures, Summary Profile). See also 2016 Moab Master Leasing Plan’s (December, 2016) socioeconomic baseline report and economic impact analyses. Additional information is contained in the county general plan and its corresponding resource management plan. BMPs, SOPs and site-specific mitigation may be applied at the APD stage as COAs.

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Pursuant to NEPA and federal case law, environmental analysis is required at the lease sale phase when: 1) there's an "irretrievable commitment of resources," and 2) impacts are reasonably foreseeable.<sup>28</sup> According to federal courts, issuing a lease without a No Surface Occupancy (NSO) stipulation is an "irretrievable commitment of resources," because at that point BLM no longer has the authority to stop surface-disturbing activities. Because proposed leases in this EA containing recreation resources that do not benefit from an NSO designation, issuing those leases constitutes an irretrievable commitment of resources. Secondly, as noted above, the BLM's own Reasonably Foreseeable Future Development scenario (RFFD) for oil and gas in the Moab Field Office identifies foreseeable impacts for these leases.

Accordingly, because the BLM is irretrievably committing public resources, and the BLM's own RFFD describes significant ground-disturbing activities that could negatively impact recreation experiences, the BLM should either defer the leases in this EA that contain recreation assets or reissue this EA with a more detailed environmental analysis of impacts from oil and gas leasing on recreation assets and socioeconomics regionally.

## Recommended Leasing Mitigation to Protect Recreation Assets

The BLM's multiple-use mandate prohibits the management of public lands primarily for energy development or in a manner that unduly or unnecessarily degrades other "co-equal" uses. "Outdoor recreation, fish and wildlife, grazing, and rights-of-way must receive the same consideration as energy development."<sup>29</sup> Therefore, we request that the BLM either defer the leases in this EA that implicate recreation assets, or implement the following standards in order to uphold the agency's multiple use mandate and treat recreation as a co-equal use of public lands:<sup>30</sup>

- NSO stipulation for a 1-mile radius from developed recreation site boundaries.

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<sup>28</sup> See *N.M. ex rel. Richardson v. BLM*, 565 F.3d 683, 716 (10th Cir. 2009) (Federal agencies violated NEPA by issuing non-NSO leases without preparing an EIS. Accordingly, the agencies are enjoined from selling any more leases until they comply with NEPA).

<sup>29</sup> 43 U.S.C. § 1732(a), 43 U.S.C. § 1702(l).

<sup>30</sup> For more information how to best balance energy production and the protection of recreation assets on federal public land, see "Best Practices for Balancing Recreation and Energy Development on Our Public Lands" found at [https://publiclandsolutions.org/wp-content/uploads/2017/04/PLS\\_Balancing-Rec-and-Energy-Report-web.pdf](https://publiclandsolutions.org/wp-content/uploads/2017/04/PLS_Balancing-Rec-and-Energy-Report-web.pdf).

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- NSO stipulation within 0.5 miles of the centerline of high use routes (motorized) and trails (non-motorized).
- NSO stipulation for a 0.5-mile radius around high use recreation areas.
- NSO stipulation to all VRM Class II areas in Special Recreation Management Areas and a Baseline CSU stipulation throughout the remainder of SRMAs.
- Apply an NSO stipulation to Recreation Focus Areas.

\* \* \*

Moving forward, the BLM should develop a more comprehensive analysis of recreation use patterns and how these leases might affect those experiences and related socioeconomics. Recreation is an important economic driver to the state of Utah, with long-term growth potential. We ask you to analyze potential impacts from this lease sale on recreational experiences, local tourism, and the broader economy of the communities and residents of Utah.

Best regards,



Louis Geltman  
Policy Director  
Outdoor Alliance

cc: Ed Roberson, Utah BLM State Director  
Kent Hoffman, Utah BLM Deputy State Director of Minerals

Adam Cramer, Executive Director, Outdoor Alliance  
Chris Winter, Executive Director, Access Fund  
Beth Spilman, Interim Executive Director, American Canoe Association  
Mark Singleton, Executive Director, American Whitewater  
Dave Wiens, Executive Director, International Mountain Bicycling Association  
Todd Walton, Executive Director, Winter Wildlands Alliance  
Tom Vogl, Chief Executive Officer, The Mountaineers  
Phil Powers, Chief Executive Officer, American Alpine Club  
Sarah Bradham, Acting Executive Director, the Mazamas



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Keegan Young, Executive Director, Colorado Mountain Club  
Chad Nelson, CEO, Surfrider Foundation

