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December 15th, 2021

Senator Joe Manchin, Chair  
Senate Energy and Natural Resources Committee  
304 Dirksen Senate Building  
Washington, DC 20510

Senator John Barrasso, Ranking Member  
Senate Energy and Natural Resources Committee  
304 Dirksen Senate Building  
Washington, DC 20510

RE: Senate Energy and Natural Resources Committee Legislative Hearing: Environmental Justice in Recreation Permitting Act (S. 1269); Federal Interior Land Media (FILM) Act (S. 1616); Recreation Not Red-Tape Act (S. 1874); Parks, Jobs, and Equity Act (S. 2258); Outdoors For All Act (S. 2887); Outdoor Recreation Act (S. 3266)

Dear Chairman Manchin and Ranking Member Barrasso:

On behalf of the whitewater paddling community, American Whitewater writes to express our appreciation for holding a full committee hearing on outdoor recreation. Several of the individual bills are of particular interest to the whitewater paddling community including Environmental Justice in Recreation Permitting Act (S. 1269); Federal Interior Land Media (FILM) Act (S. 1616); Recreation Not Red-Tape Act (S. 1874); Parks, Jobs, and Equity Act (S. 2258); Outdoors For All Act (S. 2887); and Outdoor Recreation Act (S. 3266). These legislative proposals before the Committee would affect recreation management and elevate the importance of managing whitewater rivers and the public lands they flow through for their recreation value. Several of the bills also seek to provide more equitable access to outdoor recreation.

We are tremendously pleased by, and grateful for, the Committee's work last Congress to secure the passage of the John D. Dingell, Jr. Conservation, Management, and Recreation Act as well as the Great American Outdoors Act; we believe the Committee has an opportunity to build on the momentum of this success and work toward passage of similarly well developed legislation that protects and enhances opportunities for outdoor recreation that

include whitewater paddling. We also appreciate the opportunity we were afforded to testify before the Committee in March 2019 and raise several issues in an oversight hearing that are addressed in the legislative proposals before the Committee.<sup>1</sup>

### **About American Whitewater**

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with approximately 50,000 supporters, 6,900 dues-paying members, and 100 local-based affiliate clubs, representing whitewater enthusiasts across the nation. American Whitewater's mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. The organization is the primary advocate for the preservation and protection of whitewater rivers throughout the United States, and connects the interests of human-powered recreational river users with ecological and science-based data to achieve the goals within its mission. Our vision is that our nation's remaining wild and free-flowing rivers stay that way, our developed rivers are restored to function and flourish, that the public has access to rivers for recreation, and that river enthusiasts are active and effective river advocates. Our members live, work, and recreate on rivers whose management would be affected by the bills before the Committee. We offer specific comments below.

### **Capacity Limits and Allocations**

While allocations and capacity limits for special recreation permits for areas in which use is allocated are not covered in the bills before the Committee, the fact that some of the bills address permitting has raised questions on allocations for special recreation permits on fully allocated river systems. The majority of popular multi-day river trips in the West require these permits for both members of the public and guided trips; allocations are typically split into a set number of launches for outfitted trips and those available to the public through recreation.gov.<sup>2</sup> Many of these allocations were set decades ago in management plans that need to be updated. With advances in equipment and skill level, more and more people are capable of organizing their own trip and do not require the services of an outfitter and guide. The odds of securing a permit in the Four Rivers Lottery (Middle Fork Salmon, Main Salmon,

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<sup>1</sup> Opportunities to Improve Access, Infrastructure, and Permitting for Outdoor Recreation, Hearing before the Committee on Energy and Natural Resources, United States Senate, One Hundred and Sixteenth Congress, March 14, 2019, Senate Hearing 116-290, <https://www.energy.senate.gov/hearings/2019/3/full-committee-hearing-to-examine-opportunities-to-improve-access-infrastructure-and-permitting-for-outdoor-recreation>.

<sup>2</sup> Allocating River Use: a review of approaches and existing systems for river professionals, Prepared by Doug Whittaker, Ph.D. and Bo Shelby, Ph.D. Confluence Research and Consulting; July 2008, <https://www.river-management.org/assets/docs/Library/allocating%20river%20use-jan%202009.pdf>

Selway, and Snake Rivers) have been reduced from a 1-in-20 to a 1-in-80 chance in just the past few years. While some individuals have a means to buy a seat on an outfitted trip, the cost for this experience continues to increase, raising significant equity issues.

