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Chugach National Forest Supervisor's Office

Attn: Forest Plan Revision

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Anchorage AK 99501

Sent via email to: chugachplanrevision@fs.fed.us

Re: Comments on the Proposed Revised Land Management Plan (12 pgs)

Dear Supervisor Marceron,

Thank you for providing the National Outdoor Leadership School (NOLS) with an opportunity to comment on the Chugach National Forest's Proposed Revised Land Management Plan. 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 2014, 21,083 students attended NOLS courses, resulting in 217,559 student days worldwide. NOLS students gain a sense of responsibility and stewardship for their public lands, and develop the ability to explore and experience our public lands while managing risk and reducing their impact on the environment.

We are concerned that the Proposed Revised Management Plan weakens existing protections and management direction for the Nellie Juan-College Fjord Wilderness Study Area (WSA). The NOLS business model relies on the rich outdoor adventure and educational opportunities provided by the WSA's rugged landscapes and remote and wild coastline. Impacts to wilderness character compromise the experiences of our students and degrade our ability to operate classes in the WSA. These operations, and specifically our sea kayaking courses, are a critical component of NOLS Alaska operations. The quality of the wilderness creates the opportunity for us to offer phenomenal experiences to students, and likewise creates economic opportunity for numerous other guides and outfitters who depend on the protections of the WSA to offer pristine, remote, and wild experiences for their clients. We provide greater detail on our operations and specific concerns with the proposed plan in the sections that follow.

Overview of NOLS Alaska and Chugach Operations

The National Outdoor Leadership School celebrated its 50th anniversary in 2015. NOLS has held courses on the Chugach National Forest since 1971 and is the one of largest commercial outfitter operating in the Prince William Sound. Currently, NOLS runs nineteen sea kayaking courses and 2 backpacking courses on the Chugach

National Forest each year. In FY2015 NOLS logged 1,580 user days on the forest.

As an established long-term operator, NOLS understands and values the diverse experiences available in this unique landscape. Despite the scale of our operations, our courses have a small footprint; we led the development of the Leave No Trace ethic, and all of our courses actively teach and practice these principles to the highest standard. The Chugach stands apart as a crown jewel of the National Forest system, offering some of the most wild and remote coastline in the country and preserving unique temperate rainforest and active glacial fiords. We look forward to seeing its wilderness values maintained and improved upon in the revised Land Management Plan.

Outdoor recreation as a whole is a significant contributor to the Alaskan economy. According to a study by the Outdoor Industry Association in 2012, the outdoor recreation industry generates \$9.5 billion in direct consumer spending annually to Alaska's economy. Outdoor recreation supports 92,000 jobs, amounting to \$2.6 billion in wages, and generating \$711 million in annual state and local tax revenue. As the largest commercial operator in Prince William Sound, NOLS contributes significantly to the Alaskan economy.

In fiscal year 2015, NOLS Alaska paid \$930,755 in annual payroll for 3 full time and 40 seasonal staff, and 120 seasonal field instructors. The school spent \$244,139 on food and \$23,242 on vehicle maintenance. It is important to note that these expenses were for all operations out of the NOLS Alaska campus, not solely those incurred on the Chugach. Additionally, NOLS spent \$19,459 for private services on the Chugach for transporting courses by a local charter company.

Comments on the Proposed Revised Management Plan

The primary concern for NOLS Alaska operations on the Chugach is the management of the Nellie Juan-College Fiord WSA. The vast majority of our Chugach operations are extended sea kayaking courses in Prince William Sound, and these courses depend critically on the wild qualities of the WSA (see Attachment A for a map of our operations). We advocate for an elevated focus on managing the WSA to preserve its wilderness characteristics in the face of increasing use and visitation. As was pointed out in a previous letter submitted in the Assessment Phase (Attachment B), significant increases in visitation and usage of the WSA resulted from population growth and completion of the Anton-Anderson Memorial Tunnel since completion of the 2002 Management Plan.

