

COALITION FOR OUTDOOR ACCESS

October 16, 2017

The Honorable Ryan Zinke
Secretary, U.S. Department of the Interior
1849 C Street NW
Washington DC 20240

Dear Secretary Zinke:

The Coalition for Outdoor Access respectfully submits these comments on the permitting components of Secretarial Order 3356, issued by the Department on September 15, 2017.

The Coalition for Outdoor Access is an alliance of organizations with an interest in the outfitter-guide permitting systems of the federal land management agencies. The Coalition came together in 2014 to try to improve the operation of these systems for the full spectrum of outdoor leaders who provide recreational experiences on federal lands and waters. The Coalition is made up of organizations that represent for-profit outfitters and guides, nonprofit outfitters and guides, university recreation programs, volunteer-based clubs, the outdoor industry, and the conservation advocacy community.

In general, the Coalition applauds the Order's interest in promoting recreation on DOI lands and waters, although we confine our specific comments to section 4(b)(5) of the order relating to recreational outfitter-guide permitting.

We strongly support efforts to improve the permitting process for outfitters and guides on Department lands and waters. This process has historically been difficult to navigate for outdoor leaders who want to take people out on public lands. Focused attention by the Department on the improvement of this process would increase guided recreational opportunities.

We also support efforts to increase access for nonprofit organizations that provide outdoor experiences to youth, veterans and underserved communities. Nonprofit organizations play an important role in connecting these communities to the outdoors. Providing additional opportunities for nonprofit organizations to offer their services will generate health benefits for veterans, increase physical activity for children, and enable historically underserved to develop a valuable connection to America's public lands and waters.

At the same time, we urge the Department to be cautious about developing a distinct permitting process for any segment of the outfitter-guide community. Setting up a separate process for certain types of outdoor leaders could result in disparate treatment that would favor one group over another. It would also work against the intent to streamline and improving the process by adding layers of complexity and subjecting groups to different standards. The Coalition for Outdoor Access believes all types of outfitters and guides should be treated equally and provided equal access. This includes both for-profit and nonprofit

organizations. For these reasons, we think creating different processes could have adverse consequences.

We also urge the Department to streamline the permitting process carefully so that DOI's agencies have the tools they need to ensure that the lands they manage remain attractive recreation destinations for a wide range of users. We also believe it is important to preserve opportunities for the recreating public to participate in decisions about the way the Department's lands and waters are managed.

With these considerations in mind, we want to express our appreciation for the Department's efforts to improve the outfitter-guide permitting system. We plan to provide the Department with additional input when we have had a chance to review the Department's recommendations.

Regards,

Submitted on behalf of the Steering Committee of the Coalition for Outdoor Access:

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