



September 20, 2024

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United States Forest Service
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Washington, DC 20250-1124

Submitted via: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>

RE: Protecting America's Outdoors Coalition comments on Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System and Draft Environmental Impact Statement

Dear Ms. Walker,

Outdoor Alliance, The Conservation Alliance, and the Outdoor Industry Association—the Protecting America's Outdoors Coalition—thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the U.S. Forest Service's (USFS) proposed amendments to land management plans to address old-growth forests across the National Forest System (NFS). These comments outline the perspectives of the human-powered outdoor recreation community, the outdoor industry, and conservation minded businesses on the National Old-Growth Amendment (NOGA), and include recommendations to ensure that NOGA meets its intent of fostering "the long-term resilience of old-growth forests and their contributions to ecological integrity across the NFS."¹ Overall, we strongly support the USFS's work to conserve old growth and mature forests, and we encourage the agency to strengthen NOGA to protect and enhance the benefits that these forests provide for biodiversity, cultural values, the climate, and outdoor recreation.

In addition to these comments, Outdoor Alliance is also a signatory on two separate comment letters submitted by Silvix Resources, et al. (hereinafter the "Denver Group"). We consider the comments, technical memo, and red lines submitted by

¹ DEIS at S-1.

this coalition to be complementary to the comments and recommendations described here.

As both recreation stakeholders and conservation advocates, our goal with these comments is twofold. First, in order to achieve its intent, NOGA must be functionally sound, implementable, and successful at protecting old-growth forests, expanding their extent where appropriate, and incorporating indigenous stewardship into old-growth conservation and management.

Second, the amendment should support recreation access goals and should increase opportunities for recreationists of multiple disciplines to experience old-growth forests and gain an appreciation for these special ecosystems. Old-growth forests are the settings for outstanding outdoor recreation opportunities throughout the NFS. As we described in our comments on the NOGA Notice of Intent (NOI),² recreationists are drawn to old-growth forests for their outstanding scenic values and high ecological integrity, as well as for the opportunities that these forests provide to better understand the natural and cultural history of our public lands. Our hope is that NOGA—while protecting ecological and cultural values—also protects and expands this recreation experience for future generations.

Although improved since the NOI, NOGA must be strengthened to fully achieve both of these overarching goals. Our high-level recommendations for improvement include:

- Clearly support “passive” stewardship in appropriate ecological settings;
- Clarify that proactive stewardship actions should not degrade old-growth forests;
- Strengthen the exception to NOGA in Standard 2(b) to ensure that allowable projects do not unnecessarily degrade old-growth conditions;

² Outdoor Alliance, The Conservation Alliance, and Outdoor Industry Association, Comments on 88 F.R. 88042, Land Management Plan Direction for Old-Growth Forest Conditions across the National Forest System (2024), *available at* <https://static1.squarespace.com/static/54aabb14e4b01142027654ee/t/65bd48f3b1d7ac0735e17388/1706903796146/PAO+Coalition+-+USFS+National+Old-Growth+Forest+Plan+Amendment+Comment.docx.pdf>

- Refine the list of exceptions in Standard 2(c) to ensure that they are not used for unintended purposes; and
- Scale back the goals for Adaptive Strategies for Old-Growth Conservation to achievable levels.

These recommendations, and additional context around NOGA and outdoor recreation access, are described in detail below.

1. Positive Changes to NOGA

NOGA's substantive provisions have changed considerably between the 2023 Notice of Intent and the modified proposed action in the DEIS. We appreciate several aspects of the updated plan components and generally find the language to more clearly describe how NOGA will be implemented by USFS line officers.