We wish to emphasize two main points:

- 1)The entire Nellie Juan-College Fiord WSA is worthy and deserving of wilderness recommendation and designation.
- 2)It is the duty of the Chugach National Forest to manage the WSA as wilderness, as defined by the Wilderness Act and a clear and proper interpretation of the activities allowed under the Alaska National Interest Lands Conservation Act, in order to fully preserve its wilderness characteristics until acted on by Congress.

We do not support the current plan's direction to allow increases in activities that would degrade wilderness characteristics of the WSA. It is the responsibility of the Chugach National Forest to preserve the existing wilderness character of the entire WSA until it is either released or designated wilderness by an act of Congress. We believe proper management of Nellie Juan-College Fiord WSA requires a strengthening of resolve and a renewed effort of education and enforcement of the existing regulations and management direction. The increased visitation and use of the WSA and the surrounding waters necessitates continued protection, not less, if we hope to preserve the multitude of fish, wildlife, wilderness, scenery, and recreation that make the Prince William Sound an unparalleled resource.

We provide detailed comments on the Proposed Revised Land Management in the sections that follow.

1. Clarification of language - Management Areas, MA 1 Wilderness Study Area, Management Intent (p.44)

The language used in Part 3 - Management Area Management Description to describe the Management Intent of the Wilderness Study Area is unclear and could be misinterpreted in its current form. The statements of concern include,

"The WSA is not a Conservation System Unit under ANILCA,"

and,

"Management of the WSA will follow the direction provided by ANILCA to the extent consistent with law until Congress determines otherwise."

The first statement is true, but could be confusing for the public. The WSA is technically not a Conservation System Unit, but it is managed to the standards of designated wilderness; though it is not part of the Conservation System, it is managed to the same standards and with the same regulations. The current language without further explanation could be interpreted otherwise.

The wording of the second statement creates a circular reference regarding the management of the WSA. ANILCA sec. 707 specifically defers to the stipulations of the Wilderness Act to guide management of WSAs, with the exception of additional wilderness management provisions created by ANILCA relating to specific subsistence uses and critical management actions. We recommend replacing this statement with wording from the Alaska Region FSM 2300, such as,

"Manage designated wilderness and the wilderness study area to meet the spirit and intent of the 1964 Wilderness Act, while recognizing and allowing for specific exceptions authorized in ANILCA," (Sec. 2320.2 - Objectives)

or,

"Except as otherwise expressly provided for in ANILCA, wilderness shall be administered in accordance with applicable provisions of the Wilderness Act (ANILCA, Section 707). Hence, the provisions of both Acts must be considered together, and the direction in FSM 2320 will apply, except as modified in this supplement... Subject to valid existing rights, the wilderness study area shall, until Congress determines otherwise, be administered to maintain presently existing character and potential for inclusion into the National Wilderness Preservation System. Management of the study area will follow the same direction provided for wildernesses established by ANILCA, to the extent consistent with law." (Sec. 2320.3 - Policy)

We believe these changes to the wording will provide greater clarity for managers and for the public. The language of the Management intent, and of the Proposed Revised Plan in general, should be as clear and precise as possible to effectively guide management of the Chugach National Forest for the foreseeable future.

2. Recent wilderness impacts and changes from Anderson Tunnel

The substantial increase in motorized vessel traffic following the opening of the Whittier Tunnel has impacted NOLS Alaska sea kayaking course areas within Prince William Sound and the WSA, and we now charter motorized transport out of the Passage Canal to avoid the heaviest boat traffic and improve the wilderness experience for the students. There are yet vast areas of coastline to find true wilderness experiences, like

navigating the surrounding waters of Knight Island, upper Columbia Bay and the upper Nellie Juan River drainage. The experiences of our students is jeopardized by the increasing wilderness disturbance, especially related to illegal and excessive cutting and clearing of coastal campsites by recreational users of the WSA. Our students routinely state that the most valuable part of their course was the remoteness and wild, natural beauty of Prince William Sound.

