

OUTDOOR ALLIANCE

March 7, 2022

Secretary Deb Haaland
Department of the Interior
1849 C St. NW
Washington, DC 20240

Submitted via regulations.gov

Re: Request for Information to Inform Interagency Efforts to Develop the American Conservation and Stewardship Atlas

Dear Secretary Haaland:

On behalf of the human powered outdoor recreation community, thank you for the opportunity to comment on the development of the American Conservation and Stewardship Atlas. 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 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.

Our organization comprises member groups that represent different ways of enjoying the outdoors, all of which depend on access to wild and natural public lands and waters. More specifically, our sports and modes of recreation are defined by interaction with unique natural landscapes, topographies, and climate conditions. The recreational pursuits we enjoy—climbing, paddling, mountain biking, backcountry skiing, surfing, and more—require the protection of the places we recreate. These pursuits also help participants to develop a deep and personal appreciation for the natural world, which is embodied in our community's long tradition of conservation advocacy.



OUTDOOR ALLIANCE

Outdoor Alliance and the outdoor recreation community are enthusiastic supporters of Conserving and Restoring America the Beautiful (CRAB) and the goal of protecting 30 percent of our country's lands and waters by 2030 (30x30). These goals will help to address three overlapping imperatives: stemming the loss of biodiversity, mitigating the climate crisis, and providing better and more equitable access to outdoor recreation opportunities.

We are excited about the potential of the Conservation Atlas to contribute to the goals outlined in CRAB. The Atlas will help establish a meaningful baseline for conservation efforts, and, ideally, will help direct and support those efforts by providing useful insights for land managers, local communities, lawmakers, and others involved in conservation efforts. This attribute—providing useful and actionable information that will help advance on-the-ground conservation—is, in our view, the most essential element of the Atlas. The Atlas can measure or depict the state of conditions for lands and waters with tremendous precision, but if that information does not lead to better outcomes on the ground, the exercise will be fruitless.

Further, it is essential that the Atlas cultivate information that will help deliver more equitable outcomes in terms of connecting Americans with the outdoors. Because of our country's history of racial discrimination, many communities have been systematically deprived of greenspace and access to the outdoors. Documenting these effects will be crucial to directing new conservation and recreation access opportunities and delivering on the promise of the CRAB initiative.

Finally, the Atlas should document data gaps or needs that could help inform future iterations. As an example, there is significant room for improvement in how visitor use data for public lands is collected. This data could, in turn, help to appropriately target areas that could particularly benefit from on-the-ground stewardship work, increased recreational opportunities, or better funding.

Our comments on the specific questions articulated in the request for information follow.

OUTDOOR ALLIANCE

Science and Data. *What data sources, standards, and technical approaches should be applied to data included in the Atlas to ensure that it is an authoritative and useful tool for the public?*

Developing the Atlas is a critical step in establishing a clear baseline that will allow land managers, lawmakers, local communities, and others to evaluate, prioritize, and measure progress towards the distinct goals in the Conserving and Restoring America the Beautiful initiative. A thoughtful and well-designed system should support a variety of users including land managers, Tribal Nations, scientists, stakeholders, and the public. On the front end, the Atlas should include an intuitive web-based interface that is easy to use by non-experts. On the back end, Atlas data should be open to the public and readily accessible for download and further analysis.

The U.S. Geological Survey (USGS) launched the GAP Analysis Program (GAP) in 1989, which led to the development of the Protected Areas Database of the United States (PAD-US). This robust database includes standards for classifying land cover and protected areas and documented methods to apply GAP information to everyday resource decisions and long-range planning. Expanding the utility of the PAD-US would be a logical step in its evolutionary progression, and there seems to be general consensus that GAP 1 and 2 status areas (and the marine protected area equivalents) are a sensible starting point towards establishing a baseline of conserved areas. However, while the PAD-US has evolved over the years, we envision several approaches that could build upon the current framework and be used to develop the full potential of the Atlas.

