



United States
Department of
Agriculture
Tongass
National Forest
R10-MB-711
May 2010



Petersburg Outfitter and Guide Management Plan

Decision Notice and Finding of No Significant Impact





Crystal Mountain, Mitkof Island. Photograph by Marina Whitacre.

Cover photo: View from Raven's Ridge on Mitkof Island. Sukoi Islands in Frederick Sound with the Coast Range in the background. Photograph by Marina Whitacre.



United States
Department of
Agriculture

Forest
Service

Alaska Region
Tongass National Forest
Petersburg Ranger District

P.O. Box 1328
Petersburg, AK 99833-1328
Phone: (907) 772-3871
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File Code: 1950-1

Date: May 27, 2010

Dear Planning Participant:

Enclosed is your copy of the Decision Notice and Finding of No Significant Impact (FONSI) for the Petersburg Outfitter and Guide Management Plan, Petersburg Ranger District, Tongass National Forest. As District Ranger, I am responsible for this decision. The Decision Notice explains my decision to select Alternative 2 and the factors considered in reaching this decision.

The Petersburg Outfitter and Guide Management Plan Environmental Assessment (EA) was distributed for public comment on January 7, 2010. The second 30-day comment period ended March 15, 2010. The District received comments from eight respondents. Excerpts from the comments, followed by my response, are provided in Appendix A of this document.

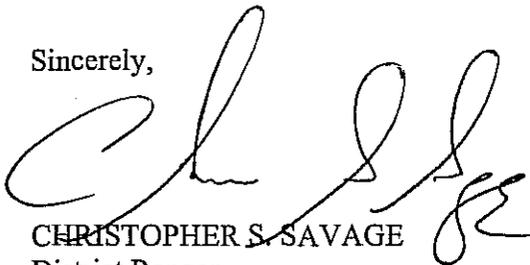
Individuals or non-federal organizations who submitted written comments or otherwise expressed interest in this particular action during the comment period have standing to appeal this decision (36 CFR 215.6). Appeals, including attachments, must be filed within 45 days following the date of publication of the legal notice of this decision in the *Petersburg Pilot*, the newspaper of record (36 CFR 215.7). If no appeal is filed, implementation of my decision may occur on, but not before, the fifth business day following the close of the appeal-filing period (36 CFR 215.15).

Copies of the EA, Decision Notice, and FONSI may be obtained from the Petersburg Ranger District office, located in Petersburg, Alaska, or by calling (907) 772-3871. The documents are also available online at

http://www.fs.fed.us/r10/tongass/projects/nepa_project.shtml?project=26239.

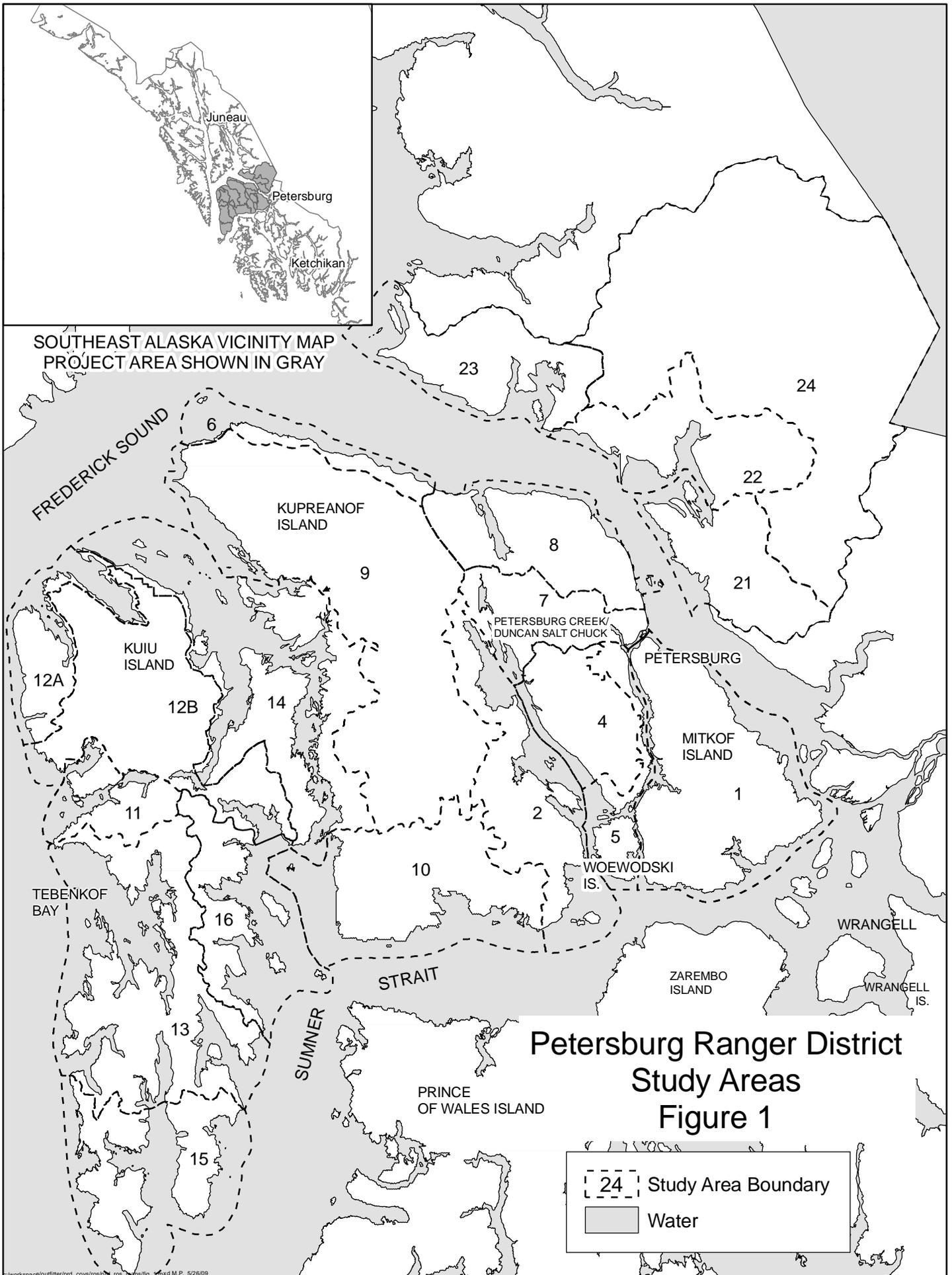
I want to thank those of you who took the time to review and submit comments during this project's development. Hearing views of the public and other agencies is vital to making an informed and reasonable decision. Your interest in the management of the Tongass National Forest helps make living in southeast Alaska better for everyone.