With the wilderness experience at risk due to increasing use, it is vital to maintain and protect the biological, cultural, recreational, and economic resources of the WSA. We encourage the forest service to propose an operating plan that documents procedures to minimize impacts on wilderness experience without unreasonably limiting the access and operations of permitted outfitters. Such a plan should include an improved education and outreach campaign regarding proper conduct in the WSA, and stronger enforcement of existing regulations.

3.Management of WSA as designated wilderness

The Proposed Revised Plan in its current form appears to loosen management direction of the Wilderness Study Area from the previous plan. Referencing Table 6 of the Proposed Revised Plan (p.42) and the Wilderness Study Area Management Area - Activities Table of the 2002 Plan (p.4-13), the changes of concern include:

- ?Wildlife Habitat Projects: Changed from Not Allowed (2002 Plan) to Suitable Use (Proposed Plan)
- ?Soil/Watershed Projects: Changed from Not Allowed (2002 Plan) to Suitable Use (Proposed Plan)
- ?Fish Habitat Projects: Changed from Conditionally Allowed when consistent with management intent, standards, and guidelines (2002 Plan) to Suitable Use (Proposed Plan)
- ?Personal Use Timber Harvest: Changed from Not Allowed (2002 Plan) to Suitable Use (Proposed Plan)
- ?Forest Service Recreational Cabins: Changed from Conditionally Allowed when consistent with management intent, standards, and guidelines (2002 Plan) to Suitable Use (Proposed Plan)

ANILCA established Nellie Juan-College Fiord as a Wilderness Study Area "In furtherance of the purposes of the Wilderness Act" (ANILCA, sec. 704). ANILCA sec. 707 deferentially refers to the Wilderness Act to define the management of Wilderness areas, stating,

"Except as otherwise expressly provided for in this Act wilderness designated by this Act shall be administered in accordance with applicable provisions of the Wilderness Act governing areas designated by that Act as wilderness..."

In further clarification, Forest Service Manual 2300 - Recreation, Wilderness, and Related Resource Management for the Alaska Region states,

"Subject to valid existing rights, the wilderness study area shall, until Congress determines otherwise, be administered to maintain presently existing character and potential for inclusion into the National Wilderness Preservation System. Management of the study area will follow the same direction provided for wildernesses established by ANILCA, to the extent consistent with law." (emphasis added).

Should the aforementioned activities move forward as currently stated, we request additional clarification in their definitions. For example, the current definition for Personal Use Timber Harvest in the Proposed Revised Plan could allow activities in exceedance of the subsistence use of timber provided by ANILCA, and would likely result in further degradation of the WSA in violation of the Wilderness Act. The other four management activities also require further definition and clarification to ensure activities in the WSA don't exceed the limited subsistence uses and as-needed management activities provided by ANILCA beyond the conventional restrictions of the Wilderness Act.

The Forest Plan emphasizes the ecological value of the existing tree species, their diversity, and the uniqueness of the forests (Proposed Revised Plan Part 1- Resource and Management Vision, Unique Physical and Biological

Characteristics). Allowing personal use timber harvest beyond the limited subsistence use provided by ANILCA is counter to the Plan's stated purpose of preserving wilderness character, and degrades the experience for recreational users. Activities like timber harvest also degrade the resiliency of the forests and ecosystems to stressors like climate change and extreme weather events. The western Prince William Sound has already been impacted by weirs, fish ladders, small dams, and fish hatcheries, altering the potential for the diverse ecosystem to maintain its natural resilience.

Under ANILCA 1315b fishery projects must be done in a way that minimizes impacts to wilderness character. Any fishery projects that require removal of timber would have additional impacts to the wilderness character, the ecosystem, and diversity. The appropriate subsistence uses and the situations where they are necessary are clearly described by ANILCA and FSM 2300 ch.2302 for the Alaska Region.