The Atlas should:

- Incorporate methodology to identify, monitor, and report Other Effective Area-based Conservation Measures;
- Include tools that help prioritize lands and waters for conservation based upon biodiversity levels, ecosystem carbon potential, and the potential to improve access to nature, particularly for historically excluded or underserved communities;
- Incorporate information from state and federal land management plans;
- Incorporate information on existing conservation areas from a variety of science-based sources;



OUTDOOR ALLIANCE

- Integrate conservation and ecological data from nongovernmental organizations (NGOs);
- Complement existing USGS web tools, like the Smart Energy: Landscape Analysis web tool, as companion resources; and
- Identify data gaps, research needs, and areas where information collection can be improved to inform future iterations of the Atlas.

The Atlas should incorporate methodology to identify, monitor, and report Other Effective Area-based Conservation Measures (OECMs).¹ Currently, the United States does not have any lands in the OECM system. In Europe, OECMs are being used as a new conservation approach, separate from protected areas, recognizing that biodiversity conservation might be an ancillary benefit of other land-management objectives. Developing or adopting OECM criteria offers an opportunity to embrace holistic, flexible, and inclusive approaches to conservation, while respecting Indigenous rights to current land-uses, understanding political realities, and accepting a diversity of governance approaches.

The Atlas should include tools that can help prioritize lands and waters for conservation based upon biodiversity levels and ecosystem carbon potential. There is a wealth of scientific data documenting the need for increased spatial targets² and multi-criteria spatial optimization approaches.³ While respecting the limitations of modeling, developing or adopting multi-criteria spatial approaches could assist land managers and the public in identifying lands and waters to prioritize for climate mitigation and biodiversity protection. Additionally, multi-criteria spatial approaches could help identify where existing protected lands are not serving their intended purpose of protecting biodiversity, water quality, and other ecological resources. This information is important for understanding where existing

¹ OECM Guidelines and Reports, available at <https://www.iucn.org/commissions/world-commission-protected-areas/our-work/oecms/oecm-guidelines-and-reports>.

² See, e.g., Eric Dinerstein, et al., A Global Deal For Nature: Guiding Principles, Milestones, and Targets, 5 Science Advances No. 4 (2019); Woodley, Stephen, et al. "Area-based conservation beyond 2020: A global survey of conservation scientists." Parks 25.2 (2019): 19-30; O'Leary, Bethan C., et al. "Effective coverage targets for ocean protection." Conservation Letters 9.6 (2016): 398-404.

³ See, e.g., Jung, Martin, et al. "Areas of global importance for terrestrial biodiversity, carbon, and water." bioRxiv (2020); Conservation Science Partners. 2021. Informing the identification and protection of public lands to help mitigate the impacts of climate change and biodiversity loss in the United States. Technical Report. Truckee, CA.



OUTDOOR ALLIANCE

protective designations alone are not effective for achieving the goals laid out in the CRAB report. Additionally, the Atlas should develop and implement methodologies to depict areas with inadequate access to nature, parks, and outdoor recreation opportunities, including demographic information to illustrate inequities and help establish baselines and metrics for improving equitable access to the outdoors.

The Atlas should incorporate information from state and federal land management plans. In the United States, federally managed public lands and waters will be an important tool for reaching the 30x30 goal. Under the principles of multiple use, the Bureau of Land Management (BLM) manages approximately 243 million acres and the U.S. Forest Service (USFS) manages approximately 191 million acres of public land. Given the multiple land use objectives on BLM and USFS managed lands (e.g. recreation, timber, conservation), the variety of ecological and environmental benefits that any given landscape might provide (e.g., carbon storage, wildlife habitat, ecological connectivity), and potential trade-offs among these co-benefits, the revision of land management plans will play an important role in prioritizing areas for climate mitigation, biodiversity conservation, and recreational access enhancement. Providing agencies the resources and tools they need to update outdated land management plans in support of conservation objectives is an essential step towards meeting the 30x30 goal.⁴

The Atlas should incorporate information on existing conservation areas from a variety of science-based sources. This includes the NOAA MPA Inventory⁵, which displays information on many marine protected areas (MPAs) in U.S. waters. This also includes other federal, state, commonwealth, Tribal, and local government sources that provide relevant information on ocean and land conservation areas under their jurisdiction. Regional ocean data portals (e.g., the Northeast Ocean Data Portal⁶) are another valuable source of geospatial information. Developed under the framework of the National Ocean Policy, regional ocean data portals

⁴ NFMA Planning Rule Schedule, available at <https://www.fs.fed.us/emc/nfma/index.shtml>. Currently, 52 out of 130 forest plans nationwide are more than fifteen years old. It is important to note that the Forest Service is currently operating under modernized planning regulations (36 C.F.R. Part 219) that emphasize many of the America the Beautiful initiative's core principles, while the BLM continues to operate under decades-old regulations that need to be revised.

