



Cottonwood Gulch Expeditions

Written Statement for House Committee on Natural Resources
Subcommittee on National Parks, Forests, and Public Lands
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Introduction

Cottonwood Gulch Expeditions is honored to submit testimony in support of both the SOAR Act and the Recreation Not Red Tape Act. These acts would vastly simplify the federal permitting process for our organization to access federal lands, help to remove barriers we face in getting youth outdoors, and refocus federal land managers on outdoor recreation. Their passage would help us achieve our mission of engaging youth in the outdoors and inspiring the next generation of leaders in outdoor recreation, policy, and sustainable management.

Cottonwood Gulch is a nonprofit 501(c)(3) that has run educational wilderness expeditions and outdoor programs in the American Southwest since 1926. Today, we operate ten open enrollment summer expeditions and partner with twenty five to thirty schools. Over half of our school programs mostly work with New Mexican Title I students. Over 60% of the youth we serve receive direct scholarship from our program, and all of our programs are subsidized by fundraising and donations which support our operations. In addition to our open enrollment and school programs, we have two government-funded programs, a Youth Conservation Corp (YCC) and an Every Kid Outdoors (EKO) program.

As the head of a nonprofit, I don't need to tell you that every dollar matters. The number of children and families we can serve depends on how efficient we can be with our time and resources--and passage of the SOAR Act and the RNRT Act would substantially affect how many youth we are able to get outside. Today, we need a full-time, year-round staff person whose primary role is to navigate government permitting processes. Enabling our team to spend more time grant writing, partnering with teachers, and improving our programs would be much more valuable to our organization and to the youth we bring outside. This written testimony contains five sections. First, it will introduce you to the programs that make Cottonwood Gulch a unique stakeholder in this area of regulation. Second, it will discuss our programs that specifically address the access gap that exists for youth getting outdoors. Third, it will detail our current experience with federal land management and permitting processes. Fourth, it addresses how various provisions within the SOAR and RNRT Acts would affect the Gulch. Finally it will identify challenges that will remain even after the passage of these bills.

Program History

Cottonwood Gulch Expeditions operates educational wilderness expeditions and outdoor programs in the American Southwest that promote personal growth and scientific, historic, and cultural discovery. The Gulch was founded in 1926--just ten years after the National Park Service--by a schoolteacher from Indianapolis named Hillis Howie. Howie heard that Route 66 was going to be paved, and predicted that it would change the physical and social landscape of the American West forever. Wanting his students to experience the wilderness, art, culture, science, and nature prior to that change, he set out with a group of teenagers to explore--to see what they could see. Perhaps he had a more detailed plan than "return before school starts," and perhaps he didn't. In 1934, Cottonwood Gulch led its first all-female Expedition, the Turquoise Trail. The opportunity afforded teenage girls to live outside, relying on themselves and each other to set up tents, cook over an open fire (no matter the weather), and learn to live together was unique for that time and our alumni from the Turquoise Trail still talk about about the camaraderie and freedom they felt at the Gulch. When many of our alumni from the early days of Cottonwood Gulch talk about what it was like, they note the spirit of adventure, the sights that have stuck with them through many decades, and the inspiration to pursue their eventual careers.

Alumni of our program include astronomers, ornithologists, geologists, musicians, authors, and biologists who point to their teenage experience at Cottonwood Gulch as one of the pivotal moments in determining their eventual careers. While we no longer depart the midwest on trains and take ten weeks to explore wherever the wind takes us, the spirit of adventure, incredible sights, and deep dives into the culture and science of the Southwest remain essential to our program. And that spirit is more important than ever today--while in 1926, camping, hiking, fishing, hunting, and outdoor recreation was a regular part of almost all American family life, today we often find ourselves working with youth who have never been camping or hiking.

Since the early days, Cottonwood Gulch has made an effort to make our program accessible to families who cannot afford to send their teen away for the summer. More recently, we have made it part of our goal to address the "access gap" in outdoor education by expanding scholarships for our summer program, pursuing grant funding for Title 1 schools, and providing employment opportunities to local New Mexican youth. Each year, more than half of our open enrollment youth receive scholarships, and this year, more than two-thirds of our school program participants will receive financial aid. In the past few years, addressing the access gap has become more of a focus for our organization than ever before.

