

November 19, 2014

Robert Bonnie
Under Secretary for Natural Resources and Environment
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

RE: Tongass National Forest – Recreation Program

Dear Under Secretary Bonnie:

Since the Tongass National Forest issued its first special use permit for recreation in 1978, commercial outfitting and guiding on the forest has grown significantly. Today, over 200 businesses hold special use permits for outfitting and guiding. We are a core part of southeast Alaska's tourism industry which contributes to the economy by providing thousands of jobs and generating \$1 billion in annual spending. Additionally, the special use fees we pay on a per client basis to access public lands are part of the largest source of revenue for the Tongass National Forest.

In return, the tourism and guiding industry relies on the Tongass National Forest recreation program. With nearly 80 percent of the land in southeast Alaska contained within the boundaries of the Tongass, our business operations and sustainable growth depend upon the agency's ability to effectively and fairly manage the recreation program and resources.

Counter to the growth in our industry and its importance to the economy, the Forest Service's investment in recreation on the Tongass has plummeted. A recently released Region 10 Leaders Intent document indicates that due to the severe decline in funding the Forest Service will no longer be able to provide for the same level of recreation experiences and opportunities, or maintain the current inventory of cabins, trails and other recreation facilities currently in place. What concerns us the most is that even at current levels of funding, the lack of resources for and efficiency within the Forest Service recreation program are failing to meet the needs of the recreation and travel industry.

Recently a small, informal group representing businesses conducting remote or shoreline operations in the Tongass National Forest met by teleconference to discuss issues related to the agency's recreation program and infrastructure. The participants in the discussion included representatives from small ship companies, air service operators, and professional hunting interests. Combined, our businesses provide professional travel, guiding, and interpretive services to thousands of visitors allowing them to experience remote areas in our nation's largest national forest.

The issues of common concern identified by the group are outlined below. While the topics raised on the call were specific to the businesses participating in the discussion, we believe they are also representative of the issues facing the broader recreation and travel industry in the Tongass. Additionally, underlying most if not all of the identified issues was the lack of allocated funding and personnel necessary to efficiently and effectively manage for existing commercial recreation use and increasing demand.

Special Use Permitting

- Timeliness: A lack of timeliness in issuing permits or approving annual operating plans for multi-year permits often results in companies receiving authorization for operations just prior to, or in some cases after, operating seasons have begun. This lack of certainty in advance of a season may unnecessarily result in companies failing to meet their commitments to clients. Strong and

competitive market conditions in the tourism industry require businesses to make investments in operations and commitments to clients at least 1 year, and often times multiple years, in advance of an operating season.

- Capacity and Flexibility: A lack of capacity and flexibility in authorizing commercial recreation access is hampering industry and economic growth. As demand for guided/remote access increases, current special use permit holders are seeking to expand or diversify their operations and new companies are seeking to enter the market. In many cases, requests for increased capacity at existing or new locations are denied simply due to the lack of resources needed to review, evaluate, and/or process requests. In some instances, the inability to sustainably manage increased demand has resulted in an overall reduction of access for users.

Infrastructure

- Deterioration of existing infrastructure and landscapes: The poor condition of the existing system of remote trails and facilities as well as the impacts of concentrated use in unmaintained and some undeveloped sites is limiting public access throughout the Tongass. As conditions of trails deteriorate, operators have limited or eliminated guiding the public on developed but unmaintained trails due to safety concerns. Likewise, the Forest Service has closed commercial access to trails or use areas because of poor conditions. For areas with consistent or increased demand for access the lack of infrastructure improvement or authorization for operators to use alternate areas constrains access and industry growth, increases risks associated with public use, and increases the potential for impacting natural resources.
- New infrastructure: A near moratorium on planning, design, and construction of new trails and facilities fails to meet existing or anticipated increased demand for remote recreation sites. In areas where demand for commercial access is high and increasing, it is crucial that the Forest Service be willing and able to work with stakeholders to evaluate if and where the development of new trails is warranted to meet existing use, strategically disperse use and decrease the potential for user conflicts in remote areas, and/or minimize impacts on the natural environment.

Partnerships

- Mechanism for partnerships: At present, there is no consistent mechanism for leveraging private investment to support Forest Service projects and service. While there are varying levels of interest and capacity within the business community to support public/private partnerships, in the past offers to provide private resources to undertake specific projects have been rejected by the Forest Service for reasons including the cost of processing partnerships or lack of personnel or expertise within the agency to execute a partnership project. Alternately, private interests have declined to invest resources when no equitable return on investment is foreseen.
- Consistency and fairness: Partnerships which leverage private funds to cover or supplement Forest Service recreation services or projects must avoid establishing a system which displaces existing operators or inadvertently favors businesses that are able or willing to invest above and beyond their standard fee for use. For example if funds are supplied to help place have Forest Rangers conduct interpretive program in the field, then those Rangers should be a resource for all commercial operators and the public while they are in the field.

Communication and Coordination

- Centralized Communications: There is a significant gap in centralized, forest-wide communication and coordination with the outfitting/guiding community. In part this issue is a result of permit administration being conducted at the district level with limited centralized outreach to inform or engage special use permit holders in discussions at the Forest level such as the Leaders Intent report, “niche” strategy, and decisions about fee grant program. The communication gap is particularly relevant to businesses which operate on multiple districts but whose permit is managed through a single district.

- Consistency: District-by-district management of commercial recreation results in a high level of inconsistency in communication as well as administration of permits. Core elements of outfitting and guiding management such as permit stipulations, standard and guideline implementation, capacity for commercial access, and partnership opportunities are inconsistent from district-to-district. The lack of consistency serves as an obstacle for businesses operating in multiple districts. Additionally, the inconsistency impacts the potential for successful models of permit administration and partnerships to be implemented throughout the system.

We respectfully request that the Forest Service consider the issues we have raised and work with us and other stakeholder to address them. We recognize that the topics outlined are presented as problems and look forward to working with you to determine constructive solutions which benefit the tourism industry, support local economies, and enhance the Tongass recreation program.

Sincerely,

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cc: Beth Pendleton, Alaska Regional Forester
Forrest Cole, Tongass National Forest Supervisor