⁵ U.S. Marine Protected Areas, available at <https://marineprotectedareas.noaa.gov/dataanalysis/mpainventory/mpaviewer/>.

⁶ Northeast Ocean Data, available at <https://www.northeastoceandata.org/>.



OUTDOOR ALLIANCE

house scientific data sets on managed areas, ecological resources, and recreational uses.

The Atlas should be able to easily integrate data from nongovernmental organizations (NGOs) and others by providing a clear geodatabase schema that allows spatial data to be contributed efficiently. This is a feature that PAD-US has expanded on over time, and many of the changes reflect improvements to agency and organization GIS systems and data. Recently, PAD-US version 2.1, has integrated more than 75,000 city parks in all 50 states (and the District of Columbia) from The Trust for Public Land's ParkServe⁷ data development initiative, adding nearly 2.7 million acres of protected area.

USGS Smart Energy Development web tools should be designed as companion resources to the Atlas.⁸ In particular, the Smart Energy: Landscape Analysis web tool provides information to facilitate energy siting decisions and informed decision making. However, the "Recreation and Visual" category group in the Landscape Analysis tool is currently empty. To ensure that judicious guidance exists for siting future energy development projects in a manner cognizant of other resource values, including recreation, the USGS should populate the Recreation and Visual category group with authoritative data from land managers. Both the USFS and BLM manage GIS data clearinghouses that publish a variety of authoritative recreation and visual datasets that could be incorporated into the web tool.⁹

Finally, the Atlas should identify data, currently unavailable, that would help facilitate conservation and outdoor access objectives. As an example, visitor use data for public lands and recreational resources are in need of significant improvement.¹⁰ Identifying these needs will help support land managers and others in developing these new data sets, which could better inform efforts to direct conservation and recreational infrastructure development efforts.

⁷Trust for Public Land's Parkserve, available at <https://www.tpl.org/parkserve>.

⁸ USGS Smart Energy Development, available at <https://sciencebase.usgs.gov/smartenergy/>.

⁹ See, Forest Service Geodata Clearinghouse, available at <https://data.fs.usda.gov/geodata/edw/datasets.php>; BLM Navigator, available at <https://navigator.blm.gov/home>.

¹⁰ Headwaters Economics report Innovative New Ways to Count Outdoor Recreation, available at <https://headwaterseconomics.org/outdoor-recreation/counting-outdoor-recreation/>.



OUTDOOR ALLIANCE

Conservation as a Continuum *How can the Atlas reflect the meaningful conservation work already underway in America?*

Because of the nature of the settings in which our outdoor recreational pursuits occur, the idea of conservation as a continuum has particular resonance for the outdoor recreation community. Recreationists deeply value the rare or once-in-a-lifetime opportunities to visit distant landscapes, but also the opportunities to recreate close to home, often in settings that see more use or have more of the impacts that come from proximity to development or population centers. The full breadth of this spectrum—from backcountry to frontcountry—has value: for the recreational opportunities these places support, for their ecological significance, and for their climate mitigation and adaptation benefits. To fully realize the benefits, both social and environmental, of the CRAB vision, the Conservation Atlas must account for the full range of landscapes that support outdoor recreation and environmental values, from urban parks to Wilderness areas.

As mentioned above, the existing USGS GAP provides a useful, but incomplete, starting point for establishing a baseline of protected lands and waters in the U.S. In order to fully reflect the meaningful conservation work already underway in America, the Atlas should build on these existing datasets to support a more holistic understanding of the conservation and recreation values provided by protected lands.