Since our program started, access to public lands has become more restricted, more complicated, and more expensive. Obviously, public agencies have greater costs and more land to manage now than they did in the early 1900's; our programs have grown and our programmatic priorities have shifted over time as well. However, the more barriers we face, the less we will be able to remove barriers to outdoor recreation access for communities who have historically been marginalized and/or excluded by the outdoor community. In the first few decades of our organization, it was relatively easy for a group to find an interesting spot and pull off and set up camp. As more individuals and organizations of all types have begun to utilize public lands, the need for increased management has become obvious. And while Cottonwood Gulch supports and understands land management agencies' need to control access, the permitting process as it stands is so cumbersome that it has become fundamentally ineffective.

Cottonwood Gulch Programs that Address the Access Gap

In the spring of 2014, after a campfire for a group of 25 middle schoolers from Van Buren Middle School in the South Valley of Albuquerque, a student walked out from under a structure and stopped dead in his tracks. I was behind him, and asked if everything was okay. He was staring up at the skies above us, admittedly one of the more impressive nights I've ever seen, with pinpricks of light coming from millions of stars and a nearly new moon just rising on the horizon. This student was in 7th grade; about 13 years old. He pointed up towards the Milky Way, his hand cutting through the blanket of darkness and stars overhead, and said "What are those? Are they stars?" I was dumbfounded, and stumbled over saying, "Yes, of course they are." He looked over his shoulder at me and then back up, even more dumbfounded than I was. He stared for a moment, and then said, "I've never seen them. My mom doesn't let me out because she says it's not safe at night and there's a street light outside my window."

In the past 10 years, Cottonwood Gulch Expeditions has very intentionally worked to engage youth from less privileged communities, focusing on those closest to our organization in Albuquerque and Thoreau, NM. Through these programs, we have brought over 2000 youth from Title 1 schools in New Mexico outdoors over the past several years. I've been lucky to be a part of that process, both administratively and in the field with youth. We started this process with a program called Classrooms Get Outdoors (Classrooms GO)--a grant-funded program that enables Title I teachers to bring their classrooms on expeditions with us. We also partnered with the USFS in 2018 to run an Every Kid Outdoors program which enabled 300 youth to spend two days in the Cibola National Forest. While our agreement for the 2019 season was hung up for many months due to our status as both a permit holder and educational partner; we have moved forward in the past week to continue the EKO partnership under the existing regulatory framework. In 2018, we also started a Youth Conservation Corps program through a partnership with the USFS. We continued this program in the summer of 2019 and have signed an agreement for 2020. This type of work opportunity allows youth who need a summer job to also experience public lands, to contribute through service projects, and to recreate on days off with our program. Finally, over the past two years, we have implemented a program funded largely through The Wilderness Society called the Students In Wilderness Initiative (SIWI). This program brought 125 students out for ten field days and ten classroom sessions with our educators in the 2017-2018 school year, and will bring out roughly 220 students in the 2018-2019 school year. Each of the field days visits a Wilderness Area, and culminates in a five day backpacking program on federal lands. Through these programs, our organization has prioritized enabling students from underserved communities and backgrounds to access the outdoors and experience outdoor recreation opportunities, whether mountain biking, rock climbing, camping, backpacking, or just simply hiking on a local trail. Oftentimes, these youth have never had these opportunities.

In addition to these programs which address the access gap in Title 1 school communities of New Mexico, all of our programs (including open enrollment programs) are subsidized by about 30% through donations to our annual fund. In addition, roughly a third of our summer participants receive some level of direct financial scholarship and still more receive in-kind donation scholarships. As an organization, we have worked hard to create accessible programs across all areas of what we do.

