

# OUTDOOR ALLIANCE



February 11, 2013

Dr. Donald B.K. English  
USDA Forest Service  
Recreation, Heritage, and Volunteer Resources, Mailstop 1125  
1400 Independence Ave. SW.  
Washington, DC 20250-1125

**RE: Information Collection: National Visitor Use Monitoring**

Dear Dr. English:

Outdoor Alliance is a coalition of six national, member-based organizations devoted to conserving and protecting our nation's public lands and waters and the experiences that they provide. Outdoor Alliance includes: Access Fund, American Canoe Association, American Hiking Society, American Whitewater, International Mountain Bicycling Association, and Winter Wildlands Alliance. Collectively, Outdoor Alliance has members in all fifty states and a network of almost 1,400 local clubs and advocacy groups across the nation. Our coalition represents the millions of Americans who hike, paddle, climb, mountain bike, ski and snowshoe on our nation's public lands and waters. The National Visitor Use Monitoring system has a substantial impact on how Forest Service lands are managed, which in turn substantially affects the recreation experiences of Outdoor Alliance members and our affiliate organizations.

We were pleased to see the Forest Service's request for comment on National Visitor Use Monitoring (NVUM) in the Federal Register late last year.<sup>1</sup> The request posed four questions regarding NVUM and this letter is organized around providing responses to the same.

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

The collection of NVUM information is absolutely necessary for proper assessment and management of recreational resources. Without a sufficient understanding of the recreation experiences people are seeking and the uses or means by which they achieve them, the Forest Service cannot meet the Agency's sustainable recreation objectives.<sup>2</sup>

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<sup>1</sup> 77 Fed. Reg. 73975, Dec. 12, 2012.

<sup>2</sup> Indeed, the new U.S. Forest Service Planning Rule includes the term "Recreation Opportunity" and defines it as, "An opportunity to participate in a specific recreation activity in a particular recreation setting to enjoy desired recreation experiences and other benefits that accrue. Recreational opportunities include non-motorized, motorized, developed and dispersed recreation on land, water and in the air." 36 C.F.R § 219.19 (2012).

Only with improved data on recreation activities, settings and experiences will the Agency be able to adequately provide and manage recreation opportunities. The collected data can provide insights used to develop management practices that mitigate environmental effects, minimize, or in some cases, eliminate social conflict, and provide exceptional recreation experiences. However, in a variety of ways the current NVUM system falls short of providing necessary insights into recreation use patterns, which limits the practical utility of the Agency's information.

To be a substantially valuable management tool, the NVUM system should: a) collect a more representative visitor use data sample, b) more precisely categorize the data, and c) provide guidance on how to analyze the data in the relevant context. Without these improvements current NVUM information is incomplete and can result in less than optimal management decisions.

**(2) The accuracy of the Agency's estimate of the burden of the collection of information, including the validity of the methodology and assumptions used.**

Although the Forest Service's estimate of the burden of collecting the information appears to be accurate, we are not confident in the validity of the methodology and assumptions used. Indeed, there are many instances where the NVUM data indicate that use by one or more human powered recreational pursuits are either low or non-existent despite reports from our members, data collected by state agencies, and/or third party data sources that show considerable use. For example, the NVUM survey does not include rock climbing as an activity, despite this activity being a large and growing form of recreation enjoyed by many of our members. This disconnect is probably not limited to human powered outdoor recreational pursuits and we suspect that other experiences and uses of national forests are also underestimated or missed entirely.

*a. Data Sampling and Acquisition*

Currently, NVUM survey sites are selected "using a stratified random sample of the times and locations where recreational visitors can be counted." However, the locations that people choose to recreate, particularly for human-powered outdoor recreation, are not distributed across Forest Service sites in a manner where random sampling could accurately capture them. Mountain bikers, rock climbers, whitewater paddlers and backcountry skiers and snowboarders all seek out high quality experiences that can only be found at *specific* locations and during certain conditions. Without weighting the site selection and seasonal process to ensure that these favorite locations are included, the sample will result in an under-representation of these activities. Again, this shortcoming is likely not limited to human-powered outdoor recreational pursuits.

The proxy site guidelines show an attempt to correct this weakness; however, the allowable data are substantially limited. The allowable proxy locations are largely connected to developed recreation sites, which further limit the likelihood of capturing information on dispersed recreation activities.

The same problem applies to the timing of the survey days. Paddlers monitor river and creek flows, skiers monitor snowpack, climbers monitor weather trends, and hikers and bikers monitor trail conditions. All of these observations are made for both safety and quality of experience. Given the right conditions an area may see considerable increases or decreases in use. Without taking changing conditions into consideration, the NVUM data will not accurately reflect recreation use patterns.

