

OUTDOOR ALLIANCE



April 14, 2014

Margaret Petrella
The Volpe Center (RVT-21)
55 Broadway Street
Cambridge, MA 02142

Re: Information Collection; Interagency Generic Clearance for Federal Land Management Agencies Collaborative Visitor Feedback Surveys on Recreation and Transportation Related Programs and Systems.

Dear Ms. Petrella:

Outdoor Alliance is a coalition of five national, member-based organizations, including Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, and Winter Wildlands Alliance, that represents the interests of the millions of Americans who paddle, climb, mountain bike, hike, and backcountry ski and snowshoe on our nation's public lands, waters, and snowscapes. Collectively, Outdoor Alliance has members in all fifty states and a network of approximately 1,100 local clubs and advocacy groups across the nation.

As outdoor recreationists and as consistent participants in the public land management planning process, we applaud the efforts of land management agencies to improve the collection of information on visitor use.

Under numerous planning mandates, agencies are working to modernize the planning process and improve opportunities for public participation. Additionally, it is clear that effective planning requires sound information on visitor use, and we believe there is substantial room for improvement in the collection of this data. Over the course of our participation in numerous Forest Plan revisions and other planning efforts, Outdoor Alliance has come to believe that many of the statistical tools available to land management agencies have material shortcomings in their abilities to deliver useful information on visitor use, and we commend the land management agencies for working to improve the use and usefulness of statistical information.

The Request for Comment solicits feedback on four questions, which we address in turn.

(1) Whether this collection of information is necessary for the stated purposes and the proper performance of the functions of the FLMAs, including whether the information will have practical or scientific utility.

We believe that expanding and improving upon the collection of visitor use information will have great practical value in improving the efficacy of planning efforts. Planning requires a clear,

accurate, and thorough depiction of the resources under review in order to produce ecologically, socially, and economically sustainable results, and we believe that enhancing land management agencies' ability to coordinate on data collection will improve the quality of the data collected, minimize burdens for the agencies and respondents, and assist in the development of sound multi-jurisdictional management programs.

(2) The accuracy of the FLMAs' estimate of the burden of the collection of information, including the validity of the assumptions used.

Neither the agencies' estimate of the burdens of collection nor the assumptions used seem unreasonable.

(3) Ways to enhance the quality, utility, and clarity of the information to be collected.

There are several ways that agencies can enhance the quality of information collected and at the same time lower the burden on respondents. First, agencies should consider organizing working groups topically rather than regionally. For example, to the extent that agencies find it beneficial to conduct mapping exercises or targeted surveys, separating requests for information about recreation from other planning topic areas is likely to improve overall participation. Members of the outdoor recreation community are often extremely knowledgeable and comfortable contributing information on recreation-related topics, but may lack the time or expertise to speak on all possible topics (such as timber, grazing, etc.) potentially relevant to a given landscape.

Working groups that seek information on all possible topics relevant to a region runs the risk of missing information from those individuals, recreational users or otherwise, who may have the most knowledge on a particular topic. Simply put, many recreational users lack the time, interest, or expertise to work through all of the aspects that a Forest Plan or other planning document will address when they are generally most keenly interested in only certain aspects of the plan. Ultimately, topic-specific outreach will enhance the quality, utility, and clarity of the information collected by ensuring that subject matter experts are able to participate in the data collection process.

Second, land management agencies can improve in communicating about the status of the plan revision process. Newer planning regimes, such as the 2012 Forest Planning Rule, are changing the paradigm of land management planning. Rather than having management agencies develop a plan behind closed doors and then present it to the public for comment, the planning process is increasingly including the public through each stage of plan development. We believe that this shift toward iterative and public plan development is an extremely positive step, resulting in better collaboration, better information informing the plan, diminished conflict, and ultimately a better final product. Realizing those benefits, however, is deeply dependent on the ability of agencies to keep the public apprised of the status of planning efforts and opportunities for public input. This is especially important for distant stakeholders who may not be able to attend every public informational meeting about the planning process. Agencies involved in interagency data collection efforts must find ways to communicate the status of those efforts, as well as opportunities to participate, effectively with the public in order to ensure that data collected reflects public use as inclusively as possible. Agencies should consider

publishing that information through their own websites or through a comprehensive national tool similar to the Forest Service's SOPA site.