Important improvements include:

- *Where NOGA applies.* The NOI was unclear about how NOGA might be implemented on the ground and where the amendment would apply across the NFS. The updated Standard 1 and Standard 2a are much clearer that the amendment applies wherever old-growth conditions (as determined using local or regional definitions) exist. Although we foresee some challenges in making this determination at the local level, we are pleased to see this requirement clearly stated in forest-wide standards rather than being developed later through Adaptive Strategies, as had been proposed in NOI.
- *Objectives strengthened.* We are pleased that the NOI's objective that "one landscape" exhibit improvements in old-growth conditions within 10 years has been removed and that the new objectives require broader gains in old-growth forest conservation across the plan area,³ while also setting clear

³ DEIS at 27. NOGA-FW-OBJ-04 states that "[F]orest ecosystems within the plan area will exhibit a measurable, increasing trend towards appropriate amounts, representativeness, redundancy, and connectivity of old-growth forest that are resilient and adaptable to stressors and likely future environments."

expectations for proactive stewardship projects,⁴ including co-stewardship projects with Tribes.⁵

- *Recreation referenced in Desired Conditions.* Outdoor recreation is now clearly referenced in the list of ecosystem services provided by old-growth forests in Desired Condition 3. We support this change and appreciate its implicit acknowledgment of the sustainability of recreational experiences in old-growth forests.
- *Proactive stewardship defined.* The concept of “proactive stewardship” is central to how NOGA envisions improving old-growth forest conditions over time. This term is now more clearly defined in the DEIS and is incorporated into Standard 2a. As we have outlined below, we ask that this definition be updated to include a reference to “passive” stewardship (or that NOGA define passive stewardship separately).

2. Concerns and Recommendations for Improvement

As stakeholders and frequent collaborators on USFS projects and forest plans, we are concerned that certain aspects of the proposed action remain difficult to implement and are unlikely to meet NOGA’s intent of conserving old-growth forests. As a general matter, and to the maximum extent possible, NOGA should provide clear, implementable direction to local land managers who will be charged with making on-the-ground decisions about old-growth conservation. The USFS is a large, geographically diverse, and highly decentralized agency where local line officers have a large amount of discretion in how decisions are made. While this overall structure enhances the agency’s ability to take local ecological and social factors into account, it can also create some discontinuity in how national level policies like NOGA are implemented. We are concerned that the lack of clarity in certain plan components, combined with the broad exceptions to NOGA envisioned through Standards 2b and 2c, might lead to inconsistent implementation of NOGA

⁴ *Id.* NOGA-FW-OBJ-02 states that within one year following adoption of an adaptive strategy, a unit should “initiate at least three proactive stewardship projects/activities in the planning area to contribute to the achievement of old-growth forest desired conditions.”

⁵ *Id.* NOGA-FW-OBJ-03 states that within two years following adoption of an adaptive strategy, a unit should “initiate at least one co-stewardship project with interested Tribes for the purpose of proactive stewardship.”

at the local level, especially considering the agency's capacity constraints and other pressures such as timber targets or acreage targets for hazardous fuels.

We have provided more detail on our highest-level concerns and suggestions in the sections below.

a. Clearly support "passive" stewardship

The proposed action clearly envisions and promotes "proactive" stewardship actions like thinning, prescribed fire, and biomass removal where needed to increase old-growth forests' resilience to high severity fire and other threats. These actions are appropriate across much of the NFS, specifically in frequent-fire forests that have been altered by fire exclusion and development over the past two centuries. The proposed action is less clear about what management actions are appropriate in wetter, infrequent-fire forests, such as those of the western Cascades, where these proactive stewardship actions are less clearly scientifically justified. According to the DEIS, forests with infrequent fire regimes (fire return intervals >35 years) make up more than half of the old-growth forests currently found across all NFS lands.⁶ To address these ecosystems, the amendment should more clearly support "passive" stewardship whereby land managers choose not to pursue any vegetation management in pursuit of old-growth conservation goals. We understand that the agency's intent is not for NOGA to preclude a passive management approach, but the appropriateness of this approach should be more clearly written into the standards.

Recommendation: Clarify that passive stewardship is an appropriate management strategy in old-growth forests. This could be accomplished by including an independent definition for passive stewardship and directly referencing this term into Standard 2a, or by incorporating passive stewardship strategies into the definition of "proactive stewardship."

b. Proactive stewardship should not degrade old growth characteristics

⁶ DRAFT Ecological Impacts Analysis Report at 19-20.