As much as we can, we are working as an organization to make it possible for kids to get outside, to see the stars for the first time, and to engage with all that the outdoors has to offer. Through both Classrooms GO and SIWI, we hope to improve access and equity, inspire youth to develop a deep relationship with their natural surroundings, and engage youth in meaningful and hands-on learning opportunities in the real world. However, our work is made more challenging by the current process in place to obtain permits to operate on public lands. One of the greatest challenges that we have faced as an organization is the length of time that permitting takes and the challenging and confusing processes required.

Various Land Managers: Many Different Processes

Cottonwood Gulch works each year with multiple federal land managers. These managers differ dramatically in permitting protocol, which places substantial burden on nonprofit wilderness education entities like the CGE. This section will share our experiences with the differing manager protocols that exist under the current regulatory framework.

United States Forest Service

In working with the Southwest Region of the USFS, we have seen a variety of permitting processes. Some are very effective, some are less so, and some are frankly embarrassing. Recently we were chosen to participate in a review with the Washington Office of the USFS, which aimed to better understand the issues that exist with their education partners. This review gives us hope for better processes moving forward, even under the existing regulatory structures. Below are some case studies from that review.

On a warm summer day, a group of teenagers distribute the last of six days' worth of backpacking food and gear between their packs. My staff team is re-packing other gear into trucks, double-checking maps, and sending out a final satellite message to basecamp saying we're ready to ascend a 9,700 foot peak. More than nine months before, the Gulch submitted a permit for the trip--and then, six months prior, we've re-submitted it twice more, because the Forest Service has lost the first and second ones, and permitting staff have changed. We've been told, verbally, that regardless of official permit status, we'll be able to camp in the forest and complete our itinerary. And the permitting recreation specialist has written us (in an email) assuring me that the trip will be okay. While in the parking lot preparing for the trip, we're stopped by a law enforcement officer and told we will not be able to hike because we don't have the correct paperwork in place. We spend the remainder of the day trying to find a place to go. We eventually leave the forest of our planned hike and reroute to another forest, where we're able to complete a four-day backpack.

In another instance, we submitted a permit to three ranger districts of the same National Forest. Two ranger districts of a forest responded promptly (within five working days), while a third district never replied to our permit request at all. In this forest, one ranger district was our "primary" permit application, with other ranger districts signing off on the permit requests in their district. In another forest, each ranger district asked for complete permit applications for each district, as though they were completely separate from each other. Some forests require seven to fourteen business days to process a permit; others require for four to six weeks. Some forests ask for certifications and qualifications for our full-time and leadership staff; recently one forest asked for a list of qualifications and certifications for all of our staff (we employ roughly one hundred people per year in different capacities as field educators). As a program, we try to meet all requirements and requests; but their numerous and nonstandard demands challenge us to plan and execute effective outdoor education programming. Keep in mind that all of the forests described above are part of the same USFS region; we can only imagine what working with multiple forest regions would be like.

While these challenges have created some additional barriers to our programming, we also celebrate the partnership we have with the Southwest Region of the USFS. We have run several successful programs (Every Kid Outdoors, Youth Conservation Corps, etc.) with them, and have strong working relationships with many of the ranger districts and forests across the region. Access to these forests is essential to our operations, and we want to help create easier permitting processes for our program and for our partners in the forests, who are often equally confused as to what the correct process is. Candidly, it often feels as though forest officials are unsure what to do with our permits since we're not a traditional outfitter or guide. The SOAR Act and RNRT Act offer an opportunity for our partners at the USFS to streamline and simplify the processes needed for our program to access the forests appropriately.

National Park Service

Last week I was with a group of seventh graders from Mandela International Magnet School at Chaco Canyon National Historic Park. Our group visited Pueblo Bonito, the largest excavated great house in the Southwest. Students learned about the peoples who lived in this space over a thousand years ago, about different types of pottery sherds, about how people lived a thousand years ago; they learned about what archaeologists did at the site, about how modern Native people still visit the site for ceremony, and about the fraught history of archaeology in the Southwest. One student asked why archaeologists dug in a place so sacred to Native people; another asked about the ecology of the landscape and how it looked a thousand years ago. These are conversations that only happen when students are able to visit the incredible landscapes of the Southwest and on the amazing pieces of land managed by our federal system. Learning about the history of Chaco in the classroom simply can't compare to seeing it with your own eyes. What these students didn't know was the process we needed to go through to get them to that place.