Sincerely,



CHRISTOPHER S. SAVAGE
District Ranger





**Decision Notice
and
Finding of No Significant Impact
for
Petersburg Outfitter and Guide Management Plan
Environmental Assessment**

**USDA Forest Service
Petersburg Ranger District, Tongass National Forest
Petersburg, Alaska**

This Decision Notice contains a brief summary of the environmental analysis completed for the Petersburg Outfitter and Guide Management Plan, as well as, my decision regarding which alternative to implement and the rationale for my decision. It also contains certain Findings required by various laws and information concerning the right to Administrative Review of this decision. The Environmental Assessment completed for this project is incorporated by reference in this decision document.

This Decision Notice documents my decision concerning the Environmental Assessment (EA) for the Petersburg Outfitter and Guide Management Plan. The EA documents the analysis of two action alternatives that examine the potential impacts of outfitter and guide use on National Forest System (NFS) lands on the Petersburg Ranger District (Figure 1). The EA and a letter indicating a tentative selection of Alternative 2 were sent to interested people on January 7, 2010.

Based on the EA completed for this project, as well as comments received during the two 30-day public reviews of the document, it is my decision to select Alternative 2. The EA is available at the Petersburg Ranger District located in Petersburg, AK, and on the Forest Service website at:

http://www.fs.fed.us/r10/tongass/projects/nepa_project.shtml?project=26239.

Decision and Rationale

It is my decision to allocate use to outfitters and guides based on Alternative 2 (the Selected Alternative) (Table 1). The Selected Alternative best meets the Purpose and Need identified in the EA and Forest Plan objectives and guidelines. Implementing the Selected Alternative will:

- Respond to special use permit applications;
- Allocate appropriate outfitter and guide use on the District while recognizing the special values within the Petersburg Creek-Duncan Salt Chuck, Tebenkof Bay and Kuiu Wilderness areas;
- Manage outfitter and guide use on the District to minimize potential impacts to all resources.

Table 1. Summary of actual use (existing condition) and proposed recreation visitor days (RVDs) available to outfitters and guides in Alternatives 1 and 2. Existing Condition numbers are the average RVDs reported from 2004-2008. RVDs available to outfitters and guides in Alternative 1 (Proposed Action) are proportioned out by season; 10 percent in the spring, 65 percent in the summer, 15 percent in the fall and 10 percent in the winter. RVDs in Alternative 2 are proportioned out by season the same way as Alternative 1 except reduced allocations in the spring and fall in study areas 12A and 14; 7 percent in the spring, 73 percent in the summer, 10 percent in the fall and 10 percent in the winter.

Study Area	Comparison	Recreation Visitor Days				
		Spring (April 1 – May 31)	Summer (June 1 – Aug 30)	Fall (Sept 1 – Oct 31)	Winter (Nov 1 – Mar 31)	Total Annual ¹
1 Mitkof Island	Existing Condition	22	391	16	0	429
	Proposed Action and Alternative 2	1,278	8,308	1,917	1,278	12,781
2 Duncan Canal – West Side	Existing Condition	4	60	2	0	66
	Proposed Action and Alternative 2	112	729	168	112	1,122
4 Duncan Canal – East Side	Existing Condition	0	0	0	0	0
	Proposed Action and Alternative 2	50	324	75	50	499
5 Wrangell Narrows/Woewodski Is	Existing Condition	0	27	4	0	31
	Proposed Action and Alternative 2	175	1,136	262	175	1,747
6 Kupreanof Island – North Shore	Existing Condition	6	349 ²	8	0	363
	Proposed Action and Alternative 2	45	291	67	45	448
7 Petersburg Ck/Duncan Salt Chuck	Existing Condition	35	179	14	0	228
	Proposed Action and Alternative 2	126	821	189	126	1,263
8 North Lindenberg Peninsula	Existing Condition	11	151	37	8	207
	Proposed Action and Alternative 2	137	892	206	137	1,373

¹Totals may vary due to rounding.

