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Nov 18, 2021

Secretary Debra Haaland
Department of the Interior
1849 C Street NW
Washington, DC 20240

RE: Advancing Racial Equity + Support for Underserved Communities Through Recreation

Secretary Haaland,

On behalf of the American Alpine Club and our [Climb United](#) and Policy programs, as well as the undersigned individuals and organizations, we are grateful for the opportunity to provide a comment on the critical matter of improving outdoor recreation access to underserved communities.

The American Alpine Club (AAC) is a national climbing and mountaineering organization that represents the interests and values of both our members and the greater climbing community which consists of more than 5 million¹ people and generates \$12.45 billion² a year for the outdoor recreation economy. Our work centers around activating our members in support of the protection of climbing ecosystems and critical landscapes, advancing access to public lands and climbing for all people, protecting and supporting our communities, and mitigating the climate crisis through thoughtful land management practices.

A critical program of the AAC, Climb United (CU), is leading national efforts in the areas of inclusion and equity in climbing and outdoor recreation spaces. The work of CU encompasses a rethinking of how we work within, and in support of, underserved communities and their members to remove barriers of access to public lands, greenspaces, and recreation opportunities. Climb United collaborates with community members, corporate and non-profit partners, lawmakers, thought leaders, and agency officials to envision intentional ways to increase access to the outdoors and create safe and inviting spaces within them. The substance of this comment comes not only from internal AAC staff, but from the lived experience and expertise of leaders within the climbing community.

Introduction

America's public lands have an equitable access problem. According to data gathered by the Outdoor Industry Association in 2019, Black Americans represented 12.4% of the U.S. population, but only 9.4% of

¹Outdoor Industry Association 2019 Outdoor Participation Report <https://outdoorindustry.org/resource/2019-outdoor-participation-report/>

²American Alpine Club State of Climbing Report <https://americanalpineclub.org/state-of-climbing-report>



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outdoor participants³. Additionally, while the Hispanic population is the fastest-growing ethnic group in the United States making up 17.9% of the U.S. population, this group represents just 11.6% of people engaging in outdoor activities⁴. White Americans continue to be the largest group of outdoor participation sitting at 71.5%⁵. For the betterment of all Americans and the protection and stewardship of our lands and waters, it is critical that agencies make an intentional effort to close the diversity gap on public lands.

While there are many logistical and operational changes that DOI can make in order to increase equitable access to recreation for underserved communities, real change at the agency will come from thinking about access issues holistically and committing to the improvement of agency culture. When thinking about creating substantive change in the agency, we encourage you to consider the Curb-Cut Effect⁶. In essence, the Curb-Cut Effect asserts how laws and programs designed to benefit vulnerable or underserved populations, such as people with disabilities or Black, Indigenous, and People of Color, often end up benefiting all of society. The Curb-Cut effect indicates that when agencies begin to manage landscapes utilizing an equity lens, all visitors of these places will benefit. The following comment addresses both the cultural and operational aspects of the issue at hand.

Q1 What are the barriers to visiting public lands and waters managed by DOI (including the Bureau of Land Management, Bureau of Reclamation, National Park Service, and U.S. Fish and Wildlife Service)?

Lack of Acknowledgement of U.S. History

It is important that the agency and its staff acknowledge the fraught history of landscapes under their jurisdiction and provide this context to the public. Additionally, It is critical to address the vestiges of the problematic conservation movement that still remain and inform conservation efforts and the culture of public lands access to this day. The U.S. conservation movement historically benefitted from the forced and, or coercive displacement of Tribal, Indigenous, and First Nations peoples leading to a loss of critical traditional ecological knowledge and trust between Tribal Nations and the federal government. In addition, public lands have been spaces often restricted, either explicitly or implicitly, to use and management by individuals with racial, economic, gender, able-bodied, neurotypical, and geographic privilege. Many of DOI's protected landscapes were protected prior to the Civil Rights Act of 1964⁷, and the process of desegregating National Parks was not underway until 1945⁸ meaning access to recreation sites for Black Americans was restricted. This, in turn, created a barrier to entry and a cultural impact that is still felt in communities today. In order for a cultural shift to take place, these factors must be addressed.