As the Committee considers future legislation on outdoor recreation and oversight hearings with agency witnesses, we request that the Committee work to ensure that opportunities to enjoy fully allocated rivers are equitably distributed with adequate opportunities for the public. In many cases this would require revisiting outdated river management plans, revisiting capacity limits and allocations based on modern social science, applying modern data analytics to assess demand and distribute user days accordingly, and providing sufficient appropriations to do this work.<sup>3</sup>

### **Environmental Justice in Recreation Permitting Act (S. 1269)**

American Whitewater supports S. 1269, the Environmental Justice in Recreation Permitting Act, introduced by Senator Cortez-Masto. Opportunities for river running have never been equitably distributed and opportunities exist to include conditions in special recreation permits issued to recreation service providers that address the need for equitable access to public lands and waters. In other cases, members of environmental justice communities may be seeking their own experiences on public lands and waters but the high cost of outfitting and guiding services and complexity of limited entry permit systems for fully allocated river systems is a barrier to entry for members of these communities.

Section 1(b) of the bill requires the Secretary of the Interior and the Secretary of Agriculture to complete an interagency report on the effects of special recreation permits on environmental justice communities. It further requires the agencies to provide recommendations for agency policy, or if necessary, action by Congress, to encourage and simplify public land access for recreation service providers serving environmental justice communities.

#### *Recommended Changes to Environmental Justice in Recreation Permitting Act (S. 1269):*

In addition to access provided by recreation service providers, the report should also include a section that evaluates special recreation permits for an area in which use is allocated, as

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<sup>3</sup> We have previously raised these issues with the Committee. See Written Testimony of Dr. Thomas C. O’Keefe, at page 8 at Opportunities to Improve Access, Infrastructure, and Permitting for Outdoor Recreation, Hearing before the Committee on Energy and Natural Resources, United States Senate, One Hundred and Sixteenth Congress, March 14, 2019, Senate Hearing 116-290, <<https://www.energy.senate.gov/services/files/CD2D1A1B-1825-4878-B9A3-D61160D978E2>>.

defined in Section 1(a)(4)(C)(ii) of the bill. This would include rivers or other locations managed by agencies with limited entry permit systems. As drafted, the bill assumes recreational opportunities sought by environmental justice communities would be provided by recreation service providers but this may not be the case in all situations and should be evaluated. We also believe the cost of experiences provided by recreation service providers should be evaluated as a potential barrier to participants representing environmental justice communities.

### **Federal Interior Land Media (FILM) Act (S. 1616)**

American Whitewater supports the intent of S. 1616, the Federal Interior Land Media (FILM) Act sponsored by Senate Barrasso that would result in a much needed update to 54 U.S.C. § 100905. Federal law has not kept pace with the development of new technologies (e.g. high quality smartphones, GoPros, etc.) that allow individuals to produce films with minimal equipment and a light footprint. Additionally the line between what constitutes commercial and non-commercial filming has blurred with the myriad of new channels for content distribution. Current federal law includes exemptions to permit requirements for commercial photography if the activity takes place where members of the public are generally allowed and does not utilize models or props that are not a part of the site's natural or cultural resources. This legislation would establish a corresponding set of exemptions for filming when six conditions are met, but it is important for individuals to understand and adhere to these requirements. Given impacts we have seen from even the smallest film crews (e.g. tree limbing or brush clearing to get a shot), we would support establishment of a system for education and accountability for film projects to ensure that all filmmakers understand the requirements. One way to do this would be through a no cost (or low cost) permit that individuals could obtain online; we believe that should be considered either in the legislation or through a public process prior to implementation of new requirements and exemptions.

### **Recreation Not Red-Tape Act (S. 1874)**

American Whitewater supports S. 1874, Recreation Not Red-Tape Act, introduced by Senator Wyden and co-sponsored by Senator Lujan. The Recreation Not Red-Tape Act includes several provisions that are of particular importance to the whitewater paddling community. Our comments below on Title I of Recreation Not Red-Tape Act (S. 1874) should also be applied to the corresponding sections of the Simplifying Outdoor Access for Recreation (SOAR) Act (S. 1229).