²This number is higher than proposed allocation; however, 90 percent of the use is from one outfitter and guide in one recreation place. The recreation place is a camp located on a hardened site and it does not experience many impacts. There is some bear hunting and other use in this study area, but conflict between users has not been reported.

Study Area	Comparison	Recreation Visitor Days				
		Spring (April 1 – May 31)	Summer (June 1 – Aug 30)	Fall (Sept 1 – Oct 31)	Winter (Nov 1 – Mar 31)	Total Annual ¹
9 Central Kupreanof Is/Road System	Existing Condition	0	8	0	0	8
	Proposed Action and Alternative 2	353	2,293	529	353	3,528
10 Southwest Kupreanof Island	Existing Condition	17	365	2	0	384
	Proposed Action and Alternative 2	147	955	220	147	1,469
11 Rowan Bay/Bay of Pillars	Existing Condition	26	89	16	1	132
	Proposed Action and Alternative 2	96	627	145	96	964
12A Saginaw/Security/Washi ngton Bays	Existing Condition	90	308	94	2	494
	Proposed Action	129	839	194	129	1,291
	Alternative 2	90	942	129	129	1,291
12B Kuiu Island Road System	Existing Condition	23	66	72	1	162
	Proposed Action and Alternative 2	213	1,381	319	213	2,125
13 Tebenkof Bay/Kuiu Wilderness	Existing Condition	54	363	7	2	426
	Proposed Action and Alternative 2	289	1,880	434	289	2,893
14 Keku Strait/Port Camden	Existing Condition	45	283	40	3	371
	Proposed Action	156	1,015	234	156	1,562
	Alternative 2	109	1,140	156	156	1,562
15 South Kuiu Island	Existing Condition	7	264	0	1	272
	Proposed Action and Alternative 2	126	816	188	126	1,255
16 Reid/No Name Bays	Existing Condition	6	136	1	0	143
	Proposed Action and Alternative 2	112	728	168	112	1,120
21 Muddy River Area	Existing Condition	0	134	47	31	212
	Proposed Action and Alternative 2	129	841	194	129	1,294

¹Totals may vary due to rounding.

Study Area	Comparison	Recreation Visitor Days				
		Spring (April 1 – May 31)	Summer (June 1 – Aug 30)	Fall (Sept 1 – Oct 31)	Winter (Nov 1 – Mar 31)	Total Annual ¹
22 Thomas Bay/Point Vandeput	Existing Condition	13	239	13	17	282
	Proposed Action and Alternative 2	126	820	189	126	1,261
23 Farragut Bay/Cape Fanshaw	Existing Condition	1	30	1	0	32
	Proposed Action and Alternative 2	120	780	180	120	1,200
24 Baird/Patterson Glaciers	Existing Condition	1	8	6	0	15
	Proposed Action and Alternative 2	41	265	61	41	407

¹Totals may vary due to rounding.

Public Involvement

The Petersburg Outfitter and Guide Management Plan EA has been listed quarterly on the Schedule of Proposed Activities (SOPA) since April 2008. At that time, it was proposed jointly with the Wrangell Ranger District portion of the 1997 Stikine Area Outfitter and Guide EA. On May 5, 2008, the Petersburg Ranger District hosted an open house at the District office. A second open house was held in Kake on July 8, 2008. Draft study area maps were posted for viewing at both locations.

In June 2008, the Wrangell Ranger District (WRD) attended a Wrangell Cooperative Association meeting to consult with the tribe, and presented letters inviting consultation on the project. In July 2008, approximately 360 scoping letters were mailed requesting comments on the Proposed Action. Based on public comment, it was determined that each ranger district would complete separate environmental documents and decisions related to outfitter and guide use.

An EA and letter indicating a tentative selection of Alternative 2 was sent to approximately 100 interested people on January 7, 2010. On the same day, a News Release was sent to Alaska media outlets. The 30-day comment period on the EA began January 7, 2010, with the publication of the Notice of Availability in the *Petersburg Pilot*. Due to requests from the public for additional time to review, a second 30-day comment period was initiated on February 11, 2010, with a second Notice of Availability published in the *Petersburg Pilot*. The comment period ended on March 15, 2010.

The Petersburg Ranger District (PRD) received 11 letters/emails/phone calls from eight respondents during the two 30-day comment periods. Excerpts from these communications, followed by responses from the PRD, are located in Appendix A of this Decision Notice. Comments included concerns about high actual use levels in Study Area 6, questions about how additional review of commercial use in an area is triggered and ROS class designations,

concerns about jet boat use and its impacts on Petersburg Creek, and concerns from black bear hunting guides about the validity of recreation place locations and the number of recreation visitor days (RVDs) available to outfitters and guides.

Issues

Two key issues were addressed in the EA: provide stable business opportunities for the outfitter and guide industry, and address conflicts within the outfitter and guide industry.

Alternatives Considered

In making my decision, I also considered Alternative 1 (Proposed Action). A comparison of these alternatives can be found in the EA, pages 2-14 through 2-18 (Tables 2.3 and 2.4).