When we visit National Park Service sites, the permitting process is often more challenging and confusing than the USFS. NPS requires Commercial Use Authorizations (or CUAs) for outfitters and guides. The CUA process is confusing and inconsistent; some parks require it for our programs, others do not. Some parks are willing to approve Educational Fee Waivers, some parks are not. Some parks will approve a fee waiver for certain areas of the park, but require a CUA for other areas of the park. Many smaller NPS-managed sites do not require any paperwork from us at all and simply ask that we practice LNT principles when we visit. Access to these "gems" of the federal land system is so important and essential to our program that we do and will continue to visit them and work with partners to share them with youth. We hope that these acts would simplify the processes and procedures for NPS-managed sites and improve permitting and access to them for programs such as ours. The proposed changes to the permitting processes included the SOAR Act and RNRT Act would help this process.

Bureau of Land Management

The Ah-Shi-Sle-Pah Wilderness Area, managed by the Bureau of Land Management, is a cornerstone of our SIWI program. Most of the 220 students we take out with SIWI this year will visit the wash, will see miniature hoodoos formed before their eyes when our staff pour water over rock and sand, and will hear how the US Congress designated it a Wilderness Area after years of it being a Wilderness Study Area. Recently, I had a student tell me that "actually, that hike was pretty cool," after spending a few hours exploring endless towers made of sand and rock and going on a quest to find dinosaur bones, protruding from the rock in places. Thousands of years of hoodoo formation and millions of years of geologic processes are visible immediately before your eyes.

When working with the Bureau of Land Management, our permitting process has been fairly smooth. We hold permits with multiple districts of the BLM and both permit processes and requirements and processing times are generally simple and straightforward. BLM rangers seem to be open to any and all recreational uses on BLM parcels, and we rarely have had trouble when applying for and operating on these lands. At some of the higher-visitation BLM sites, we have run into similar fee waiver challenges as an educational group as we have at NPS managed sites; in some districts, rangers have preferred to write a Letter of Authorization (LOA) as opposed to having us submit a Commercial Use Authorization. The flexibility to add permitted activities, add user days, and add locations within BLM districts has been very useful to our program.

Army Corps of Engineers

Three years ago, I needed a place to camp with a group of youth. Our plan had been to head up a remote forest service road and camp before a multi-day backpacking trip. Then, it rained -- and not a typical slow gentle rain, but a hard and heavy, monsoon-style, lightning-and-thunder type of rain, the type that makes you worried about flash floods in the Southwest. And the road we were planning on camping on crossed over a stream twice near the Cochiti Pueblo in north-central New Mexico. Luckily for us, there was an Army Corps of Engineers campground at the Cochiti Dam, nearby our planned camp location. We called the ranger station and were told there was plenty of room for the night and that we didn't need any kind of special permit for recreation. After getting to know the rangers a little more while staying in the campground, we have been able to contribute to helping clean up trails on that parcel of land, to re-paint some structures, and continue use of that campground. These sorts of partnerships help us advance the environmental ethic we wish to instill in all of our participants.

When partnering with the Army Corps of Engineers, we typically either contribute to a service project at campgrounds or simply camp for a night or two. At these sites, we are not asked to complete a permitting process, per se, but are simply asked to pay for camping fees. While the Army Corps of Engineers sites we visits provide logistically useful locations at times, the lack of focus on recreation is apparent; many of the sites we visit are man-made dams with campgrounds and reservoir access. Often times, these campgrounds are clearly relics of a time when outdoor recreation was a focus of many in the American Public. They have bathrooms that were built in the '60s and '70s, pergolas that have long seen better days, and campsites appropriate for the RVs popular fifty years ago. Rarely are there group sites, and more often than not, these recreation areas are simply pass-throughs for people travelling from place to place visiting other sites. While the SOAR Act does not address these realities, the RNRT Act would give this organization a recreational focus, and allow for the upgrades and infrastructure improvements needed to improve these sites.