Title I, Section 102(d)

While American Whitewater supports revision of the Federal Lands Recreation Enhancement Act in ways that are not addressed by the legislation before the Committee, we fully support elimination of the sunset provision given that numerous short-term extensions have led to inefficiencies and uncertainty over federal land management.

Title I, Section 104(b):

American Whitewater supports language that allows outfitters to “voluntarily and temporarily return to the Secretary concerned one or more service days, to be made available to any other existing or potential permittee.” For special recreation permits, for an area in which use is fully allocated and a permit is required for all visitors, this would allow available service days to be made available to the public when not utilized by an outfitter.

Title I, Section 105(a)

We strongly support making information on availability of special recreation permits visible to the public through a transparent format on a website as well as an email notification system. This level of visibility will help everyone and take the administrative process associated with special recreation permits out of the backrooms of agencies ensuring that everyone has knowledge of where the agency might be making opportunities for special recreation permits available. A transparent notification process allows organizations like ours and the general public to track plans to issue new permits and raise any concerns early in the process. We believe this will enhance opportunities for public participation and engagement when the agency begins to consider new special recreation permits.

Title I, Section 107(a)

American Whitewater appreciates the careful wording of Section 107 on Forest Service permit reviews that an increase in actual use is “not to exceed the level allocated to the special recreation permit holder on the date on which the special recreation permit was issued.” This makes clear that a limit on allocation exists for special recreation permit holders consistent with underlying management plans.

Title I, Section 111(a)

We fully support changes to the Federal Lands Recreation Enhancement Act to “consult with the States to coordinate the availability of Federal and State Recreation Passes to allow a purchaser to buy a Federal recreation pass and a State recreation pass in the same transaction.” We routinely receive complaints from our members on the myriad of passes

that are often required in a small geographic area with different state and federal land management agencies that are typically not obvious or apparent to the public.<sup>4</sup>

#### Title I, Section 112

We fully support making the America The Beautiful Pass readily available for purchase including through online sales channels. We also support options for online payment of entrance fees and amenity fees.

#### Title I, Section 113

We appreciate careful language of this section to make clear that the bill does not affect concessions contracts for those providing services in National Parks and would therefore not create any new authority for the National Park Service to increase outfitter allocations on rivers like the Colorado in Grand Canyon National Park under any circumstances.

#### Title II

American Whitewater fully supports the language of this title to “ensure service members and veterans have access to outdoor recreation and to outdoor-related volunteer and wellness programs as a part of the basic services provided to service members and veterans.” We also fully support the provision to allow active duty members of the armed services the ability to “use not more than 7 days of a permissive temporary duty assignment or terminal leave allotted to the member to participate in a program related to environmental stewardship or guided outdoor recreation following deployment.”

#### Title III, Section 301

We support language in this section for federal land managers to “extend the recreation season or increase recreation use in a sustainable manner during the offseason.” The reality is this use is occurring but is not being actively managed. As an example, whitewater boaters who enjoy winter rains or the spring snowmelt engage in recreation that is not aligned with the typical Memorial Day to Labor Day summer recreation season. Too often we encounter locked gates, closed campgrounds, and areas that are not accessible during the peak of the whitewater boating season. Currently, “off-season” use is not being appropriately recognized or managed resulting in unacceptable resource impacts and safety concerns including sanitation issues or improperly parked vehicles. The bill provides direction for “improvement of access to the area to extend the season” and will provide better access to and management of opportunities that might take place outside of the summer recreation

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<sup>4</sup> An example of a trailhead sign illustrating 15 different possible passes and which ones fulfill requirements to park at a recreation site:  
<<https://www.americanwhitewater.org/content/River/view/river-detail/2123/gallery/889244>>.

season. Fully realizing the benefits of this section requires a commensurate increase in appropriations.

#### Title III, Section 302

We support adoption of recreation performance metrics for evaluation of land managers and strongly support inclusion of “quality of visitor experience” at Section 302(b)(2)(E) and “visitor satisfaction” at Section 302(b)(2)(G). Too often recreation is measured by the number of visitors or expansion of facilities. Opportunities to enjoy areas of low use levels, as well as access to high quality experiences for solitude and adventure, are important for many recreational experiences people seek; land managers who recognize this through their actions should be evaluated in consideration of this fact. Recreation is a core function of public lands with profound public benefits and, along with other uses of public lands, merits commensurate performance metrics.