There are a large number of existing campaigns currently active across the U.S. that would protect important landscapes for values in line with the federal 30x30 initiative. The Atlas can add value to these meaningful conservation efforts by providing geospatial data that helps the administration, Congress, and the public better understand their potential contributions to biodiversity, carbon storage, climate mitigation, and outdoor access. In this way, the Atlas can serve as a tool to help evaluate legislative proposals and other campaigns that may contribute to 30x30.

The Atlas should also reflect the meaningful conservation work that occurs through federal land management planning, as well as the valuable data generated through plan development and monitoring, including through USFS Forest Plan and BLM Resource Management Plan revisions. Agencies are required to inventory potential



OUTDOOR ALLIANCE

protected areas during the land management planning process and are able to consider highly localized concerns, like important recreation sites, while developing conservation designations. These delineations reflect meaningful assessments of the conservation, recreation, and other resource values on these lands and waters and are often crucial building blocks for legislative or administrative protective determinations. The determinations made through planning are generally not available through a single, consolidated data source, however, and making these pieces of information more accessible will facilitate better management and more informed decision-making in a variety of contexts. Important administrative designations achieved through land management planning include:

- Eligible Wild and Scenic Rivers;
- Backcountry Management Areas (including areas with Inventoried Roadless Areas);
- Research Natural Areas;
- Special Interest Areas (managed to maintain their unique special character or purpose);
- National Scenic Trail corridors;
- Cultural and Heritage Corridors;
- National Scenic Areas;
- Recreation Emphasis Areas or Special Recreation Management Areas;
- Designations under the Recreation Opportunity Spectrum, a system used by land managers to describe recreational opportunities, experiences, and uses of public lands;
- Recommended Wilderness Areas;
- Old Growth Forest Areas;
- Timber Suitability; and
- Wildlife Management Areas.

Additional important designations to consider—beyond GAP 1 and 2—include Inventoried Roadless Areas, National Recreation Areas and other legislative designations, and Outstanding Resource Waters (Tier III waters under the Clean Water Act), as well as state designations like State Scenic Waterways and State Wild & Scenic Rivers. Designations made through Forest Service or BLM travel management processes are also significant determinations affecting resource protection and user conflict.



OUTDOOR ALLIANCE

In addition to information on conserved areas, the Atlas should be designed to improve federal decision making around development activities on federal lands, especially where these activities may be in tension with biodiversity, climate, outdoor access, and other 30x30 goals. Examples include energy development, hard rock mining, road development, and commercial logging. The Atlas can improve planning around these activities by showing where potential development projects overlap with areas of interest for the 30x30 initiative. For example, the Atlas should include information about the status of lands as they relate to oil and gas leasing in order to identify where potential future lease sales may overlap with important recreation or conservation values. In this way, the Atlas can help identify where federal actions outside of the GAP framework—mineral withdrawals, for example—might contribute to 30x30. As mentioned in the Science and Data section, the existing USGS Smart Energy Development web tools provide a starting point for energy-related data that could be included in, or further developed alongside, the Atlas.

Stewardship actions. *What stewardship actions should be considered, in addition to permanent protections, to capture a more complete picture of conservation and restoration in America?*

Outdoor Alliance commends the inclusion of land stewardship information in the Atlas. Experiencing healthy, functioning ecosystems is an important part of the outdoor recreation experience, and during our time outdoors, members of our community benefit greatly from connecting to the ecosystems that inhabit public lands and waters. The term “stewardship actions” should include both land management strategies that improve the function, composition, structure, and resilience of ecosystems, as well as actions that improve access to the outdoors and the quality of the outdoor recreation experience. These stewardship outcomes—healthy ecosystems *and* access to sustainable outdoor recreation for all people—are reflected strongly in the recommendations and principles outlined in the CRAB report. Our hope is that the stewardship information included in the Atlas will both reflect the efforts currently underway by the outdoor recreation community, and will help facilitate a holistic approach to stewarding the lands and waters protected under the 30x30 initiative.



OUTDOOR ALLIANCE

Including land stewardship information in the Atlas should help facilitate a better understanding among land managers, Congress, and the public, of the scale of the land management challenges present across our public lands, as well as the resources needed to actually address these challenges. This information can help inform more strategic future actions, such as appropriations requests from land management agencies and allocations to grant programs that support stewardship work from non-federal partners.