Alternative 1 – Proposed Action

In this alternative the District proposes to allocate outfitter and guides up to 10 percent of the capacity within an identified home range and 25 percent outside an identified home range. These allocations are proportioned out by season; 10 percent in the spring, 65 percent in the summer, 15 percent in the fall and 10 percent in the winter (Table 1). Allocation by season puts greater limitations on commercial use in the spring and fall, aims to reduce user conflicts by providing more opportunities for solitude and helps indirectly manage outfitter and guide recreation use by activity (i.e., spring and fall outfitter and guide use is mostly for guided black bear hunting).

The proposal would authorize up to approximately 39,600 RVDs across the District for use by outfitters and guides (3,960 RVDs in the spring, 25,741 RVDs in the summer, 5,939 RVDs in the fall and 3,960 RVDs in the winter). The use authorized may be temporary in nature (less than one year) or could be for multiple years. For those operators who have demonstrated satisfactory performance, the District Ranger may issue priority use permits, for a period of up to 10 years, in accordance with FSH 2709.11 (EA, Chapter 2, pp. 1-2).

Alternative 2 – Increased Solitude

This alternative provides a greater opportunity for recreation experiences with solitude in two study areas that have had reported user conflicts. In particular, it is designed to limit conflict among black bear hunting guides and between black bear hunting guides and fishing guides in the spring and fall.

RVD allocation is the same as Alternative 1, except that Study Areas 12A (Saginaw/Security/Washington Bays) and 14 (Keku Strait/Port Camden) have a smaller percentage of use allocated to the spring (7 percent) and fall (10 percent) seasons (Table 1). As a result, outfitters and guides use is more restricted in these two study areas in the spring and fall (EA, Chapter 2, pp. 4-5).

Findings Required by Other Laws and Regulations

2008 Tongass Land and Resource Management Plan Amendment

This decision to implement the Selected Alternative is consistent with the intent of the 2008 Forest Plan Amendment's long-term goals and objectives. The project was designed in conformance with land and resource management plan standards and incorporates appropriate land and resource management plan guidelines.

ANILCA Section 810, Subsistence Evaluation and Finding

The effects of this project have been evaluated to determine potential effects on subsistence opportunities and resources. There is no documented or reported subsistence use that would be restricted as a result of this decision. For this reason, none of the alternatives would result in a significant possibility of a significant restriction of subsistence use of wildlife, fish, or other foods. This finding completes the Section 810 requirements, i.e., no public subsistence hearings are required (FSH 2090.23, Chapter 10).

Coastal Zone Management Act of 1972 (as amended) and the Alaska Coastal Zone Management Program (ACMP)

Under the Coastal Zone Management Act (CZMA) of 1972, activities conducted by the Forest Service that affect the coastal zone must be consistent, to the maximum extent practicable, with the enforceable policies of the Alaska Coastal Management Program (ACMP). In addition, activities affecting the coastal zone that are conducted by non-federal parties under a Forest Service permit must also be consistent with the ACMP. The types of Forest Service permits that the State of Alaska and the Forest Service have agreed are likely to affect the coastal zone—and therefore require ACMP consistency review of the permit applicant's proposal—are listed in section 302 of the Memorandum of Understanding (MOU) between the State and the Forest Service on CZMA/ACMP consistency reviews. The types of special use permits that will be authorized for issuance by this decision are not among those listed in the MOU as requiring ACMP review.

Endangered Species Act of 1973

Biological Evaluations have been completed for this action, which indicate that no federally listed threatened or endangered species will be affected by this activity.

National Historic Preservation Act of 1966

The Forest Service program for compliance with the National Historic Preservation Act (NHPA) includes locating, inventorying and evaluating the National Register of Historic Places eligibility of historic and archeological sites that may be directly or indirectly affected by scheduled activities. Regulations (36 CFR 800) implementing Section 106 of the NHPA require Federal agencies to consider the effects of their actions on sites that are determined eligible for inclusion in or are listed in the National Register of Historic Places (termed "historic properties"). The Alaska Region of the USDA Forest Service, the Alaska State Historic Preservation Officer, and the Advisory Council on Historic Preservation have established streamlined Section 106 review guidelines and stipulations in a Programmatic Agreement (USDA 2002).

Outfitter and guide use is not expected to result in the discovery or disturbance of human remains. However, if human remains are discovered, they will fall under the inadvertent discovery provisions of the Native American Graves Protection and Repatriation Act (NAGPRA).

Outfitter and guide use is also not expected to restrict Alaska Native access to traditional religious or spiritual sites that are protected under the American Indian Religious Freedom Act (AIRFA) and Forest Service standards and guidelines for the treatment of sacred sites (USDA 2008, p. 4-19).

A Forest Service archeologist has reviewed this project and made a determination of No Historic Properties Affected in the area of potential effect for the proposed project. Obligations using modified procedures of the 36 CFR 800 review process, as defined in the Programmatic Agreement, have been met.

Floodplain Management (Executive Order 11988)

No outfitter and guide permits will be issued that allow permanent development in floodplains within the Petersburg Ranger District. It is expected that none of the outfitter and guide activities will affect velocity or location of flows or width and depth of water. Therefore, no measurable short or long-term effects for floodplains are anticipated under any alternative.