#### Title III, Section 303

We strongly support inclusion of recreation to the mission of the Corps of Engineers, Bureau of Reclamation, Federal Energy Regulatory Commission, and Department of Transportation. All of these agencies have jurisdiction over management of land and water resources our members enjoy. Their management decisions and actions have the opportunity to enhance or limit recreation opportunities and the recreation economy.

#### Title III, Section 304

This section has several provisions that are of importance to the whitewater paddling community. We strongly support adoption of policy to manage for sustainable outdoor recreation uses and meaningful experiences in unique and varied landscapes as described in Section 304(a). We concur that identifying “Remarkable Recreation Attributes” that are defined by natural, cultural, or historic features and support high quality recreation opportunities as described in Section 304(b) should be a goal of land management planning. Section 304(f)(2) would require identification of these areas in the land management planning process and ensure that they are maintained for their recreational attributes. It is important to American Whitewater that this section focuses on the unique recreational attributes of locations on our public lands and waters and not just their popularity. Many backcountry destinations on public lands have unique and exceptional value even where use levels may be relatively low. A management framework that protects opportunities for these experiences is important.

#### Title IV

American Whitewater supports this title that would provide authority for cooperative agreements between organizations like ours and federal agencies. Authorized programs

could include on-the-ground projects like development or maintenance of a river put-in but also includes programs that “increase awareness, understanding, and stewardship of Federal land through the development, publication, or distribution of educational materials and products.” We believe this could provide new partnership opportunities for information sharing and coordination of recreational river resources.

*Recommended Changes to Recreation Not Red-Tape Act (S. 1874):*

Section 107(d)(2) states that temporary reassignment of use may be assigned to “another qualified recreation service provider.” American Whitewater seeks a change to this language to make it consistent with the language of Section 8(d)(2) of the SOAR Act (S. 1229) stating that temporary reassignment of use may be assigned to “any other existing or potential permittee.” This change would allow available service days for an area, in which use is allocated and a permit is required for all visitors, to be made available to the public when not utilized by an outfitter.

**Parks, Jobs, and Equity Act (S. 2258)**

American Whitewater supports S. 1269, the Environmental Justice in Recreation Permitting Act, introduced by Senator Hickenlooper and co-sponsored by Senators Padilla, Duckworth, Blumenthal, Van Hollen, Booker, Feinstein, and Murphy.

The legislation directs the Secretary of the Interior to establish a Parks, Jobs, and Equity Program to support job creation, economic revitalization, and park development for communities impacted by COVID–19.

Specific provisions in the legislation for acquisition of “land or water that will be used to provide outdoor recreation opportunities to the public” and providing resources to “develop or renovate outdoor recreational facilities that provide outdoor recreation opportunities to the public” could be used for access to rivers.

We work with many local parks and recreation districts who provide critical access to waterways and this program will support our efforts to partner with local agencies to develop facilities that meet important local needs.

**Outdoors For All Act (S. 2887)**

American Whitewater supports the Outdoors for All Act, bipartisan legislation sponsored by Senator Padilla with 21 co-sponsors. This important legislation serves to address equity



issues with respect to opportunities for outdoor recreation through establishment of “an outdoor recreation legacy partnership program under which the Secretary may award grants to eligible entities for projects.” Provisions of this program to “acquire land and water for parks and other outdoor recreation purposes in qualifying areas,” “develop new or renovate existing outdoor recreation facilities that provide outdoor recreation opportunities to the public in qualifying areas,” “engage and empower underserved communities and youth,” and “provide employment or job training opportunities for youth or underserved communities” will help us achieve goals of developing welcoming and inclusive spaces in the outdoors. The program will specifically benefit historically marginalized and low-income areas through dedicated funding.

### **Outdoor Recreation Act (S. 3266)**

American Whitewater supports the bipartisan effort of Chairman Manchin and Ranking Member Barrasso to introduce the Outdoor Recreation Act (S. 3266). We strongly support several sections of the bill and also provide a few recommended changes we view as essential to ensure final legislation is developed that appropriately balances recreation with natural resources and public safety. Our detailed comments are as follows:

#### **Title I, Section 101(d)**

We strongly support the provision of this section for the voluntary return of surplus service days to “any other existing or potential permittee.” For special recreation permits for an area in which use is allocated this would allow available service days to be made available to the public when not utilized by an outfitter.

