



## National Outdoor Leadership School

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*The Leader In Wilderness Education*

October 26, 2012

Kurt Rausch  
Branch Chief, Contract Management  
NPS Commercial Services Program  
1201 Eye Street, NW, 11th Floor  
Washington, D.C. 20005

### **Re: Comments on the “Draft Final National Park Service Healthy and Sustainable Food Choice Guidelines for Backcountry Operations”**

*Sent via email to [kurt\\_rausch@nps.gov](mailto:kurt_rausch@nps.gov)*

Dear Mr. Rausch,

Thank you for providing the public with an opportunity to comment on the final draft of the *National Park Service Healthy and Sustainable Food Choice Guidelines for Backcountry Operations*. The selection and preparation of exceptional meals on National Outdoor Leadership School (NOLS) courses is a notable point of pride among instructors and students alike. We are therefore quite interested in guidelines that may impact the cooking- and eating-associated culture of our trips.

NOLS runs numerous course types of varying duration on National Park Service lands. River trips, climbing camps, backpacking excursions and mountaineering expeditions can last from 12 to 30 days, with widely varying rationing strategies, all of which would appropriately be considered strenuous. Each of these course types place significant caloric demands on their participants. We operate in numerous parks and monuments: Grand Teton National Park, Dinosaur National Monument, Colorado National Monument, Devils Tower National Monument, Grand Canyon National Park, Mount Rushmore National Memorial, Yellowstone National Park, Big Bend National Park, Joshua Tree National Park, Olympic National Park, North Cascades National Park, Mount Rainier National Park, Gates of the Arctic National Park, Denali National Park, Wrangell-St. Elias National Park, and the Noatak National Preserve.

Over the years, NOLS has refined and revised our backcountry cookbook, the *NOLS Cookery*, several times. We have calculated the nutritional information of each recipe and included that information in editions of the *Cookery*. We have created companion guides, such as *Backcountry Cooking* and *Backcountry Nutrition* to help travelers prepare menus and understand nutritional requirements in a remote setting. Through our sustainability initiative, we have developed guidelines for purchasing food, which place an emphasis on procuring organic, local and minimally processed goods. Students on NOLS courses learn to cook delicious meals from scratch on camp stoves including pizza, cinnamon rolls, and Thai curry. Students often return from a NOLS course

with a better sense of how to cook – skills that are easily transferred to their traditional environments.

While we think the pursuit of healthy foods and healthy eating habits is worthwhile and laudable, we do not support tying a nutritional obligation to concessionaires' contracts. The statement within the Guidelines, that "These guidelines should be used to determine requirements for new contracts, following an analysis of what is technically and economically feasible and appropriate given services, location and other factors specific to the contract," is therefore problematic. Concessionaire contracts are already quite complex, and have significant associated reporting requirements. The NPS has a careful balancing act to maintain, preserving park resources, providing opportunities to park visitors, and creating an environment that is not overly burdensome on commercial outfitters. Establishing a contractual obligation that limits the types of food that should be included on a backcountry expedition by outfitters exceeds the reasonable regulatory environment that the National Park Service should be striving to establish.

While NOLS has the ability to contribute more resources to nutritional concerns than other, smaller operations can, we are not exceptional. Outfitters in general are mindful of the nutritional requirements of their clientele, as specific dietary requirements become more prevalent, and as the expectations of clients evolve. No additional enforcement or additional documentation by NPS should be necessary. It is appropriate to establish guidelines, but those guidelines should remain voluntary.

Eating right is just one aspect of healthy living – being active is another important aspect. NOLS is already providing a path to a better lifestyle for students on NPS lands, by giving them the hard skills they need to engage in active outdoor pursuits. Additional contractual obligations are unnecessary. Please contact us if you would like further details, and thank you very much for your consideration of this feedback.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Bannon". The signature is fluid and cursive, with a large initial "A" and "B".

Aaron Bannon

NOLS Environmental Stewardship and Sustainability Coordinator.