Protection of Wetlands (Executive Order 11990)

No outfitter or guide activities that result in long-term impacts (filling, dredging, etc.) to wetlands will be permitted under this document (USDA Forest Service Manual 2527.01-04).

Recreational Fisheries (Executive Order 12962)

Federal agencies are required, to the extent permitted by law and where practicable, and in cooperation with States and Tribes, to improve the quantity, function, sustainable productivity, and distribution of U.S. aquatic resources for increased recreational fishing opportunities. As required by this Order, I have evaluated the effects of this action on aquatic systems and recreational fisheries and documented those effects relative to the purpose of this order. Since there are no effects to fisheries resources within the project area, there will be no direct, indirect or cumulative impacts related to this Order.

Environmental Justice/Civil Rights (Executive Order 12898)

I have determined that in accordance with Executive Order 12898 this project does not have disproportionately high and adverse human health or environmental effects on minority populations and low-income populations.

Magnuson-Stevens Fishery Conservation Act of 1996

Essential Fish Habitat (EFH) is the water and substrate necessary for fish spawning, breeding, feeding, or growth to maturity. The marine EFH in Alaska includes estuarine and marine areas from tidally submerged habitat to the 200-mile exclusive economic zone (EEZ). The freshwater EFH includes streams, rivers, lakes, ponds, wetlands, and other bodies of water currently and historically accessible to salmon. EFH for Pacific salmon recognizes six critical life history stages: (1) spawning and incubation of eggs, (2) juvenile rearing, (3) winter and summer rearing during freshwater residency, (4) juvenile migration between freshwater and estuarine rearing habitats, (5) marine residency of immature and maturing adults, and (6) adult spawning migration. Habitat requirements within these periods can differ significantly and any modification of the habitat within these periods can adversely affect EFH.

Section 305(b)(2) of the Magnuson-Stevens Fishery Conservation and Management Act states that all federal agencies must consult the National Marine Fisheries Service (NMFS) for actions or proposed actions that may adversely affect Essential Fish Habitat. The Act promotes the protection of EFH through review, assessment, and mitigation of activities that

may adversely affect these habitats. On August 25, 2000, the Forest Service, Alaska Region, and NMFS came to an agreement on how consultation will be accomplished in Alaska.

The Petersburg Outfitter and Guide Management Plan EA satisfies the consultation requirements. It provides a description and assessment of EFH in the project area, a description of the Petersburg Outfitter and Guide Management Plan and its potential impacts on these habitats, and a description of the mitigation measures that would be implemented to protect these habitats.

The analysis area provides a large amount of EFH and includes all of the freshwaters on the Petersburg Ranger District. Since Marine Access Facilities would only have occasional use and solely for the purposes of road system access, there would be no anticipated effect to marine resources and therefore are not analyzed further as part of this assessment.

This decision will authorize a variety of outfitted and guided activities around the Petersburg Ranger District. The Aquatic Resources section of the EA specifically examines the effects of outfitted and guided sport fishing, which is the primary activity that would affect EFH, on the aquatic resources around the District.

The Forest Service believes that the Petersburg Outfitter and Guide Management Plan EA may adversely affect EFH. However, the effects, as described in the EA, will be minimal or virtually immeasurable. By implementing Forest Plan Standards and Guidelines, Best Management Practices, and Outfitter and Guide permit stipulations, effects to EFH should not occur. Additional impacts to EFH may occur only from unforeseen events.

National Forest Management Act

All project alternatives fully comply with the Forest Plan. This project incorporates all applicable Forest Plan Standards and Guidelines and management area prescriptions as they apply to the project area, and complies with Forest Plan goals and objectives. All required interagency review and coordination has been accomplished; new or revised measures resulting from this review have been incorporated.

The Forest Plan complies with all resource integration and management requirements of 36 CFR 219 (219.14 through 219.27). Application of Forest Plan direction for the Petersburg Outfitter and Guide Management Plan ensures compliance at the project level.

Bald and Golden Eagle Protection Act

This law provides for the protection of the bald eagle and the golden eagle by prohibiting, except under certain specified conditions, the taking, possession and commerce of such birds. Bald eagle habitat will be managed in accordance with the Interagency Agreement established with U.S. Fish and Wildlife Service to maintain habitat to support the long-term nesting, perching, and winter roosting habitat capability.

Bald eagle nests are protected under agreement with the U.S. Fish and Wildlife Service. Currently, a 330-foot radius protective habitat management zone surrounds all identified bald eagle nest trees (USDI 2002) and a 1,000 foot beach buffer is maintained along the shoreline (USDA 2008, p. 3-239). Activities of outfitters and guides in all alternatives will be restricted away from nest trees through the permitting process.

Federal Cave Resource Protection Act

No known significant caves in the project area will be directly or indirectly affected by project activities. Forest Plan Karst and Caves Standards and Guidelines are applied to areas known or suspected to contain karst resources.

Clean Water Act

This decision does not authorize any ground disturbance, or use of or discharge of potential pollutants. Implementation will not result in non-point or point sources of pollution; therefore, the project is fully compliant with the Clean Water Act.

Clean Air Act

Minimal emissions are anticipated from the implementation of either project alternative; therefore, the State of Alaska ambient air quality standards (18 AAC 50) will not be exceeded.