The plan components included in the NOI included a standard that provided that vegetation management activities “must not degrade or impair the composition, structure, or ecological processes in a manner that prevents the long-term persistence of old-growth forest conditions within the plan area.”⁷ This standard is absent from the proposed action and has been replaced with a new Standard 2a, which, although similar in intent, does not clearly prohibit management actions that degrade old growth forests. Without this basic sideboard, it is possible that proactive stewardship projects could degrade old-growth characteristics, possibly compromising NOGA’s intent. To remedy this issue, we support the Denver Group’s proposed edits to Standard 2a, which read:

“Where conditions meet the definitions and associated criteria of old-growth forest, manage the forest for the retention and enhancement of those characteristics using either passive or proactive stewardship approaches, as ecologically appropriate. Proactive stewardship shall maintain, or contribute towards the restoration of the quality, structure, distribution, abundance, pattern, ecological processes, and composition characteristic of the desired old growth forest type, taking into account the contribution of the stand to landscape fire adaptation and watershed health and retaining the large trees contributing to old growth structure as appropriate for this forest type. Proactive stewardship in old-growth forests shall promote one or more of the following...”

These proposed changes to Standard 2a incorporate the non-degradation standard as it applies to proactive stewardship projects. Other allowable projects, such as recreation infrastructure projects, would then be evaluated through a strengthened Standard 2b, which is described below.

c. Refine Standard 2b

⁷ See, U.S. Department of Agriculture, Forest Service, Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System, 88 F.R. 88042 (Dec. 20, 2023). Standard #1 reads “Vegetation management activities must not degrade or impair the composition, structure, or ecological processes in a manner that prevents the long-term persistence of old-growth forest conditions within the plan area.”

The proposed action includes a new Standard 2b, which allows for tree cutting in old-growth forests when “(1) incidental to the implementation of a management activity not otherwise prohibited by the plan, and (2) the area—as defined at an ecologically appropriate scale—continues to meet the definition and associated criteria for old-growth forest after the incidental tree cutting or removal.”⁸ We support the intent of this standard—to allow for appropriate projects outside of proactive stewardship (such as trail development) to occur in old-growth forests—but we are concerned that this standard is broadly written in a way that could undermine NOGA’s intent. Forest plans allow for a wide range of activities that might degrade old growth forests, and in many cases these could be designed in a way to minimize impacts to old-growth forests or avoid impacts altogether. The DEIS states that, “The purpose of this standard is to provide clarification that cutting or removal of trees can occur in old-growth forest for purposes other than proactive stewardship so long as it occurs within the sideboards specified in (1) and (2). For example, this would allow for trail development or maintenance.”⁹ Using trail development as an example, in most scenarios building a trail should not require cutting large trees or other important structural features of old-growth. In the limited instances where this might be necessary, our community would welcome additional guidance and sideboards to help ensure that recreation infrastructure projects do not degrade old-growth characteristics.

Our community also seeks additional clarity on how land managers and project proponents will determine whether an area continues to meet the definition and criteria for old-growth at an ecologically-appropriate scale—a critical determination for understanding Standard 2b’s strength as a sideboard for protecting old-growth forests. Applying local old-growth criteria and determining what constitutes an “ecologically-appropriate scale” will each require some discretion on the part of local land managers. Project proponents would benefit from further discussion in the FEIS on how these determinations will be made. For example, is an “ecologically-appropriate scale” 100 acres? A watershed? A fireshed? Would a clearcut made to allow for a pipeline or transmission line be allowed if it significantly reduces the geographic extent of an old growth stand? And how does

⁸ DEIS at 30.

⁹ *Id.*

Standard 2b apply to smaller isolated old growth stands where any tree cutting would degrade old-growth characteristics?