Simplifying Outdoor Access for Recreation Act Provisions CGE Supports

Alternative Per-Person Fee (Sec 3 of SOAR, Sec 102 of RNRT)

- *This provision will substantially reduce the reporting headaches and complicated fee structures we face as an educational nonprofit.*

Another provision in these bills would allow land managers to have a flat per-person fee to access public lands. On federal lands, we are currently charged a 3% of revenue fee for each program that we run. At face value, this seems like a fairly simple and fair process for an “outfitter or guide;” because there is no category on federal lands for educational nonprofits, we fall into the same category as commercial hunting, fishing, or camping guides. For one program we run, an adult expedition called Flock and Rocks, we very much serve as an outfitter service, and charge a premium for our services. When we visit federal lands, we report the cost per person per day that we collect, and then submit that to a land manager and pay our fees. Again, fairly straightforward and simple.

For our SIWI programs (Students in Wilderness Initiative), we collect a \$125 fee per student for the entire program, including 10 field days, 10 classroom sessions, all transportation, equipment usage, educators times, planning and overhead, etc. We also receive \$600 per student in grant funding for this program. All of the field days for this program are facilitated on federal lands, specifically in Wilderness Areas. So, when we report to the USFS our revenue collected, do we report \$725 (total cost of the program), \$362.50 (total cost of field days), \$125 (amount schools pay), or \$62.5 (amount schools pay for field days)? Additionally, if we camp on BLM land for the first night, and hike in USFS land during that day, should we prorate our fee to the percentage of time spent in each jurisdiction? Or report to one agency? Or double pay to each agency? How should our organization handle a summer expedition where out of 20 youth, perhaps 10 have received scholarships ranging from 10-95% of our program cost? These rules, regulations, and fees are essential to federal land managers holding various guide services and outfitters responsible and to responsibly managing these federal lands. They might even make sense for simple guiding and outfitting. However, for programs like ours, where over 60% of our participants receive some level of scholarship, they are baffling and overwhelming, to say the least. We do our best to accurately report our usage; enabling land managers to charge a flat fee per participant would be a massively helpful step towards simplifying this process. Perhaps there could even be a different rate for education nonprofits.

Permitting Process Improvements (Sec 4 of SOAR, Sec 103 of RNRT)

- *This provision will ensure timely processing of permits, and acknowledgement of receipt of permit applications, and streamlined processes.*

One of our full time staff people’s primary role is navigating and submitting permits to federal lands and ensuring compliance with and complete reporting to the land managers. We have to submit the same documentation to multiple forests within the same district, and the same documentation to multiple agencies across departments. This represents a substantial burden on organizations like Cottonwood Gulch. If the permitting process were improved by eliminating duplicative processes, reducing costs, and decreasing processing time, our organization would increase our capacity to plan and facilitate life changing experiences for young people. Furthermore, this provision would enable online applications for permits; while this provision makes us somewhat nervous (it would be a massive shift), it seems that the record-keeping online might be an improvement from permit-granting offices that have lost our permit applications in the past.

Permit Flexibility (Sec 5 of SOAR, Sec 104 of RNRT)

- *This provision will substantially reduce the number of permits required of the Gulch each year and will allow permits to shift and change with our programs.*

We have held permits in the Sandia Mountains for several years, which enable us to rock climb at limited sites and hike in other areas. In the past few years, we have integrated more day trips through our SIWI program into our operations. Making a request to add more hiking trails to our operations in both the BLM and USFS portions of the Sandias would require us to submit entirely new permits for each of those agencies; for the USFS, this would actually require two permits (One for the Sandia Ranger District, one for the Mountainair Ranger District). These permits, if granted, would be valid for a year, and would then require re-submittal every year. As proposed in Section 5 of the SOAR Act, adding these activities to our existing permits would be possible, and after two years of satisfactory operations, we would be able to get a long-term permit.