Specific aquaculture projects, including those that are for fish habitat improvement, are conditionally permitted to take place in USFS wilderness under ANILCA (sec. 1315) to the extent that they maintain, enhance, or rehabilitate fish stocks. Should the developments proceed, we wish to stress the importance of minimizing impacts to the wilderness character as prescribed in ANILCA sec. 1315.b. stating,

"Any fish hatchery, fishpass or other aquaculture facility authorized for any such area shall be constructed, managed, and operated in a manner that minimizes adverse impacts on the wilderness character of the area. Developments for any such activities shall involve those facilities essential to these operations and shall be constructed in such rustic manner as to blend into the natural character of the area. Reasonable access solely for the purposes of this subsection, including temporary use of motorized equipment, shall be permitted in furtherance of research, management, rehabilitation and enhancement activities subject to reasonable regulations as the Secretary deems desirable to maintain the wilderness character, water quality, and fish and wildlife values of the area."

Among the proposed plan's management directions is the intent to keep functional ecosystems intact and "to allow natural ecological processes to occur with limited human influence. These include terrestrial ecosystems (soils, vegetation, and wildlife), aquatic ecosystems (freshwater and coastal marine), and the interface between the two (riparian areas and wetlands)." Any wildlife or fish habitat or population improvement projects in the WSA should have a strongly demonstrated need and benefit demonstrated by rigorous study, and preserving wilderness character, or keeping impacts to an absolute minimum, should remain the highest priority and value. Relatedly, the proposed plan defines the Desired Conditions for the WSA,

"The WSA is a defining feature of western Prince William Sound where visitors find opportunities for solitude, remoteness, closeness to nature, and self-reliance in a natural environment of coastal rainforests and tidewater glaciers. The WSA supports subsistence uses, a robust recreation and tourism economy, and a commercial fishing industry while maintaining its wilderness character" (MA 1-DC-01)

4. Wilderness recommendation

We resolutely believe the entire WSA depicted in current management maps should be recommended for wilderness designation. The 2002 Management Plan Record of Decision recommended wilderness to Congress for approximately half of the current WSA, excluding significant areas with incredible wilderness characteristics and deserving of protection. Among those excluded from the recommendation but found to have significant wilderness character in the 2015 Chugach National Forest Wilderness Area Inventory and Evaluation include the upper Columbia drainage, Glacier Island, and Port Wells of the College Fiord Inventoried Area, Knight Island of the Prince William Sound Inventoried Area, and Lake Nellie Juan and Main Bay of the Nellie Juan Inventoried

Area.

All of these areas were determined by the 2015 wilderness study to provide high to outstanding opportunities for solitude and primitive recreation, a high degree of natural ecological function, spectacular scenery, significant fish and wildlife resources, and very few or minor impacts by development and activities incompatible with wilderness. We strongly recommend these areas be included in a new wilderness recommendation. Preservation of the WSA and minimization of human impacts directly support the proposed Forest-Wide Management Direction- Goals and Desired Conditions for ecological, social and economic sustainability. The wilderness character of these lands and the greater WSA creates the opportunity for the thriving tourism and outdoor recreation that the region's economy depends upon, and the wilderness protections sustain the fish, wildlife, and forests that support our subsistence and traditional uses.

We appreciate the efforts of the planning team in developing the Chugach National Forest proposed revised management plan. Our comments and suggestions are intended to help refine the management of the unparalleled resources and experiences found in the Chugach and the Nellie Juan-College Fiord Wilderness Study Area. We welcome any opportunity to discuss our

comments and engage in the planning process further. Thank you for your time and consideration of our comments.

Sincerely,

Janeen Hutchins

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Attachments (2): A. Map of NOLS Operations in the Prince William Sound; B. Comment Letter from Phase I of the Forest Plan Revision