Executive Order 11593

Executive Order 11593 directs federal agencies to provide leadership in preserving, restoring and maintaining the historic and cultural environment of the Nation. The work accomplished in accordance with Section 106 of the National Historic Preservation Act for the Petersburg Outfitter and Guide Management Plan meets the intent of this Executive Order.

Executive Order 12962

With the application of Forest Plan Standards and Guidelines, including those for riparian areas, no significant adverse effects to freshwater or marine resources will occur.

Effects on Prime Farm Land, Range Land, and Forest Land

No prime farm land or range land exists in the project area. Forest land will maintain its productivity.

Threatened, Endangered and Sensitive Species (TES)

A biological evaluation was completed for TES plants. A biological evaluation/assessment was completed for TES vertebrates. Consultation with the U.S. Fish and Wildlife Service and National Marine Fisheries Service to review the effects of this project on threatened, endangered, and proposed species is not required. ESA does not require consultation for “no effect” determinations. Standards and guidelines have been applied as needed to ensure that any listed threatened or endangered species or its habitat will not be adversely affected. The Forest Plan contains standards and guidelines for each designated sensitive species, and these are incorporated into the project as applicable.

Wild and Scenic Rivers Act

No alternative will affect rivers eligible for Wild and Scenic River designation.

Federal and State Permits, Licenses, and Certifications

No permits, licenses, or certifications were required for this project.

Finding of No Significant Impact

I have reviewed the Environmental Assessment for this project using criteria identified in implementing regulations for the National Environmental Policy Act (40 CFR 1508.27). Based on the Environmental Assessment and the findings displayed above, I have determined that this is not a major action that will have a significant effect on the human environment and therefore does not require the preparation of an Environmental Impact Statement. I base my finding on the following:

1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.

Chapter 3 of the EA describes effects that are both beneficial and adverse. Regardless of the beneficial effects, no adverse effects were identified that would cross the threshold of NEPA significance or otherwise warrant the preparation of an EIS for this project.

2) The degree to which the proposed action affects public health or safety.

This action does not pose a substantial question of significant effect upon public health or safety. Similar past forest management activities (allocation of commercial and non-commercial use on the NFS lands for the project area) have not resulted in significant effects upon public health or safety. All applicable Federal and State laws pertaining to public health and safety would be followed.

3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

There are no known significant effects to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, wilderness, or ecologically critical areas (EA, Chapter 3).

4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.

The effects on the quality of the human environment are not likely to be highly controversial.

5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

There are no known effects on the human environment that are highly uncertain or involve unique or unknown risks. The mitigations and other features of this decision are either commonly used and/or present known risks (EA, Chapter 2, pp. 5-11 and Table 2.2, pp. 7-8).

6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The proposed action does not set a precedent for any future actions with significant effects nor does it represent a decision in principle about a future consideration. This decision only pertains to potential impacts of outfitter and guide use on NFS lands for the Petersburg Ranger District. Proposals for development received through the application process for special uses are not addressed with this decision document. Development proposals, authorized under different Forest Service authorities, are beyond the scope of this analysis

(EA, Chapter 1, p. 2). Any future decisions will need to consider relevant scientific and site-specific information available at that time.

7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

There are no known significant cumulative effects resulting from this project and other projects implemented or planned in the areas surrounding the project area. Cumulative effects were analyzed and disclosed in Chapter 3 of the EA. The project record contains the detailed analyses of individual resources supporting this judgment.

8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

This action would not cause the loss or destruction of significant scientific, cultural, or historical resources. There are no known cultural resource sites that would be affected by this project. We have determined that no known historic properties will be affected by project implementation (EA, Chapter 3, pp. 9-11).

9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

No threatened, endangered, or sensitive species or their critical habitats are affected by this decision. The project record contains the Biological Evaluations supporting this judgment (EA, Chapter 3, pp. 7-9 and 30-34; Appendix C).

10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

This action does not violate Federal, State, or local law requirements imposed for the protection of the environment, and has been reviewed by Federal and State agencies (EA, Chapter 1, pp. 10-11). There are no known significant effects on civil rights, women or minorities (EA, Chapter 3, p. 38).

Implementation Date

This decision made by the Petersburg District Ranger is subject to appeal pursuant to 36 CFR Part 215. If no appeals are filed within the 45-day time period, implementation of the decision may begin on, but not before, the fifth business day following the close of the appeal-filing period (36 CFR 215.15).

Right to Appeal or Administrative Review

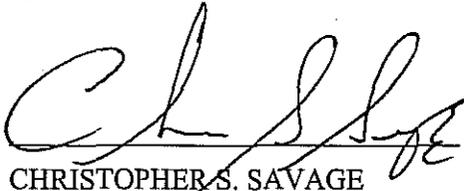
This decision is subject to administrative review (appeal) pursuant to 36 CFR Part 215. Individuals or non-federal organizations who submitted written comments or otherwise expressed interest in this particular action during the comment period have standing to appeal this decision (36 CFR 215.6). The notice of appeal must be in writing, and meet the appeal content requirements at 36 CFR 215.14. The appeal must be filed (regular mail, fax, email, hand-delivery, or express delivery) with the Appeal Deciding Officer:

Forrest Cole
Forest Supervisor USDA Forest Service
Tongass National Forest
Federal Building 648 Mission Street
Ketchikan, AK 99901
Fax: 907-228-6125

The office business hours for those submitting hand-delivered appeals are: 8:00 am to 4:30 pm Monday through Friday, excluding holidays. Electronic appeals must be submitted to appeals-alaska-tongass@fs.fed.us. In cases where no identifiable name is attached to an electronic message, a verification of identity will be required. A scanned signature is one way to provide verification.

