

November 1st, 2018

Chugach National Forest Supervisor Office  
Attn: Draft Land Management Plan  
161 East 1st Street, Door 8  
Anchorage, AK 99501



Submitted electronically at: [www.fs.usda.gov/goto/chugach/plancomments](http://www.fs.usda.gov/goto/chugach/plancomments)

**RE: NOLS Comments on Chugach National Forest Draft Land Management Plan and Draft Environmental Impact Statement**

Dear Ms. Downie,

Thank you for providing the National Outdoor Leadership School (NOLS) with an opportunity to comment on the Chugach National Forest's Draft Land Management Plan (DLMP) and Environmental Impact Statement (DEIS). The Chugach is an invaluable public resource for NOLS and the outdoor recreation community, and we appreciate your efforts and those of your planning team to engage and involve the public in the planning process.

The mission of NOLS is to be the leading provider of wilderness skills and leadership education that serve people and the environment. NOLS teaches a wide variety of courses in Alaska and around the globe, ranging from Leave No Trace classes, wilderness medicine, and the classic 30-day NOLS expedition courses, to entire academic semesters. Our core curriculum includes leadership, outdoor skills, environmental studies, risk management, and technical skills related to the course type, be it backpacking, mountaineering, whitewater boating, sea kayaking, wilderness medicine, among many others. In 2018 alone, over 28,000 students attended NOLS courses, resulting in 240,000 student days worldwide. NOLS students gain a sense of responsibility and stewardship for their public lands, and develop the ability to explore and experience these places while managing risk and reducing their impact on the environment.

**Comments on the Draft Environmental Impact Statement**

In NOLS' previous comments on the Proposed Revised Land Management Plan in 2016, our primary concern was with the management direction of the Nellie Juan-College Fjord Wilderness Study Area (WSA), specifically with regards to maintaining the wilderness character across the entire WSA. In the DEIS we are pleased to see that the Forest has included two alternatives (C and D) that prioritize a Wilderness recommendation for the majority of the WSA and significantly increase the number of acres managed as "Primitive" in the Recreation Opportunity Spectrum.

After reviewing the four alternatives proposed, NOLS would like to offer its support in favor of Alternative D. We believe this option provides the best guarantee of long-term protection for the WSA and Prince William Sound for individuals or groups seeking quiet, backcountry recreational opportunities specifically in the Prince William Sound. From our perspective, increasing the acreage of land managed for "primitive" recreational opportunities forest wide from 46% - 54% helps guarantee that future NOLS students will continue having immersive backcountry experiences where they can thrive as leaders in self-sufficient teams. Similarly, by recommending that the vast majority of WSA (97%) be recommended for Wilderness designation, Alternative D helps ensure that this landscape will remain protected for future generations to experience as it exists now.

The differences between Alternative C and D are understandable with regards to the management of recreation. NOLS' preference for D is based largely on the increased number of acres in the primitive class (approximately 43,295 more than in C) and an increase in the amount of wilderness recommended in the

Wilderness Study Area (3% more than alternative C) within our operating area. Alternative C and D both do a good job of considering the needs of different recreation user groups across the forest. They balance an increase in motorized winter access in the Cordova District while expanding primitive recreation across the Glacier District and sensitive areas of the WSA and Prince William Sound that have seen significant growth in use over the last few decades, primarily from commercial use of kayak supported camping. C and D are reasonable solutions that accommodate a wide range of recreational users across the Chugach.

## **Comments of the Draft Land Management Plan**

NOLS appreciates the Forest's efforts to map out a longer-term strategy for the management of the Chugach in its Draft Land Management Plan. As NOLS courses primarily operate in and around the WSA using kayaks, our comments below are tailored most directly to the future management of the WSA and the Prince William Sound in the Glacier District.

### **Prioritize Maintaining the Wilderness Character of Prince William Sound**

NOLS students and instructors will attest that Prince William Sound is one of the most outstanding wild recreational landscapes in the world. It is the combination this area's epic scenery, abundant wildlife, pristine waters, and ancient forests that continues to draw both operators and visitors to this environment. For these reasons we support the Forest's broad goals for the *geographic area desired conditions* outlined on page 20 of the DLMP to maintain the wildness and natural qualities of this unique place.