³Outdoor Industry Association. 2020 Outdoor Participation Report <https://outdoorindustry.org/resource/2020-outdoor-participation-report/>

⁴Outdoor Industry Association. 2020 Outdoor Participation Report <https://outdoorindustry.org/resource/2020-outdoor-participation-report/>

⁵Outdoor Industry Association. 2020 Outdoor Participation Report <https://outdoorindustry.org/resource/2020-outdoor-participation-report/>

⁶Blackwell, A. G. (2016). The Curb-Cut Effect. *Stanford Social Innovation Review*, 15(1), 28–33. <https://doi.org/10.48558/YVMS-CC96>

⁷National Park Service Anniversaries <https://www.nps.gov/subjects/npscelebrates/park-anniversaries.htm>

⁸Engle, R. (1996). National Park Service Segregation and Desegregation at Shenandoah National Park.

<https://www.nps.gov/articles/segregation-and-desegregation-at-shenandoah.htm>



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Our Recommendations

- **Issue a statement of acknowledgement that contains actionable items on the relationship between public lands and colonization.** This should happen both within the National office, and on individual park units. Include acknowledgement of the ways in which public lands have been predominantly places restricted to people with privilege, and how the agency is working to address this. Additional educational materials should be made available to the public showcasing the history of individual park units.
- **Incorporate historical and traditional ecological knowledge into land management practices.**
- **Identify and prioritize ways that authentic consultation and co-management with Tribal stakeholders can be implemented.** This could be through management planning processes and collaboration in the creation of new Monuments and protected areas.
- **Address racist, misogynist, homophobic/transphobic, and culturally insensitive names of DOI-managed landmarks.** Honor the history of landscapes by consulting Native, Indigenous, and First Nations peoples in the renaming of major landmarks and peaks.

Additional Barriers to Access for Underserved Community Members

- **Lack of awareness or understanding exists as to what the land resource is, what it offers, and how to access various landscapes.** This could be how the resource came about and what the land designation means. Additionally, what affordable camping and recreation options exist for individuals and large groups in the front and backcountry, how to safely access the land and avoid trespassing, what activities take place on the landscape, and how and or when to obtain permits.
- **Perception of who belongs on public lands.** This is largely based on lack of representation in advertisements and informational materials as well as representation in fellow visitors.
- **Lack of diversity and representation in DOI staff.** From leadership to folks on the ground, the large majority of DOI staff are represented by individuals with racial and gender privilege.⁹ Continue to increase efforts of diversifying the DOI's workforce composition, and addressing biases that exist within the agency, in order to better represent all users.
- **Insufficient public transportation to access DOI landscapes, especially from urban landscapes.** Lack of reliable transportation whether it be a personal vehicle or public transit options, are a large limiting factor for visitation.
- **Fear of being profiled or harmed by staff, rangers, or other visitors.**
- **A perceived and existing lack of safety and security in rural gateway communities to potential visitors.**
- **Cost barriers to purchasing day or annual passes.**
- **Gatekeeping mentality deeply embedded within the culture of the agency and conservation movement as a whole.** Gatekeeping is the activity of controlling, and usually limiting, general access to something, and has been seen in the conservation movement through the assumption that new users are not adequately prepared to access a resource.

⁹Department of the Interior Workforce Composition <https://www.eeoc.gov/federal-sector/reports/department-interior-doi> (Accessed Nov 15, 2021)



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Q2 How can DOI remove or reduce barriers (e.g., update policies, practices, or programs) that underserved communities and individuals may face when they recreate or attempt to recreate on DOI-managed lands and waters?