Appeals, including attachments, must be filed within 45 days from the publication date of the legal notice of this decision in the Petersburg Pilot, the newspaper of record. Attachments received after the 45-day appeal period will not be considered. The publication date in the Petersburg Pilot is the exclusive means for calculating the time to file an appeal. Those wishing to appeal this decision should not rely upon dates or timeframe information provided by any other source.

For additional information, contact Christopher S. Savage, District Ranger, or Russell Beers, Special Use Administrator, at 907- 772-3871.



CHRISTOPHER S. SAVAGE

District Ranger

5/27/10
Date

References

- USDA Forest Service. 2002. *Second Amended Programmatic Agreement among the USDA Forest Service, Alaska Region, the Advisory Council on Historic Preservation, and the Alaska State Historic Preservation Officer regarding the Heritage Resource Management of National Forests in the State of Alaska*. Agreement # 02MU-111001-076. Manuscript on file, USDA Forest Service, Tongass National Forest, Petersburg Supervisor's Office, Petersburg, AK.
- USDA Forest Service. 2008. *Tongass Land and Resource Management Plan*. Tongass National Forest. R10-MB-603b. USDA Forest Service, Alaska Region, Juneau.
- USDI Fish and Wildlife Service. 2002. *Memorandum of Understanding between the USDA Forest Service, Alaska Region and the USDI Fish and Wildlife Service, Alaska Region*. 6 pp.



Duncan Salt Chuck Creek, Kupreanof Island. Photograph by Heath Whitacre.



Forest Service road in the Kadake watershed on Kuiu Island. Photograph by Heath Whitacre.

Appendix A

Petersburg Outfitter and Guide Management Plan EA Response to Comments

The Petersburg Ranger District (PRD) received 11 letters/emails/phone calls from eight respondents during two 30-day comment periods for the Petersburg Outfitter and Guide Management Plan EA. Excerpts from these communications, followed by responses from the PRD, are below. Two of the responses we received (Kyle Smith, Alaska Department of Natural Resources and Susan Magee, State of Alaska) did not require a response.

Complete records of all comments are located in the project record and are available upon request.

Note: Unless a comment was submitted by phone, they appear as they were submitted in their respective letter or email.

Alaska Professional Hunter's Association

Comments from email submitted on February 4, 2010

APHA 1: *On behalf of the Alaska Professional Hunters Association (APHA), we request that the comment period for the Petersburg Outfitter and Guide Management Plan Environmental Assessment be extended until March 8.*

Response: Petersburg Ranger District ran a second 30-day comment period that ended on March 15, 2010, to provide the public more time to comment.

Joel Hanson (The Boat Company)

Comments from phone conversation with Marina Whitacre, project team leader, on February 5, 2010

JH 1: *I am concerned that Study Area 6 is above capacity at this time. This is an area I would like to use. Why isn't there an effort to reduce use in Study Area 6?*

Response: There has been a decline in use in Study Area 6, which is expected to continue. 2006 was an exception when actual use exceeded suggested allocated use (Table 3.2, p. 3-19 of the EA). Approximately 90 percent of the use in Study Area 6 is from one outfitter and guide in one recreation place. Use is concentrated at a campsite during the summer, and occupation is sporadic with low impacts since the camp is on a hardened site. Based on these factors, the amount of use hasn't been a concern for the Ranger, who is open to allowing additional use in other recreation places within the study area. This scenario is a good example of how the Petersburg Outfitter and Guide Management Plan is simply a *guide* for determining allocated use. The Ranger ultimately has the responsibility of assessing each situation, with the EA as a guide, to determine whether or not more use is available.

JH 2: *In the EA on pages 1-5 to 1-6 under Decision Framework it is stated, "In order to maintain a quality recreation experience and a balance between guided and unguided use, the District Ranger will also decide what level of guided use will trigger additional review by*

study area.” What is the framework used by the Ranger to determine if additional review is needed? This is unclear.

Response: If we are at capacity and receive a request for additional use there will be several factors to consider:

- 1) At present, what type of use (guided and unguided) is in the area?
- 2) What type of new use is being proposed?
- 3) What is the conflict potential if a new outfitter/guide is allocated user days?
- 4) If there are potential conflicts, are they anticipated to be between guided and unguided users, or between guided users?
- 5) Do any of the District’s resource specialists have resource concerns regarding increased use in the area?

The Ranger relies heavily on feedback from the current guided (or although more difficult to come by - unguided) users to get a sense of whether or not the area can handle more use. The Ranger also receives information from the District’s recreation crew who monitor use at recreation sites.

It is important to note that our final capacity calculations are guidelines only. If it is decided that an area cannot handle more guided use, we will go to a prospectus where users compete for user days.