Finally, with regard to projects allowed through Standard 2b, the DEIS acknowledges that “some of these infrastructure or multiple use activities may be large enough that they impact whether an area meets the definition and associated criteria of old-growth at the ecologically appropriate scale” and this statement is repeated in the Ecological Impacts Report.¹⁰ Given Standard 2b’s clear requirement that projects not cause an area to no longer meet the definition and criteria for old-growth at an ecologically appropriate scale, we find this statement extremely confusing and counter to NOGA’s intent. The FEIS should clarify that projects that degrade old-growth forests are not allowed by Standard 2.b and require a project-specific plan amendment, as is described in the Social, Economic and Cultural Impacts Analysis Report.¹¹

Recommendation: Standard 2b will best meet its intent of preventing degradation of old-growth forests while allowing for multiple uses if it is strengthened to qualify that tree cutting or removal should only occur in old-growth forests when no practicable alternatives exist and after minimizing the effect to old-growth forest conditions.

d. Standard 2.c exceptions

Standard 2c provides a list of exceptions to NOGA’s limitations on tree cutting in old-growth forests. We support several of these exceptions, such as the exception for protecting public health and safety (Standard 2c(ii)) and for culturally significant uses as informed by tribes (partial Standard 2c(iv)); however, as with Standard 2b, we are concerned that others are broadly written in a way that does not meet NOGA’s intent:

¹⁰ *Id.* at 104; DRAFT Ecological Impacts Analysis Report at 98.

¹¹ See, DRAFT Social, Economic and Cultural Impacts Analysis Report at 61, “In instances where the project activities are not compliant with NOGA-FW-STD-02b and deviations in NOGA-FW-STD-02c do not apply, a project-level plan amendment may be necessary for the project to proceed. In some cases, the deciding official may decide not to pursue a project-level plan amendment and forego the project altogether, with potential consequences for developed infrastructure, facilities, or assets on the forest and associated recreation and economic benefits.”

i. Municipal watersheds

Standard 2c(i) provides an exception “[i]n cases where this standard would preclude achievement of wildfire risk management objectives within municipal watersheds...”¹² The FEIS should be more specific about what is intended by “municipal watersheds.” The USFS Climate Risk Viewer includes a layer titled “NFS Municipal Watershed Supply Inventory,” which includes vast areas of public forestlands, in some cases encompassing nearly all of certain National Forests.¹³ While we doubt that this is the agency’s intent, granting an exception for this entire delineated area would remove NOGA’s protections in most areas of the NFS that contain old-growth forests. The FEIS should clarify what is intended by this term. We support narrowing this exception to “municipal water supply systems” as defined by the Healthy Forest Restoration Act.¹⁴

ii. “De minimis” use

Standard 2c(iv) provides an exception for “culturally significant uses as informed by tribes or for de minimis use for local community purposes.”¹⁵ As is mentioned above, we support an exception for cultural uses by tribes. However, the inclusion of “de minimis use for local community purposes” is more broadly written than necessary to account for its intended purpose of allowing for deviations from NOGA in the Southeast Alaska Sustainability Strategy (SASS).¹⁶ If this is indeed the agency’s intent, NOGA should provide an unambiguous exception for implementing SASS rather than the more general language that could be interpreted to cover

¹² DEIS at 31.

¹³ See, U.S. Department of Agriculture, Forest Service, Forest Service Climate Risk Viewer (1.0.4), Water and Watersheds, available at <https://storymaps.arcgis.com/collections/87744e6b06c74e82916b9b11da218d28?item=4>.

¹⁴ 16 U.S.C. § 6511(12).

¹⁵ DEIS at 31.

¹⁶ *Id.* at 33, “The intent is that, in the limited instances where implementation of the SASS is not consistent with the definition of proactive stewardship in old-growth forests, the combined use of 2.c.iii and 2.c.iv would allow for continued implementation of the Southeast Alaska Sustainability Strategy, including for small sales for local mills, music wood, and culturally significant uses like totem poles.”

management activities in other parts of the NFS that could degrade old-growth characteristics.