#### **Title 1, Section 102**

We strongly support policy that fosters and encourages recreation on Federal land and an inventory and assessment during revision of land management plans that focuses on unique recreation values. It is important to American Whitewater that this section focuses on the unique recreational attributes of locations on our public lands and waters and not just their popularity. Many backcountry destinations on public lands have unique and exceptional value even though use levels may be relatively low. A management framework that protects opportunities for these experiences is important. We appreciate attention to benefits of both current and projected future recreation use including the impacts of this use on natural, cultural, and other resources as well as an assessment of the suitability for developing or expanding recreation. In some cases such development or expansion may be appropriate but in other places it may not. The important provisions of section 102(d)(2) ensure recognition of other uses of public lands and a robust opportunity for public input.

#### Title II, Section 202

We support federal assistance and a grant program to reduce the spread of Aquatic Invasive Species. We appreciate the language of Section 202(b)(2)(C) providing direction to “inspect watercraft in a manner that minimizes disruption to public access for boating and recreation in non-contaminated watercraft.” Locating check stations that are hidden behind administrative buildings and accessing facilities to decontaminate watercraft in the evening after standard business hours result in inconveniences that need to be addressed.

#### Title II, Section 203

We are strong supporters of improved recreation visitation data including data that can be provided in real time. Public demand for recreational opportunities is high and managing these activities in a manner that protects the environment and the social attributes of a high quality experience requires good data. Decisions on capacity and allocation and distribution of opportunities in an equitable manner can not be achieved without good data. For the public, understanding when a site is nearing capacity in real time is helpful in decision making—if visitors know the parking area is at capacity before they leave home they can plan a different activity and avoid further overloading an area that has no additional capacity.

#### Title III, Section 301

We support investments in gateway communities that will enable these communities to capitalize on their proximity to recreation amenities in building local economies.

#### Title III, Section 302

We support this section and development of new, successful models for community-supported outdoor recreation infrastructure opportunities.

#### *Concerns and Recommended Changes:*

#### Title I, Section 101(b)

We are concerned with the ambiguity of the wording of this section and potential unintended consequences. While we generally don't have concerns with use of picnic areas by outfitters and guides, “picnic areas” as well as the phrase “serving fewer than 40 clients” are both undefined and overly ambiguous. Would this section only apply to picnic areas that are signed and identified as such on Forest Service maps or would it apply to any day-use area on the Forest with picnic tables? Would serving 40 clients mean at one sitting or over the course of a year? We are aware of several small picnic areas where 40 clients on a daily basis, especially if more than one outfitter had that many clients, would have a significant social impact and result in user conflict with the public. On the other hand, 40 total clients over the course of the year would be a relatively minimal impact. We are also concerned that

this provision would have unintended consequences by requiring members of the public to have a permit for more sites. If an outfitter were using a picnic area under the provisions of this section and it resulted in unacceptable social impacts and user conflict, the obvious solution by the land manager would be to require all users to obtain a permit and reservation so the exemption for outfitters and guides would not apply.

#### Title I, Section 104

In many areas where our members recreate, they have reported resource impacts and safety concerns with unregulated target shooting. We appreciate the intent of this section to address the issue and provide designated shooting ranges. As drafted however, we are concerned that the legislation will not lead to the desired outcome and will only exacerbate resources impacts and safety issues and constrain the ability of agencies to manage these. We have a specific concern with Section 104(c)(2) that would limit the ability of the agency to close an area to recreational shooting if a designated shooting range is not available. While we appreciate the intent of this section to provide a designated shooting range on all public land units, the legislation includes no appropriation to implement this measure. We are concerned that the practical result will be that agencies will be unable to construct designated shooting ranges on some land management units and will then be unable to close high-use recreational areas to target shooting. We are also concerned with the language of Section 104(e)(2) stating that the agency “may not require a user to pay a fee to use a designated shooting range.” To the extent these facilities provide the standard amenities under the Federal Lands Recreation Enhancement Act, all Forest users should be treated equitably.<sup>5</sup> A lack of user fees could also result in a lack of agency resources for brass or lead clean up or other ongoing maintenance activities necessary to safely maintain these shooting ranges. We recommend that these provisions of Section 104 be removed from the legislation.