One of the most impactful changes that DOI can implement is working towards increased fluency for the public in the understanding of how to access public lands responsibly whether this is through obtaining permits for group excursions, booking group campsites for gatherings, or knowledge surrounding first come first serve resources. Oftentimes users begin to navigate through the process, feel intimidated or run into capacity issues, and opt to utilize spaces they are more familiar with that require fewer logistics to reserve, for instance, state parks, city parks, and close-to-home front country areas. If affinity groups, members of underserved communities, or individual users do not have an understanding of how to access parks and public lands, they will not feel inclined to visit. The information must be accessible and easy to digest.

Recommendations for removal + reduction of barriers:

- **Work towards a culture shift in the agency among staff and leadership.** A cultural shift from exclusion and gatekeeping to inclusion and acceptance will proliferate amongst users of the landscape and in turn, create a more inviting and enjoyable experience for all recreationists.
- **Address internal staffing and capacity building.** Invest in expanding equitable hiring and recruitment processes within the agency. Ensure an equitable pay structure, mentorship opportunities, and adequate JEDI and implicit bias training in order to assist in changing agency culture and developing new leaders.
- **Acknowledge history and engage in renaming of peaks + monuments**
- **Collaborate with local law enforcement, government entities, and community groups in gateway communities.** Track, report on, and address violence or hate crimes occurring in these towns. While DOI can attempt to ensure the safety of visitors within their jurisdiction, it is imperative that groups are able to feel welcomed and travel safely through and access resources in gateway communities. This will require intentional collaboration with law enforcement, local government leaders, community groups, and tourism boards in gateway communities within close proximity of DOI managed landscapes.
- **Create genuine, longstanding partnerships with groups.** Addressed in Q3, see below.
- **Improve access to information including but not limited to:** user experience website improvements for DOI and recreation.gov, inclusion of robust accessibility information for individual park units, interpretive and translation services available in visitor centers and online.
- **Include education regarding the various user groups that access specific landscapes.** Offering more in-depth educational information regarding who an individual may see recreating on the land will enable users to inform whether or not they wish to access a certain area and will additionally help to avoid recreation user conflict. For example, sharing information such as how hikers and mountain bikers should yield on trails, when hunting season is taking place, and when trails are shared with OHVs can assist in reducing conflict.
- **Offer and advertise event spaces and group campsites for affinity and community groups.** Once partnerships with these groups are established (see below), ensure that groups are aware of



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resources that exist for hosting community gatherings. Once booked, inform fellow agency staff of groups' intended use and ensure they are welcomed into the space.

- **Utilize visitor centers as a safe, inclusive, and welcoming space for learning and asking questions.** Offer adequate resources for users of all abilities such as interpretive services, maps, and accessibility information of the landscape including descriptive explanations of the front and back country resources. Ensure that resources are offered in multiple languages.
- **Ensure adequate signage on DOI managed landscapes.** Lack of clear signage results in users feeling nervous to access public lands due to fear of trespassing. Ensure signage is located in areas that are accessible through clearly marked and visible structures like gates or cattle guards in order to inspire confidence in visitors and affirm that they are not trespassing.
- **Increase visible, culturally informed, interpretive staff presence on the ground.** First time or new users of public lands may feel nervous or have questions, ensuring there are adequate staff that are culturally informed located around the landscape will offer a sense of security and safety to users.

Q3 How can DOI establish and maintain connections to a wider and more diverse set of stakeholders representing underserved communities? What are the best ways to notify and engage underserved stakeholders about recreational opportunities?