Third, agencies should be sure to collect information from all stakeholders, both proximate and distant. Overall, the human powered outdoor recreation community is both passionate and highly mobile. Though we often have deep connections to landscapes close to home, many of us frequently travel for long distances in search of highly specific experiences at trails, rivers, climbing areas, or backcountry skiing zones. Consequently, many members of our community may be deeply passionate and knowledgeable about a landscape that may be hours or days away from home. Some methodologies for information collection that require physical presence at meetings, or that route submitted information through those that are actually in attendance, will fail to collect all of the best and most useful information. Any methodology must ensure the collection of information from all engaged stakeholders, even those that live a distance away from the affected landscape.

Finally, in our experience engaging in the Forest Planning process, one widely-used methodology for the collection of visitor information—the National Visitor Use Monitoring (NVUM) program—has serious flaws that we hope will not be replicated in new multi-agency information collection efforts. Because of its site selection methodology, NVUM undercounts many forms of active outdoor recreational use, which do not occur at random across the public lands landscape, but rather at highly specific locations. Additionally, many of these locations are highly condition dependent, and NVUM does not adequately take into account the variables—such as whether a river is at the appropriate level for paddling or a trail system dry enough for biking—that make any location optimal at any given time.

We hope that land management agencies, as part of information collection efforts, will strive to incorporate more place-specific and activity-specific information into collection methodologies and supplement monitoring programs with information from community stakeholders, including Outdoor Alliance member organizations, as needed. In addition, NVUM suffers from a lack of granularity in its breakdown of outdoor recreation activities, and we hope that future data collection efforts will consider a more specific examination of the activities that draw visitors to public lands; examples of this more fine-grained approach include the outdoor recreation participation studies produced by the Outdoor Industry Association.¹

(4) Ways to minimize the burden of the collection of information on respondents, including the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Above all, the best way to minimize the burden of data collection, ensure broad stakeholder input, and collect the best information possible is to employ existing sources of data. A large quantity of data that is both important to the human powered community and descriptive of its activities already exists, online and in print, with more information becoming available every day. Particularly with regard to the mandate of the new Forest Planning Rule to evaluate “recreation settings, opportunities and access, and scenic character” (and analogous requirements in other

¹ Outdoor Industry Association, Outdoor Participation, <http://outdoorindustry.org/research/participation.php>.

planning regimes), a wealth of existing sources already contain relevant information, and agencies can do more to incorporate these data sets.

Many of these existing sources are either operated by or affiliated with Outdoor Alliance member groups. The American Whitewater National River Database contains descriptions of approximately 10,000 whitewater river segments across the country.² The American Canoe Association has over 500 Water Trails mapped in streams, lakes, bays, and estuaries.³ Mountain Project, and independent website affiliated with the Access Fund, includes nearly 100,000 climbing routes across the nation.⁴ MTB Project, a new website developed in partnership with the International Mountain Bicycling Association, is quickly gathering data on mountain biking trails and rides.⁵ This is only a small selection of available sources of information on outdoor recreation settings, and we are actively seeking ways to increase and combine these types of data sets. As well as serving as standalone resources, these data sources can serve as important references when designing data collection programs by allowing agencies to better understand the conditions that draw recreational users and gauge the times and places where visitors are most likely to be counted. These resources are valuable sources of existing information on the activities of the outdoor recreation community, and we are interested in finding ways to increase their utility for land managers, as well.

Thank you for considering Outdoor Alliance's comments on land management agency data collection efforts, and we look forward to serving as a resource for planners working on this important topic.

Best regards,



Adam Cramer
Executive Director
Outdoor Alliance

cc: Brady Robinson, Executive Director, Access Fund
Wade Blackwood, Executive Director, American Canoe Association
Mark Singleton, Executive Director, American Whitewater
Michael Van Abel, Executive Director, International Mountain Bicycling Association
Mark Menlove, Executive Director, Winter Wildlands Alliance
Lee Davis, Executive Director, The Mazamas
Martinique Grigg, Executive Director, The Mountaineers

² American Whitewater, National Whitewater Inventory, <http://www.americanwhitewater.org/content/River/view/>.

³ American Canoe Association, http://www.americancanoe.org/members/group_select.asp?type=7731.

⁴ Mountain Project, <http://www.mountainproject.com/>.

⁵ MTB Project, <http://www.mtbproject.com/>.