

Advocacy Comments on DOI's Request for Comments and Information on Advancing Equity in Outdoor Recreation

On October 19, 2021 the U.S. Department of the Interior published a request for comment regarding implementation of EO 13985, on advancing equity in underserved communities. On November 18, 2021 the Office of Advocacy (Advocacy) filed a comment letter encouraging DOI to revise its policies to ensure greater equity for small businesses, small governmental jurisdictions, and small organizations and to adopt permanent strategies by which the agency will measure and increase equity within its policies and rulemakings. Advocacy made the following suggestions:

- DOI should offer opportunities for virtual participation in meetings and a variety of scheduling options including different times and days to accommodate schedules of commenters. DOI should also lengthen the time for written public comments so that all interested stakeholders have a chance to submit meaningful substantive comments.
- DOI should offer additional resources and education to those seeking historic designations, and to the communities these designations may impact so that there is greater transparency about the process and its impacts.
- NPS should offer additional agency guidance, trainings, and mentorship opportunities to small, disadvantaged businesses regarding the concessions contract bidding process. These resources will ensure that the process is approachable and inclusive.
- NPS should consider ways in which to assess commercial use fees so that they are not disproportionately burdensome to small businesses or consumers.
- The NPS permitting process for special events permits needs to be streamlined so that it is less lengthy, arduous, and costly.
- DOI should offer entry-level programs within the national park systems to attract new users and look to contract with new small businesses to ensure diversity and equity among vendors.
- DOI must consider the impacts of critical habitat designations on regulated entities and exclude areas that based on the science are not conducive to species conservation.

For more information visit Advocacy's web page at advocacy.sba.gov, or contact Prianka Sharma at (202) 205-6938 or prianka.sharma@sba.gov.

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