Permits for Multijurisdictional Trips (Sec. 7 of SOAR , Sec 106 of RNRT)

- *This provision will allow us to work with a single land manager for a trip permit in multiple jurisdictions, reducing the amount of paperwork we would need to submit.*

The planning of multijurisdictional trips is something that our organization frequently engages in as we craft meaningful outdoor experiences for the youth we work with. Last week, I was leading an expedition that visited four different jurisdictions of federal land. The curriculum was based around the history of Native people in New Mexico and on the geologic processes of Western NM. On day one, we visited a roadside site in the Rio Puerco district of the BLM; that night we explored and camped on land managed by the Farmington District of the BLM. The following day, we explored Chaco Canyon, managed by the NPS, and camped again on BLM land. The third day, we visited the Jemez Mountains, part of the Santa Fe National Forest. For this expedition, we were required to have a separate permit in place for each location, submit a trip itinerary to each land management agency including a list of all of our staff and their qualifications in the outdoors, and each staff on the trip was required to carry the complete operating plan with them. We will likely maintain permits with each of these agencies due to the high number of user days we have in each of them; however, when visiting less-frequent areas, having the ability to write a multijurisdictional permit for one or two programs per year would greatly reduce our permitting paperwork.

Extension of Special Recreation Permits (Sec. 11 SOAR, Sec. 110 of RNRT)

- *This provision will ensure that long-term permits which we hold are extended beyond their end date when our organization submits required paperwork and will not be held up due to agency delays.*

Our program has operated in the El Malpais for long before it became a National Monument in 1987. We now are required to have a permit to operate in this area, and even when we submit proper documentation to apply for a new permit, if our permit expires there is little we can do. Right now, we are in this limbo; our 10-year permit expired in April of 2019, and while we have been assured both verbally and via email we can continue to operate, we have no official permit to support this. Section 11 of the SOAR act would ensure that when organizations submit proper permit renewals in a timely manner, their permits would be automatically extended, regardless of delays created by land management agencies.

Recreation Not Red Tape Act Provisions CGE Supports

Extension of Seasonal Recreation Opportunities (Sec. 301 of RNRT)

- *This provision will require land managers to identify areas in which use is highly seasonal and extend those seasons as appropriate.*

Just two days ago, I called to ask why the Coal Mine Campground in the Cibola National Forest had closed; the ranger who answered the phone explained that September 15th was the last open day of that campground for the season. When I commented that now is one of the most pleasant times of the year to be out camping, she agreed, and said she had been out in beautiful weather the last week. The nights are crisp right now, the mornings chilly, and the sunrises beautiful. Our program also has a trip planned in the area in two weeks, and we would have loved to camp at that site--Furthermore it would have reduced our impact on other areas of the forest (there are minimal facilities), wouldn't have taken sites away from the general public (given that it is the "off season" there would likely have been plenty), and would have been logistically easier for our group. This provision would help to make sure that these types of opportunities stay open and available to recreation groups like ours throughout times in the season that while not "peak" is still beautiful and usable.

Recreation Performance Metrics (Sec. 302 of RNRT)

- *This provision will ensure that existing federal land managers include recreation in their performance metrics.*

Currently BLM and USFS-managed lands have metrics by which land managers are evaluated. These metrics include recreation, at times, but do not have a priority on recreation and tourism. Cottonwood Gulch would be a supporter of the recreation performance metrics. As an organization that brings school and youth groups to various public lands for approximately eight thousand user days being included in an evaluation of the effectiveness of land managers seems appropriate. While other measures are important (scientific monitoring, resource extraction, etc), we believe that recreation, one of the only forms of use accessible to the American Public, should be a priority for the two largest federal land management agencies.

Recreation Mission (Sec. 303 of RNRT)

- *This provision will ensure that more federal agencies include recreation in their management mission and plans.*

Increasing the number of agencies with a recreation mission seems like a logical and important step forward to increase opportunities for outdoor engagement. Imagining a system of recreational lands that includes the Army Corps of Engineers, the Bureau of Reclamation, the FERC, and the DOT would increase the number of areas accessible to the public (and to organizations like ours) for recreational purposes. This would (in turn) decrease recreation on other public lands and allow for better experiences in the outdoors overall for all agencies.