iii. Not relevant or beneficial

Standard 2c(vi) allows for deviations from NOGA “in cases where it is determined – based on best available science, which includes Indigenous Knowledge – that the direction in this standard is not relevant or beneficial to a particular species or forest ecosystem type.”¹⁷ According to the DEIS, this exception is intended to “recognize that not all ecosystem types in a plan area have the ecological capacity or ecosystem potential to reach an old-growth forest development stage” and cites birch, aspen, jackpine, and lodgepole pine as forest communities where this exception would apply.¹⁸ Given that Standard 2a already limits NOGA to areas where “conditions meet the definitions and associated criteria of old-growth forest,”¹⁹ we question whether this exception is necessary. We understand that part of the agency’s intent for Standard 2c(vi) is to encompass situations where NOGA might preclude necessary restoration objectives. In this regard, we support the proposed language submitted by the Denver Group, which states “in cases where it is determined—based on best available science, including Indigenous Knowledge—that the direction in this standard would preclude restoration of process, composition, or structure consistent with the natural range of variation and Desired Condition 1.”

e. Adaptive Strategies for Old-Growth Forest Conservation

The requirement that individual forests or other geographies craft Adaptive Strategies for Old Growth Conservation is core to NOGA’s structure and is an essential component of how the amendment will be implemented. Adaptive strategies are described in Management Approaches 1a–1d, as well as in Objectives 1-4. We appreciate that this approach allows for locally-tailored conservation strategies—which are essential considering the wide range of old-growth forest ecosystems across the NFS—but we are concerned that the number and complexity

¹⁷ *Id.* at 31.

¹⁸ *Id.*

¹⁹ *Id.* at 29.

of tasks to be developed under these strategies is overly ambitious considering USFS and stakeholder capacity. These capacity limitations are especially important considering that many of the desired outcomes of NOGA tier from information developed through adaptive strategies. We recommend significantly narrowing down the list of actions to be carried out under Adaptive Strategies to focus primarily on identifying areas that have the inherent capability to support old-growth conditions over time, and more importantly, to identify strategies and locations for old-growth forest recruitment, where appropriate.

f. Inherent capability

NOGA emphasizes in multiple respects that old-growth conservation and restoration activities will be targeted in areas that have the “inherent capability” to sustain future old-growth forests and notes climate and fire refugia as attributes of areas that might have this inherent capability.²⁰ While we generally support this concept as a way to prioritize investments in proactive stewardship, we caution that over-relying on this criteria might result in a lack of attention to some existing old-growth forests that may be of high value to the outdoor recreation community. We understand that the USFS plans to base the determination of whether or not an area has the inherent capability to sustain old-growth forests, at least in part, on climate and wildfire modeling that is already available to agency land managers. We ask that, in cases where modeling shows that an area might be unlikely to sustain old-growth forests over time, attention still be given to intact old-growth forests with high recreational values.

3. Additional Comments on Outdoor Recreation Access

Our organizations are deeply invested in NOGA, in part due to its potential to enhance sustainable outdoor recreation access in old-growth forests. For the most part, we consider NOGA to be synergistic with recreation access goals, and we are committed to working with the USFS through adaptive strategies, forest plans, and elsewhere to ensure that old-growth conservation and recreation goals are

²⁰ *Id.* at 23. Management Approach 1.b states “Identify areas that have the inherent capability to sustain future old-growth forest (i.e. areas of likely climate or fire refugia) over time and prioritize them for proactive stewardship for one or more of the following purposes.”

developed in harmony. We also have questions and comments about how certain aspects of NOGA will affect outdoor recreation and ideas for how to better integrate recreation into NOGA's implementation. These comments are outlined in the sections below.

a. Old-growth surveys

We appreciate that all alternatives allow for “continued management of nearly all existing recreation sites, facilities, and assets; continuation of existing special use authorizations; and implementation of activities that have already been analyzed and approved without additional planning and analysis.”²¹ For new recreation infrastructure projects in old-growth forests, the DEIS states that projects “may need to survey the project area for old-growth, and associated survey burdens may be incurred by the forest or project proponents.”²² As regular proponents of trail systems and other recreation infrastructure projects, members of our community are likely to be tasked with adhering to these survey requirements. The FEIS should include more detail about the cost, level of complexity, and availability of resource specialists (including USFS staff) with the expertise to complete such surveys. This information will help recreationists better understand the extent to which NOGA might serve as an obstacle to recreation projects.

b. Ski areas

We are concerned that, unless Standards 2a and 2b are strengthened, NOGA might allow for ski area development to unnecessarily degrade old-growth forests. Under NOGA, activities already authorized within ski areas are covered by Standard 2c(iii)'s exception for “authorizations of occupancy and use made prior to the old-growth amendment decision.”²³ New authorizations will be subject to Standard 2b's more general exception for otherwise allowable activities that do not degrade old growth forests as defined at an ecologically appropriate scale. If a project does not comply with Standard 2b, the deciding official may choose whether to pursue a

²¹ *Id.* at S-14.