While not a comprehensive list, the sections below outline a set of key stewardship actions that are important to the outdoor recreation community. The Atlas should include information about past, ongoing, and needed work related to these activities, and should include metrics for how progress on these stewardship goals will be reported and tracked wherever possible. As mentioned in the Science and Data section, the Atlas should be designed so that stewardship data can incorporate information from the outdoor recreation community and other non-federal partners.

Recreation stewardship: Members of the outdoor recreation community, including Outdoor Alliance member organizations, play an important role in stewarding recreation resources through actions like trail maintenance, volunteer organizing, waste removal, and climbing area management. In many cases, these actions can improve both conservation and recreation outcomes and draw needed volunteer resources to public lands. For example, maintaining and re-routing trails where needed can protect sensitive habitat while enhancing the outdoor recreation experience. Metrics that could be used to track the progress of these stewardship actions include miles of trail maintained, restored, or constructed; pounds of trash removed; and number of volunteer hours completed on stewardship projects. Additional metrics should include deferred maintenance needs for recreation resources.

Dam removal: Removing dams where social or environmental costs exceed benefits provides an opportunity to simultaneously restore free-flowing rivers, improve biologically rich riparian habitats, and improve the outdoor recreation experience. In some cases, dam removal projects also can have significant climate benefits through reductions in methane emissions and by making rivers themselves more resilient to climate change. The Atlas should facilitate reasoned decision-making on



OUTDOOR ALLIANCE

dam removal by including information about dam locations, successful dam removals (see Science and Data section above), retired hydropower projects, and hydropower relicensing.

Wildfire resilience: The outdoor recreation community is increasingly affected by severe and destructive wildfires, as well as hazardous smoke emissions. Many of our nation’s most iconic recreation designations—particularly in the west and southeast—lie within highly fire-adapted ecosystems that have been altered by more than a century of fire suppression, logging, and development. As such, we support stewardship actions that restore fire resilience to public forests, particularly when they are designed to enhance biodiversity, recreational, and cultural resources. These actions include prescribed fire, cultural burning, wildfires managed for resource objectives, and mechanical treatments that retain larger trees and account for the needs of sensitive species. We also support climate-smart reforestation efforts that take into account the natural fire regime of a replanted area. To facilitate these stewardship actions, the Atlas should include an inventory of areas in need of additional management activities, as well as areas where these activities have occurred.

Watershed Restoration: Many rivers, streams, and other waterways most prized by the outdoor recreation community lie in watersheds that have been heavily degraded by grazing, mining, and other activities that threaten water quality. Legacy mining damage, for example, affects outdoor recreationists in a number of ways, including through discharge of mercury, acid mine drainage, and other contaminated sediments into waterways. These pollutants can create hazardous conditions for recreationists like whitewater paddlers. The Atlas should include information about watershed restoration needs that will help prioritize and facilitate needed restoration efforts. The existing list of impaired waters, compiled in accordance with Section 303(d) of the Clean Water Act, provides useful information assessing where these stewardship actions are most needed.

Oil and gas wells: Plugging and cleaning up abandoned oil and gas wells is an important component of remediating legacy impacts from misguided energy development on public lands and addressing their ongoing climate impacts. The Infrastructure Investment and Jobs Act provides \$4.7 billion for addressing

OUTDOOR ALLIANCE

abandoned oil and gas wells. The Atlas should include information about the locations of abandoned wells to help facilitate their cleanup.

Attributes. *What are the attributes of lands and waters that should be included in the Atlas?*

In addition to ecological and climate resilience attributes, the Atlas should include information about important outdoor recreation sites, including river access points, trails, developed climbing areas, beach access points, and recreation-focused land designations. Incorporating these sites into the Atlas has the potential to guide 30x30 conservation efforts in a way that benefits both conservation and equitable access and also accounts for forms of human-powered recreation that may require a rare or specific type of natural feature (a whitewater paddling run, for example).