Robust and Inclusive Stakeholder Engagement

Public lands are for everyone, and all people should have access to information about management decisions made on these lands. DOI's management and planning practices should be transparent and widely communicated in order to ensure the broader public has an opportunity to weigh in. Those who stand to bear the weight of decisions made on public lands must be prioritized when seeking input. This includes direct outreach to Tribal, Indigenous, and First Nations populations as well as other groups and frontline communities who have been historically left out of the conversation and in turn, negatively impacted by the actions taken by various agencies like DOI. In order to ensure inclusive stakeholder processes we believe DOI should:

- **Define and clearly communicate the roles and decision-making power held by stakeholders on a case to case basis.** Express clearly how much time will be required from an engagement process, as well as what role the individual stakeholders' engagement will play in how a final decision is formed.
- **Engage and consult with leaders and organizations representing underserved communities as decision makers, not just advisors to the management process.** There are many outdoor recreation nonprofits and organizations dedicated to bettering the experience of recreation in underserved communities, and they operate on different scales. For example, within the climbing community specifically, the two national organizations AAC and the Access Fund, both have affiliate groups operating in local communities. [Local Climbing Organizations](#) (LCOs) are ancillary groups of Access Fund and the AAC has [Sections and Chapters](#). In addition to these local groups, there are specific affinity groups working towards bettering outdoor recreation access for underserved



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communities such as [Brown Girls Climb](#), [Latino Outdoors](#), [Outdoor Afro](#), and [more](#). These groups often operate on national, regional, and local scales. DOI should keep track of groups engaging in equitable access work, and consult them as decision makers when possible.

- **Clearly define “stakeholder” in public engagement efforts to ensure input from a wide range of perspectives.**
- **Establish a transparent process to evaluate and publicly communicate decisions made about public lands.** This should include the rationale behind those decisions, and their implications for each individual stakeholder group.
- **Ensure that scoping periods and other opportunities for engagement are announced outside the Federal Register.** Including, but not limited to, sharing the comment opportunity in local news and radio announcements in rural communities, partner and affinity group listservs, and post and advertise widely online.
- **Offer various avenues for engagement.** Including, but not limited to, mail, email, web forums, phone, in person engagement opportunities, video conferencing, etc.
- **Ensure that engagement events are accessible and comfortable for all participants.** Provide the basic tools and services needed to do so, including but not limited to, translation, interpretation, refreshments, child care, and ample time and opportunity for all participants to be heard.

Build Authentic Partnerships with Groups

In addition to the work of ensuring that stakeholder engagement is well-rounded and inclusive, it is critical that DOI work to build authentic relationships and partnerships with affinity groups and community-centered organizations. While there have been efforts made to increase access to the outdoors through various grant and scholarship opportunities through programs like the Every Kid Outdoors program¹⁰, it would be meaningful for the agency to build trust and develop a relationship with the folks leading the charge in advancing equity in the outdoors. In order to build trust and develop meaningful relationships DOI must:

- **Create a consistent framework where stakeholder, affinity, and community groups know how they can individually or collectively engage in planning processes.**
- **Form authentic partnerships with core stakeholder groups and local leaders.** If done well, these relationships and the information that comes from them, can then trickle down into smaller, ancillary groups that are within their network allowing DOI to expand outreach.
- **Be open and transparent about how decisions have been made in the past.** Discuss DOI's willingness to grow and rectify harm caused to underserved communities in the past on a case by case basis.
- **Acknowledge that not all partnerships will require a formal process or MOU.** Many groups operate in a grassroots volunteerism capacity and therefore may not have the time nor resources to engage in the same way larger recreation nonprofit partners are. Be willing to meet groups where they are in order to increase engagement and partnership opportunities that work in DOI and said group's favor.

¹⁰FY 2021 Interior Budget in Brief (Feb 2020) <https://www.doi.gov/sites/doi.gov/files/uploads/2021-highlights-book.pdf>



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We appreciate DOI's demonstration of its approach to soliciting feedback from stakeholders in the various listening sessions held during the month of October, and hope to see this style of engagement and outreach continue. Our community is grateful for the opportunity to weigh in. As this process continues, we look forward to serving as a resource to DOI and welcome any further opportunity to be involved in assisting DOI in advancing access to recreation on public lands.

Respectfully,

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