²² *Id.*

²³ DRAFT Social, Economic and Cultural Impacts Analysis Report at 62.

project-level plan amendment or forego the project altogether.²⁴ As is mentioned above, more clarity is needed to understand what constitutes an “ecologically appropriate scale” in order to determine the potential impacts of ski area projects. From our perspectives, ski area development, and particularly boundary expansions, should not be authorized if they would degrade old-growth forests at a significant scale. To alleviate this concern, we recommend adopting the edits to Standards 2a and 2b described above in Section 2 of these comments.

c. Recreation and proactive stewardship

In our comments on the NOI, we encouraged the USFS to better integrate outdoor recreation into NOGA, in part by encouraging line officers to account for recreation assets (trail networks, climbing areas, rivers, etc.) in project planning for proactive stewardship projects.²⁵ Examples include targeting proactive stewardship projects in old-growth forests that contain high value recreation infrastructure, rehabilitating recreation infrastructure like trails during project implementation, designing restoration projects in a way that enhances backcountry ski terrain (i.e. glading), or designing and locating projects to maximize benefits for scenic integrity. To facilitate this integration with recreation goals, we recommend that NOGA adopt the management approach below:

Management Approach: Design proactive stewardship activities to protect and enhance recreational resources, including sustainable recreation infrastructure and scenic values. Wherever possible, design proactive stewardship activities with input from recreation staff.

Incorporating this management approach will help to ensure that NOGA implementation proceeds in a way that is synergistic with recreation values and will help to build public support for the agency’s old-growth conservation work.

4. Conclusion

²⁴ *Id.* at 63.

²⁵ Outdoor Alliance, The Conservation Alliance, and Outdoor Industry Association, *supra*, 8-10.



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Thank you for considering the targeted recommendations for changes to NOGA described in these comments. The outdoor recreation community, the outdoor industry, and conservation-minded businesses appreciate and support the USFS's work to conserve mature and old-growth forests, and we are committed to working with agency staff at both the national and local level to ensure NOGA's success.

Best regards,

A handwritten signature in black ink, appearing to read "Louis Geltman".

Louis Geltman
Vice President for Policy and Government Relations
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A handwritten signature in black ink, appearing to read "Shoren Brown".

Shoren Brown
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Our Organizations

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.

The Conservation Alliance is an organization of like-minded businesses whose collective contributions support grassroots environmental organizations and their efforts to protect wild places where outdoor enthusiasts recreate. Alliance funds have played a key role in protecting rivers, trails, wildlands and climbing areas. Membership in the Alliance is open to all companies who care about protecting our most threatened wild places for habitat and outdoor recreation. Since its inception in 1989, The Conservation Alliance has contributed more than \$21 million, helped to protect more than 51 million acres of wildlands; protect 3,107 miles of rivers; stop or remove 34 dams; designate five marine reserves; and purchase 14 climbing areas. For complete information on The Conservation Alliance, see www.conservationalliance.com.

Based in Boulder, Colorado, with offices in Washington, D.C., Outdoor Industry Association (OIA) is a catalyst for meaningful change. A member-based collective, OIA is a passionate group of business leaders, climate experts, policy makers, and outdoor enthusiasts committed to sustainable economic growth and climate positivity while protecting—and growing access to—the benefits of the outdoors for everyone. For more than 30 years, OIA has catalyzed a thriving outdoor industry by supporting the success of every member company across four critically aligned areas: market research, sustainability, government affairs, and inclusive participation. OIA delivers success for its members through education, events, and business services in the form of solutions and strategies, consultation, collaboration, and opportunities for collective action. For more information, visit outdoorindustry.org.