*"National Forest System lands within the Prince William Sound Geographic Area maintain the natural qualities and ecological processes of the area. Human access remains almost exclusively by boat or aircraft, with the exception of road-accessed portals of Whittier and Valdez." ( DLMP pg. 20)*

However, as the Forest works to realize these desired conditions over the course of the land management plan, it will undoubtedly contend with increasing levels of use in formerly remote areas of the WSA and Prince William Sound because of infrastructure, such as the Whittier tunnel, that did not exist decades ago. NOLS' position as a long standing outfitter on the Chugach is that the increased visitation and use of the WSA and the surrounding waters necessitates continued protection, not less, if we hope to preserve the qualities mentioned above that make the PWS an internationally acclaimed recreation destination. It is valuable to recognize that existing private and commercial recreation within the WSA is consistent with the wilderness character. To this end, we are encouraged by the management direction both the DLMP and Alternatives C and D in the DEIS to provide this needed protection.

### **Carefully Consider Any Future Stipulations on Commercial Recreation Permittees**

One point concern for NOLS in the DLMP that has consequences for all guides and outfitters operating on the Chugach are future stipulations designed to minimize commercial recreation impacts. The following sentence addresses the potential for these stipulations after the approval of the Forest Plan on page 50 of the DLMP.

*"Within 2 years of forest plan approval, review wilderness study area outfitter and guide special use permit clauses and operating plans to determine if new stipulations are needed to minimize commercial recreation impacts on the area's presently existing character and its potential for inclusion into the National Wilderness Preservation System." (DLMP pg. 50)*

It has been NOLS' experience operating across public lands throughout the United States and around the world that not all group types are created equal in terms of their impact. If the Forest considers future stipulations on commercial recreation permittees, such as group size restrictions or length of stay requirements, we hope that it will (1) take into careful consideration the unique operating profiles of different permittees and (2) make decisions to reduce impacts based upon the best available science.

In recent years, NOLS has noticed a trend among public land managers to impose stricter group size requirements in wilderness areas, often without fully considering the advantages and limitations of imposing

group size requirements. There is not a direct correlation between group size limits and impacts to the wilderness experience; camping ethics and traveling styles, such as those adhered to by Leave No Trace practitioners such as NOLS, make a much bigger difference.<sup>123</sup> Constraining group sizes also limits access for the public to educational non-profit permittees, who must raise tuition to cover the increased per-student cost of the course. Within the Chugach, the current group size limitation of 15 people in Management Area 1, “primitive areas,” is an acceptable maximum. Impacts from this group size can be minimized by strictly adhering to, and educating around, Leave-No-Trace principles.

### **Continue to Emphasize the Value of the Outdoor Recreation Economy**

NOLS believes it is important to recognize and address the role of sustainable outdoor recreation as an economic driver in its land management planning. As we have seen through reports such as a recent 2018 publication by the U.S. Department of Commerce, the value of outdoor recreation as a proportion of our economy has been increasing, in the process creating new jobs and backfilling the holes left following the exit of extractive industries in many rural communities.<sup>4</sup> The Chugach National Forest has a major role in facilitating the recreation economy for Alaska’s businesses and communities that is estimated to provide over 72,000 direct jobs and account for \$7.3 billion in consumer spending annually.<sup>5</sup> Going forward in the planning process, NOLS hopes that the Forest will continue to promote both direct and indirect economic contribution of recreation from commercial and non-commercial activities.

Specifically, increasing attention must be given to valuing the indirect benefits of recreational activities that the Chugach supports. These are benefits such as induced spending on other goods and services needed to support recreational activities and improved community health outcomes from exposure to recreation and nature. Quantifying these values economically is challenging, yet increasingly important and forward thinking as it becomes clear how significant they are for society. Certainly, making a commitment to think about the benefits of recreation more expansively will help paint a better picture of its true value on the Chugach National Forest.

NOLS sees itself as a partner in helping the Forest achieve its goals described in the DLMP. In many ways our goals and priorities are aligned as we look to educate the next generation of recreational users on their public lands and Alaska’s epic landscapes. Thank you for the consideration of our comments. Please don’t hesitate to contact us with any questions.

Sincerely,



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<sup>1</sup> Koesler, R. (2000). Group Size and the Wilderness Experience.

<sup>2</sup> Monz, C., Roggenbuck, J., Cole, D., Brame, R. & Yoder, A. (2000). Wilderness Party Size Regulations: Implications for Management and a Decision making Framework. USDA Forest Service Proceedings RMRS-P-15-VOL-4

<sup>3</sup> Roggenbuck, J. & Yoder, A. (1999). Group Size and Experience Impacts in Wilderness.

<sup>4</sup> Outdoor Recreation Satellite Account: Updated Statistics for 2012 - 2016. Bureau of Economic Analysis.

<https://www.bea.gov/news/2018/outdoor-recreation-satellite-account-updated-statistics-2012-2016>

<sup>5</sup> Outdoor Industry Association. Outdoor Recreation Economy for Alaska 2017. <https://outdoorindustry.org/advocacy/>