*b. Categorization of Data*

The current NVUM survey is designed to answer one very broad question: What did you do while you were visiting the forest? As a result the data collected are very broad and can lead to over-generalizations. The current NVUM categories used are a mix of experiential descriptors and activities. Furthermore they create a false sense of mutual exclusivity. For example some forest users use their bicycles to access remote fishing locations, but might do either independent of the other. Backcountry skiers frequently seek the solitude and quiet of the snowscape, but they also enjoy the thrill on the way down. The choices presented simply do not reflect the experiential needs or use patterns of modern recreation.

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

The following items would substantially improve the NVUM's analysis methodology.

*a. Data Sampling and Acquisition*

Outdoor Alliance recreation communities are closely knit and have great communication systems that enable the best user experiences. There are websites that incorporate the locations of the best experiences on a given landscape, such as the best trails, crags, or rivers. Social media and local groups provide constant communication and key information allowing us to know when the trails are too muddy to hike or ride, when river flows are too high or too low, when the snow depth is optimal for backcountry skiing. Proactively incorporating these areas as required sites for the intercept survey or conducting interview sessions with these groups would improve or supplement the data set so that these uses are sufficiently represented.

*b. Categorization of Data*

To generate meaningful insight into how Americans are enjoying the National Forests, survey questions should be designed to generate discrete insights. Bifurcating the question and responses into experiential expectations and the uses or means to achieve them would give the Forest Service substantial insight into forest visitors. For example: the experience could be adventure, solitude or relaxation while the use could be white water paddling, rock climbing or bird watching, in any combination. Updating the list of uses to reflect modern outdoor recreation activities, including rock climbing, would also result in a more relevant data set.

*c. Data Analysis*

As a final measure to ensure that the NVUM data are properly informing management decisions, land managers and anyone else that accesses the data should be given instructions or

disclaimers about the data and its limitations. In addition, sample data should supplement and not supplant local management's actual knowledge of activities that are occurring on the Forest.

Incorporating or at least referring Forest Service decision makers to other sources of data, such as the Outdoor Industry Association Participation Studies<sup>3</sup> or state recreation assessments, the NVUM data could be evaluated against other sources. Where the data are consistent, decision makers would have more support for their decisions. However, where the data were inconsistent the decision makers could seek out additional sources, such as local recreation groups, to fill in the gaps in the data.

**(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.**

We believe adding a method of data collection that allows users to submit visitation and use information without relying on the intercept survey would help increase the value of the data. Any number of methods could be used to accomplish this, for example almost all of our member organizations host websites where users can tell the story of their visit using a narrative description, pictures, and/or GPS routes. Being able to incorporate existing data or enable the importation of portions of it would provide additional insights to how the forest is being used. In the case of GPS routes, the data is even more valuable because the location of the use can be known along with the persons' account of the experience.

Additionally, the Forest Service could utilize the partnership capabilities of organizations like Outdoor Alliance, our member organizations and affiliate grassroots organizations, to proactively seek input on the quantity and quality of forest visitation from our memberships. For example, Outdoor Alliance member American Whitewater maintains a comprehensive database of whitewater paddling resources,<sup>4</sup> and there are many valuable third-party sources for human powered recreation resources, including rock climbing.<sup>5</sup>

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<sup>3</sup> OIA Outdoor Participation reports from 2008 thru 2012 can be found at <http://www.outdoorindustry.org/research/participation.php>

<sup>4</sup> American Whitewater's National River Database can be found at: <http://www.americanwhitewater.org/content/River/view/>

<sup>5</sup> Mountain Project, which includes some 100,000 rock climbing "routes", is one such example: <http://www.mountainproject.com/destinations/>

## Conclusion

Studies like NVUM are extremely valuable opportunities to connect with forest users and understand the experiences they are seeking and the means they use to achieve them. However, the Agency's current NVUM methodology fails to accurately access many human powered recreationalists and does not result in a data set that accurately reflects modern recreation. This often results in land use assessments that are inaccurate or incomplete. Adjusting the sampling methodology to capture a more representative cross section of recreational users is critical to capitalizing on this potential. Furthermore, modernizing the Forest Service perspective on recreation activities and proactively seeking input from recreational users in a partnership context will likely yield a more accurate picture of recreation on our forests.

Thank you for your consideration of Outdoor Alliance's recommendations for improving the Forest Service Manual. All of the Outdoor Alliance organizations look forward to a continued productive relationship with the Forest Service in order to provide human-powered recreation opportunities and to conserve the public lands and waters that we frequent.

Best regards,

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cc: Liz Close, Director; Recreation, Heritage and Wilderness Resources, USFS  
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