

# Inflation Reduction Act: Outdoor Recreation Community Recommendations for Conservation and Restoration Funding

This memorandum summarizes the recommendations of the human-powered outdoor recreation community regarding the implementation of key provisions of the Inflation Reduction Act of 2022 (hereafter "IRA") at the Department of the Interior (DOI), the United States Forest Service (USFS), and the National Oceanic and Atmospheric Administration (NOAA).

#### **Summary of Recommendations**

The IRA represents the most significant action ever taken by the U.S. to address the climate crisis. The bill includes close to \$370 billion in investments intended to reduce greenhouse gas emissions, promote clean energy, and make U.S. lands, waters, and communities more resilient to climate change. This includes billions of dollars for addressing conservation, restoration, and climate resilience priorities at federal land management agencies, which, if allocated strategically, can also support wide-ranging benefits for outdoor recreation, the \$689 billion outdoor economy, and the landscapes, clean air, and waterways that recreationists value.

The human-powered outdoor recreation community is eager to see IRA funds put into action to support natural climate solutions and other land management priorities. This memo includes our community's top line recommendations for how federal agencies can implement key IRA programs in a way that supports recreation values. These recommendations include:

- Prioritize IRA climate adaptation and conservation funds funding for projects that have co-benefits for outdoor recreation and equitable access to nature.
- Address staffing and capacity issues at federal land management agencies including the National Park Service, Bureau of Land Management, and the Forest Service.
- Provide clarity and transparency for stakeholders on project selection criteria, and, where possible, solicit stakeholder input to inform project selection.
- Align IRA implementation with America the Beautiful and other federal conservation initiatives.





















These recommendations are outlined in more detail below.

#### **About Outdoor Alliance**

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.

## Sections 50221 and 50222: National Parks and Public Lands Conservation, Resilience and Ecosystem Restoration (NPS and BLM)

Public lands managed by the Bureau of Land Management (BLM) and National Park Service (NPS) comprise many of America's most iconic outdoor recreation destinations and help support the growing \$689 billion outdoor recreation economy. Due in part to decades of underinvestment, these agencies face staffing and resource challenges that have left them unable to meet modern land management needs related to recreation, conservation, and sustainability.

Together, Sections 50221 and 50222 allocate \$500 million to DOI over ten years for ecosystem and habitat restoration projects and to support the conservation, protection, and resiliency of NPS and BLM lands. These funds hold the potential to significantly improve these agencies' ability to address climate change and associated ecological impacts to public lands and waters, as well as impacts to the recreation experience. We offer the following recommendations to support DOI's prioritization of IRA restoration funds:

• Align IRA implementation with the America the Beautiful Initiative: The outdoor recreation community strongly supports the Biden administration's America the Beautiful Initiative (AtB), including its goal of protecting 30% of U.S. lands and waters by 2030, as well as the list of core principles outlined in





















the Conserving and Restoring America the Beautiful Report. The IRA provides an important opportunity to put AtB priorities into action, including by funding restoration and conservation projects identified through the forthcoming American Conservation and Stewardship Atlas. The AtB initiative appropriately acknowledges that equitable access to outdoor recreation is a key objective and co-benefit of conservation and restoration activities, and improving outdoor access should be a guiding principle for IRA implementation.

- Allow for transparency and public input in project selection: As frequent visitors to public lands and waters, members of the outdoor recreation community are often the first to notice ecological impacts and impacts to recreation resources like climbing areas, river access points, and trails. Our community is interested in how DOI plans to prioritize projects funded through the IRA and would welcome the opportunity to provide input to help inform the project prioritization process. We recommend that DOI make selection criteria for IRA funds publicly available and allow for public input prior to project selection.
- Align IRA conservation actions with recreation access: Well-designed recreation access and infrastructure projects can contribute to restoration goals, as well as to the conservation, protection, and resilience of public lands, especially when those projects achieve co-benefits related to water quality, scenic integrity, and other conservation goals. Projects that create a welcoming and inclusive means of experiencing public lands also support public engagement and foster a sense of stewardship for public lands and waters. We recommend that DOI consider recreation projects, such as trail restoration or river access infrastructure projects, as eligible for IRA funds under Sections 50221 and 50222. We also recommend that DOI prioritize projects for IRA funding that provide dual benefits for outdoor recreation and conservation values.
- Address staffing issues at BLM: Section 50223 (see below) of the IRA provides \$500 million to NPS to address ongoing capacity issues related to agency staff. While we applaud the effort to address staffing at NPS, we also see a need for IRA funds to support staff capacity at BLM. At a minimum, funds are needed to support planning and other administrative tasks related to IRA implementation.



















<u>Leverage support from partner organizations</u>: In many cases, partner organizations are well-positioned to complete restoration and stewardship work on public lands and waters. We recommend that DOI allocate a portion of the funds under Sections 50221 and 50222 to support grants to partner organizations, including the outdoor recreation community.