National Recreation Area System (Sec 304 of RNRT)

- *This provision will ensure that more federal land would be protected for a variety of recreation purposes.*

Establishment of a National Recreation Area System would be useful to our organization to protect valuable recreation resources which are currently eligible for other uses. One of the campsites we regularly visit has incredible views in nearly every direction, is about 15 minutes from a recently established Wilderness Area, is an hour from Chaco Canyon NHP, and has unique geologic resources in the form of a cliff band and several hoodoos surrounding a wash. It is a wonderful place to camp, hike, and explore with youth; a high-quality place to recreate. About a year ago, the BLM authorized an oil derrick about a half-mile from this wonderful area. Now, when camping at the site, the thump-thump of oil being pumped out of the earth is present when sleeping or reflecting on the area. The thump-thump is present while watching the sunrise in an otherwise serene landscape. The thump-thump is present when watching red-tailed hawks dive-bomb each other. While this area does not, and should not, meet the qualifications for protection as a Wilderness Area, it would have been wonderful for it to be preserved as a recreation area. Other areas, such as mountain bike trails in Placitas or San Ysidro, rock climbing areas near El Rito, canyons near Socorro, or campsites near Zion National Park would be unique and perfect candidates for inclusion as part of a National Recreation Area System. Identifying and protecting these areas for recreation will ensure that recreation on public lands will continue to be possible for future generations.

Interagency Trail Management (Sec. 411 of RNRT)

- *This provision will ensure that trails that travel through multiple jurisdictions have a unified management plan.*

Interagency trail management would not only improve access and use of outdoor recreation in general, it would simplify access for organizations like Cottonwood Gulch as well. For example, last summer we attempted to take a group on an extended backpacking trip on the Continental Divide Trail. While we held permits for many sections of the trail, we were challenged to piece together a suitable trip itinerary for that group because we were unable to secure permits through some public lands. Ultimately, our group completed a shortened section of the CDT because it was the only distance on which we could secure the required permits. If all of the agencies that managed pieces of the trail could collaborate on a management plan including a permitting process that covers all jurisdictions that the proposed trip would travel within, that would vastly improve the process. Furthermore, some trails which travel between different sections of federal or state lands (the CDT again serves as a good example) have different trail markers, blaze colors, and even trail names/numbers. For our program, this presents less of a challenge since our staff are trained and prepared for this; however, for your “average recreationalist,” having a uniform trail network across jurisdictions would be beneficial.

Remaining Challenges

While the SOAR Act and the RNRT Act are massive steps in the right direction to simplifying and improving the regulatory processes associated with visiting public lands, these acts would not completely resolve the fee system for our youth education programs. When we are operating as a youth education organization, in partnership with K-12 schools, we are often denied educational fee waivers for entry to public lands. This makes it difficult to keep our costs low and remove barriers, particularly for populations of students who have historically been marginalized and/or excluded from outdoor access. In fact, we sometimes have to pay more for entry than students who visit the public lands with their families would have to pay. Ideally, organizations like ours would be subject to a substantially lower fee or no fee at all in time.

Additionally, increasing federal funding available for outdoor education, similar to the Every Kid Outdoors program, would continue to lower barriers for access to public lands, especially for certain populations, like students at Title 1 schools. Ultimately, if every student in K-12 schools had access to outdoor education programming, the number of students who have meaningful connection to the outdoors and America's public lands would be vastly increased. The research around brain development in the natural world is truly overwhelming in showing benefit across all ages and developmental stages. This would inevitably shape a population of young people and adults who are responsible recreationalists and even perhaps interested in land management careers.

Conclusion

In conclusion, Cottonwood Gulch Expeditions supports the passing of Simplifying Outdoor Access for Recreation Act, H.R. 3879, 116th Cong. (2019) and Recreation Not Red Tape Act, H.R. 3458, 166th Cong. (2019) for many reasons. These acts would not only simplify the permitting process for organizations like us, they would enable more of America's youth to access public lands for recreation. They would allow our organization to spend more time doing what we do best--connecting youth to the outdoors, and enable the youth that we work with to have memories of recreating and learning in the outdoors. We hope that our testimony is useful for the committee.