#### Title II, Section 201

Broadband service is generally not required or even desirable at many remote locations on public land where part of the attraction is leaving these connections behind. Limited available funds should be invested in basic maintenance of recreation sites and not in costly infrastructure to provide broadband service. For broadband service, we believe a more appropriate priority is providing internet connectivity to gateway communities representing limited broadband districts rather than focusing on costly new infrastructure at individual recreation sites.

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<sup>5</sup> 16 U.S.C. §6802(f)(4)(D): (i) Designated developed parking; (ii) A permanent toilet facility; (iii) A permanent trash receptacle; (iv) Interpretive sign, exhibit, or kiosk; (v) Picnic tables; and (vi) Security services.

#### Title II, Section 204

We support making appropriate travel management planning for motorized vehicle use on federal land a priority, for the benefit of the recreating public. However, we have concerns with this section as drafted. Section 204(a)(1) discusses designating areas as open, limited, or closed for non-motorized use. This appears to subject activities like paddlesports to travel management planning and could therefore create new authority to confine this activity to designated areas or routes. Section 204(b)(2) states that the agency “may evaluate and alter an existing designation,” which would appear to provide a mechanism to circumvent the public process associated with travel management planning. We are concerned with the language of 204(b)(4)(A) stating that the agency “shall increase multiple use recreation opportunities.” This language would appear to inappropriately limit the ability of the agency to reduce motorized recreation in areas where that use is having unacceptable ecological or social impacts.

#### Title III, Section 303

We support language in this section for federal land managers to “make efforts to make infrastructure available to accommodate increased visitation to the Federal land during shoulder seasons.” We wish to clarify that this applies to existing visitation which has increased in recent years and not just future potential increases in visitation. Whitewater boaters who enjoy winter rains or the spring snowmelt engage in recreation that is not aligned with the typical Memorial Day to Labor Day summer recreation season. Too often we encounter locked gates, closed campgrounds, and areas that are not accessible during the peak of the whitewater boating season. When “off-season” use is not appropriately recognized and managed, it can result in unacceptable resource impacts and safety concerns including sanitation issues or improperly parked vehicles. Section 303(a) calls for coordination with businesses, states, local marketing organizations, Indian Tribes, local governments, and institutions of higher education. We request that recreational user groups be included on this list of consulting parties. Similarly, agreements under Section 303(c)(1) should include recreational user groups and non-profit organizations and not just businesses. Fully realizing the benefits of this section requires a commensurate increase in appropriations.

#### Title III, Section 304

We are concerned with the language of this section that would allow private development of campgrounds on public lands, providing those developers with up to 30 years of exclusive use of the facilities. Campgrounds like Wilderness Gateway on the Lochsa River, Pine Flats Campground on the South Fork Payette River, or Pit River Campground on the Pit River are gathering places for our community and serve a diversity of users at a modest cost. Turning these places into private campgrounds would not be in the public interest. At a minimum this

section needs to include a process for public notice and comment on any proposal for private development of campgrounds. Decisions on significant changes to the infrastructure present and a new operations and management structure need to be made in the context of existing users and ensure equitable access to camping opportunities on public lands.

## **Conclusion**

On behalf of the whitewater paddling community, thank you again for holding this hearing and the opportunity to provide testimony on Environmental Justice in Recreation Permitting Act (S. 1269); Federal Interior Land Media (FILM) Act (S. 1616); Recreation Not Red-Tape Act (S. 1874); Parks, Jobs, and Equity Act (S. 2258); Outdoors For All Act (S. 2887); and Outdoor Recreation Act (S. 3266). We urge you to move these bills through the Committee and to the Senate floor to ensure opportunities for river based recreation and other activities continue to be made accessible for future generations to experience and enjoy.

Sincerely,

A handwritten signature in black ink, appearing to read "K. R. Colburn", written in a cursive style.

Kevin R. Colburn  
National Stewardship Director

A handwritten signature in black ink, appearing to read "T. O'Keefe", written in a cursive style.

Thomas O'Keefe, PhD  
Pacific Northwest Stewardship Director