### Section 50223: National Park Service Employees

Section 50223 provides \$500 million to the NPS over ten years to "hire employees to serve in units of the National Park System or national historic or national scenic trails administered by the National Park Service." We are hopeful that this funding can be expeditiously put into action to address chronic staffing issues at the NPS, including for recreation and planning staff, as well as resource specialists like biologists and landscape architects. We also recommend that DOI explore whether these funds can be used to address housing and other hiring barriers within the NPS.

# <u>Section 50233</u>: Drought Mitigation in Reclamation States (Bureau of Reclamation)

Section 50233 provides \$4 billion to the Bureau of Reclamation (BOR) to mitigate drought impacts in Reclamation States, with priority given to projects in the Colorado River Basin and other drought-affected areas. We applaud the IRA's inclusion of substantial funding for addressing drought impacts, which will not only help maintain the system, but, if implemented thoughtfully, will enhance critically important environmental and recreation values that depend on the Colorado River and its tributaries. This funding, deployed jointly with the Western Water funding from the Infrastructure Investment and Jobs Act, will be integral to ensuring the West comes into balance with the decreasing water supplies and to protect and restore the rivers that sustain vibrant communities and support the recreation economy. In order to ensure that multi-use benefits are realized in project implementation, we ask the Bureau of Reclamation to:

 Expeditiously provide clarity and guidance on the scope of the funding, including criteria for projects and who is eligible to apply for funding. We encourage BOR to promote diverse projects that address a broad definition





















of "drought" and to fund all stages of a project. Additionally, we would like to see a broad definition of "public entity" be used to help with capacity and distribution of funds through a transparent process with flexibility in matching fund requirements. NGOs have the capacity and expertise to act as project managers, partners, and advisors on water conservation projects and can help ensure that multiple benefits for environmental and recreational values are met.

- Prioritize and incentivize compensated system conservation projects that boost streamflows and provide for long term conservation solutions that commit water to rivers to meet recreational and environmental flow needs. Water conservation projects that keep water in the river have the potential to enhance ecological and river recreation values, but only if projects intentionally consider the timing and quantity of flow needs for these nonconsumptive values. Reclamation should provide streamlined funding for infrastructure update projects using IIJA funds to access IRA funding.
- Require all project applicants to include a quantitative assessment of how the proposed project will affect environmental and recreational values and provide applicants with expertise and technical support if needed.
- Ensure that system conservation programs do not cause injury to Tribal water rights and supplies and ensure that Tribes are fully and fairly compensated for voluntary water conservation measures.
- Coordinate with other DOI agencies (NPS and BLM) to optimize reservoir management to benefit agency identified recreational and environmental values. Many rivers running through DOI-managed lands have resource management plans or enacted legislation that define flow-related recreation and environmental values and, in some instances, federally reserved water rights to protect and enhance those values. Projects that provide in-stream flows that support those values should be prioritized.
- Prioritize projects that keep water within its basin of origin and do not divert it for consumptive use.

# <u>Section 23001</u>: National Forest System Restoration and Fuels Reduction Projects

Section 23001 provides \$1.8 billion for hazardous fuels and vegetation management projects on Forest Service lands, as well as an additional \$200 million





















for fuel reduction projects in priority watersheds, and \$50 million for identifying and protecting old growth forests. These funds, combined with funds from the Infrastructure Investment and Jobs Act, provide an unprecedented investment in hazardous fuels reduction, prescribed fire, and related forest restoration activities on Forest Service lands, particularly in the Wildland Urban Interface (WUI). In many cases, these projects will be occurring in heavily recreated landscapes, as much of the outdoor recreation that occurs on Forest Service lands occurs close to where people live—in the WUI. To ensure that these projects support outdoor recreation opportunities, USDA should prioritize IRA restoration and fuels reduction projects to:

- <u>Identify and enhance recreation areas and opportunities within IRA-funded</u> fuel reduction projects: It is important to understand where and how outdoor recreation is occurring within the areas identified as Initial Landscape Investment Areas in the USFS 10-year Wildfire Crisis Strategy in order to protect and enhance outdoor recreation when conducting fuels treatment and vegetation management projects. The list of initial landscape investments includes multiple areas—such as the Colorado Front Range or the Central Oregon Cascades—that include nationally-significant trails, climbing areas, and other recreation resources, and that also support thriving local outdoor recreation economies. The USFS should commit to protecting and enhancing these resources through IRA-funded hazardous fuels projects, including by identifying recreation resources like trails during project analysis. Additionally, in many instances, fuels and vegetation management projects can have side benefits for outdoor recreation, such as thinning forests to enhance backcountry ski terrain. We recommend that the USFS coordinate with local recreation organizations to identify these opportunities during hazardous fuels projects.
- <u>Invest in the USFS prescribed fire workforce</u>: The USFS 10-year Wildfire Crisis Strategy appropriately recognizes prescribed fire as an essential tool for forest restoration. Research has shown that, in many seasonally dry forests, fuel reduction projects are most effective at reducing fire severity when they incorporate prescribed fire,<sup>1</sup> but that prescribed fire is underutilized in the