The Atlas must also reflect the value of lands for facilitating equitable access to the outdoors. The ongoing COVID-19 pandemic and growing popularity of outdoor recreation have highlighted the need for more close-to-home recreation opportunities. The Atlas should depict communities, as well as landscapes, and include data that will help to support efforts to provide better recreation opportunities for parks-deprived communities. By identifying important—or potentially important—recreation resources that are or could be accessible to low income and environmental justice communities and population centers, the Atlas can help identify how gaps in outdoor access could be closed. This information can help inform policy decisions and resource allocations that affect people’s ability to access outdoor recreation. The Atlas should also consider the extent to which transportation to and from public lands presents a barrier to access. This analysis might build on the existing Parkscore Index created by the Trust for Public Land.

Contributions. *How can the Atlas best reflect the contributions of State, local, Tribal, territorial, and private lands?*

State, local, and private lands provide some of the best outdoor recreation resources in the country and also play a role in influencing natural processes that cross ownership boundaries. Wherever possible, the Atlas should include data and information that covers non-federal lands so that land managers, land owners, and others can make better, more holistic management decisions. Importantly, some



OUTDOOR ALLIANCE

regions of the country, including parts of the east and midwest, lack significant federal public lands acreage, and conservation of private lands in these areas must be a priority. For the outdoor recreation community, some examples of high priority private lands include privately-owned or closed climbing areas, river access points, parking areas, and parcels that would connect or provide access to existing public lands. By including these areas in the Atlas, land managers can more strategically allocate conservation funding through sources like the Land and Water Conservation Fund.

Outcomes. *How can the Atlas best reflect land and water contributions to biodiversity, climate change mitigation and resilience, and equitable access to nature and its benefits?*

As the initial tool that the federal government will use to identify a baseline of protected areas and track progress towards protecting 30 percent of U.S. lands and waters by 2030, it is critical that the Atlas be designed in a way that actually increases the pace, scale, and impact of conservation efforts throughout the country. In this sense, meaningful actions on conservation, climate, and recreation priorities *are* the primary outcomes that we hope to see arise from the process of developing the Atlas. The Atlas should be designed and updated in a way that helps land managers, Congress, the administration, and other entities identify the highest conservation priorities and provides the best available science to support decision-making.

With regard to land protection, the Atlas should provide the scientific information necessary to guide land conservation efforts at the administrative level. These administrative efforts include conserving areas through land management plan revisions, making needed administrative designations, improving environmental analysis, and resetting the role of oil and gas development. For stewardship actions, the Atlas should help the administration, Congress, and the public understand the scale of the management challenges present across our public lands, as well as the investments actually needed to address them. In this way, the Atlas can inform resource allocations within the federal agencies and guide future appropriations requests and shared stewardship initiatives. For example, by including accurate information about the number and location of dams that are no longer providing



OUTDOOR ALLIANCE

important public benefits, the Atlas can inform future agency actions related to dam removal and restoration.

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Conserving and Restoring the America the Beautiful and the goal of protecting 30 percent of America's lands and waters by 2030 are important and inspiring objectives. The outdoor recreation community is enthusiastically supportive and appreciative, in particular, of the recognition that addressing the decline in nature, mitigating the climate crisis, and providing better opportunities for Americans to connect with outdoors are goals to be pursued in mutually supporting and holistic fashion. The Conservation Atlas presents an important opportunity to develop a baseline for where we currently stand as a country: with regard to conservation of nature and opportunities—and inequities—around how it is experienced. Pivotaly, the Atlas must be oriented to support specific, meaningful, on-the-ground measures to establish protections, restore degraded landscapes, and provide opportunities for outdoor recreation. The Atlas will be a success to the degree that it helps support concrete steps that lead to these outcomes.

Outdoor Alliance and the outdoor recreation community appreciate the opportunity to provide comments on the development of the Atlas, and we look forward to continuing to work with you in support of conservation and equitable and sustainable recreation access.

Best regards,



Louis Geltman
Policy Director
Outdoor Alliance

cc: Adam Cramer, Chief Executive Officer, Outdoor Alliance
Chris Winter, Executive Director, Access Fund
Beth Spilman, Executive Director, American Canoe Association
Mark Singleton, Executive Director, American Whitewater



OUTDOOR ALLIANCE

Kent McNeill, CEO, International Mountain Bicycling Association

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