<sup>&</sup>lt;sup>1</sup> Susan J. Prichard, et al., *Adapting western North American forests to climate change and wildfires: 10 common questions*, 31 ECOLOGICAL APPLICATIONS No. 8, 28 (2021). Available at <a href="https://doi.org/10.1002/eap.2433">https://doi.org/10.1002/eap.2433</a>.





















western U.S.<sup>2</sup> Research has also identified constraints on workforce capacity as the primary barriers to increasing the pace and scale of prescribed fire in the western states.<sup>3</sup> Combined funding from the IRA and the IIJA provides the USFS with a once-in-a-generation opportunity to address these ongoing capacity issues. We recommend that the USFS prioritize IRA funds for prescribed fire planning and implementation, and where appropriate, use these funds for training, hiring, and other related investments in prescribed fire workforce capacity.

- Work with partner organizations: Local outdoor recreation organizations can help the Forest Service identify opportunities where recreation and fuels treatment opportunities align and can help the Forest Service develop projects that either mitigate impacts to, or improve opportunities for, outdoor recreation in concert with fuels reduction goals.
- Implement U.S.D.A. Secretary's Memorandum 1077-004: The 2022 USDA Secretary's Memo titled "Climate Resilience and Carbon Stewardship of America's National Forests and Grasslands" outlines a series of principles and actions intended to enhance carbon sequestration on National Forests and Grasslands and to help adapt these lands to climate change. We ask that the USFS expeditiously put these goals into action in order to inform how IRA funds can be spent most strategically. For example, the memo calls for updating the USFS Fireshed Risk Map with additional layers to reflect ecological values as well as wildfire threats to underserved and socially disadvantaged communities. Making this change will help the USFS make better informed decisions related to IRA funds.

## **Section 23003**: State and Private Forestry Conservation Programs

Section 23003 provides \$700M for competitive grants to states through the USFS Forest Legacy Program for voluntary conservation of private forestlands. It also provides \$1.5 billion to the USFS Urban and Community Forestry Program for grants to states, local governments, tribes, and NGOs for tree planting and urban

<sup>&</sup>lt;sup>3</sup> Courtney A. Schultz, Sarah M. McCaffrey, and Heidi R. Huber-Stearns, *Policy barriers and opportunities for prescribed fire application in the western United States*, 28 INTERNATIONAL JOURNAL OF WILDLAND FIRE No. 11, 874 (2019). Available at <a href="https://doi.org/10.1071/WF19040">https://doi.org/10.1071/WF19040</a>.



















<sup>&</sup>lt;sup>2</sup> Crystal A. Kolden, *We're not doing enough prescribed fire in the Western United States to mitigate wildfire risk*, 2 FIRE No. 30 (2019). Available at <a href="https://doi.org/10.3390/fire2020030">https://doi.org/10.3390/fire2020030</a>.



forestry. We applaud these allocations, which will help to preserve open space and improve or create greenspaces within communities. Both of these programs are important for achieving the administration's America the Beautiful Initiative goals, and are essential tools for protecting landscapes and places that provide high value recreation and conservation opportunities. We recommend that the Forest Service consider recreation values, including dispersed recreation, as part of determining which lands to prioritize for purchase or conservation easement through the Forest Legacy Program. Likewise, we encourage USFS to consider how tree planting and urban forestry programs can improve outdoor recreation opportunities within target communities. Greenspaces within urban areas provide critical opportunities for people to connect with nature in their own communities and are essential to improving the quality of life for all Americans. Improved funding for the Urban and Community Forestry Program through the IRA presents an opportunity to greatly expand this program's benefits and to address ongoing inequalities related to park and open space access for disadvantaged communities and communities of color.

## Sec. 40001: Investing in Coastal Communities and Climate Resilience

Section 40001 provides \$2.6 billion to NOAA for the "conservation, restoration, and protection of coastal and marine habitats, resources, Pacific salmon and other marine fisheries, to enable coastal communities to prepare for extreme storms and other changing climate conditions, and for projects that support natural resources that sustain coastal and marine resource dependent communities, marine fishery and marine mammal stock assessments, and for related administrative expenses." We applaud this historic investment in our coastlines and strengthening their resilience to a changing climate. To have the greatest impact we recommend that the following investments are considered:

- Blue carbon ecosystems, such as mangroves, salt marsh, and seagrass meadows, are prioritized when considering habitat restoration and codified protections.
- Fund NOAA's National Marine Sanctuary Program to provide for adequate monitoring, management and enforcement of current protected areas, as well as future expansion and designation of sanctuaries.
- Fund NOAA's Coastal Management Grants ("Coastal Resilience") Program, Coastal Zone Management & Services, and National Sea Grant College.





















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