JH 3: Along the shoreline of the Tebenkof Wilderness, the ROS class is Primitive. How can this be an accurate classification since there is a trolling fleet that anchors up at Table Bay? What are the factors that differentiate a Primitive and Semi-primitive ROS class?

Response: Your point is well-taken. There is often a trolling fleet working in lower Chatham; however, the Forest Service does not have jurisdiction over the activities that take place offshore, even if they impact user-experience onshore.

Relative to most of the Tongass, southwest Kuiu Island has very low levels of use or development on the uplands and low levels of motorized use offshore. This is true for the wilderness in Tebenkof Bay, as well in the non-wilderness at Table Bay. As directed in the Tongass National Forest Land and Resource Management Plan (p. 3-18), the standard for Recreation Use Administration is to emphasize wilderness and to manage for a Primitive Recreation Opportunity Spectrum (ROS) setting. The Primitive ROS helps to emphasize primitive recreation on a sustained basis and to protect the wilderness character.

ROS classifications are determined by land-based management designations, specifically Land Use Designations (LUDs), where a defined area of land specific to a management direction is applied. The LUDs on the south end of Kuiu include Wilderness and Semi-remote Recreation. There are also seven elements considered in the determination of recreation settings (scenic quality, access, remoteness, visitor management, on-site recreation development, social encounters and visitor impacts) (Forest Plan FEIS pp 3-368 to 3-369, Table 13.5-2) (see the next two pages).

3 Environment and Effects

**Table 3.15-2
Comparison of ROS Classes**

	Urban (U)	Rural (R)	Roaded Modified (RM)	Roaded Natural (RN)
Scenic Quality	Alterations to landform and vegetation dominate landscape; nonrecreational activities not to exceed Low SIO - FG; Very Low SIO - MG.	Alterations to landform and vegetation dominate landscape; nonrecreational activities not to exceed Low SIO - FG; Very Low SIO - MG.	Alterations dominate the landscape; nonrecreational activities/structures evident, but do not exceed Very Low SIO.	Alterations to landscape subordinate; nonrecreational activities not to exceed Low SIO though typically Moderate SIO.
Access¹	Access and travel facilities are highly intense, motorized, and often with mass transit supplements.	All methods of access and travel may occur, but subject to formal regulation.	All methods of access and travel when needed and compatible with intended activities.	All methods of access and travel may occur when compatible with intended activities; zones of non-motorized use.
Remoteness	Remoteness from sites and sounds of human activity not available or important.	Remoteness from sites and sounds of human activity not available or important.	Remoteness from continuous sounds of human activity is expected.	Remoteness from continuous sounds of human activity is of moderate importance.
Visitor Management	Intensive on-site controls are numerous and obvious.	On-site regimentation and control is obvious.	On-site regimentation and controls are few.	On-site regimentation and control is obvious.
On-site Recreation Development	Recreation structures and facilities readily evident, but appropriate for setting; designed for high use levels. Information and interpretive facilities may be large and complex.	Recreation structures and facilities readily evident, but appropriate for setting, designed for high use levels. Information and interpretive facilities may be large and complex.	Recreation structures and facilities may be present, but are provided primarily for protection of the resource rather than user convenience. Facilities are rustic and harmonize with a backcountry setting.	Recreation structures and facilities provided for site protection and user convenience. Facilities are contemporary but of rustic design and harmonize with natural setting.
Social Encounters	High concentrations of people at one time.	Moderate to high concentrations of people at one time.	Moderate concentration of users on roads and little evidence of others or interactions at campsites.	Interactions with others may be moderate to high. Moderate concentrations of people, especially on trails and in dispersed areas.
Visitor Impacts	Very noticeable, but managed to prevent physical resource degradation.	Very noticeable, but managed to prevent physical resource degradation.	Human use noticeable, but not degrading to resources. Site hardening dominates campsites, parking areas.	Visitor use noticeable, but not degrading to resources; established SIOs.

**Table 3.15-2 (continued)
Comparison of ROS Classes**

	Semi-Primitive Motorized (SPM)	Semi-Primitive Non-Motorized (SPNM)	Primitive (P)
Scenic Quality	Alterations few and subordinate to landscape; designed and located to not exceed Moderate SIO.	Alterations few and subordinate to landscape; nonrecreational activities and structures designed not to exceed High SIO.	Alterations to landscape not evident; structures do not exceed High SIO.
Access¹	Travel on trails designed for/open to motor vehicles; roads maintained for high clearance vehicles; motorboats operating on waterways; may establish zones of non-motor use for facility/resource protection.	Trails closed to motorized use; nonmotorized boats used on freshwater lakes and streams.	Trails closed to motorized use; non-motorized boats used on freshwater lakes and streams.
Remoteness	Nearby sights and sounds of human activity are rare; distant sounds may occur.	Nearby sounds of human activity are rare; distant sounds may occur.	Sounds of human activity are very infrequent to nonexistent.
Visitor Management	On-site regimentation and controls are few.	On-site regimentation and controls are rare.	On-site regimentation and controls are very rare.
On-site Recreation Development	Recreation structures and facilities may be present, provided primarily for protection of site rather than user convenience. Facilities, when present, are rustic and harmonize with natural setting.	Recreation structures and facilities may be present but provided primarily for protection of site. Facilities, when present, are rustic and harmonize with natural setting.	Recreation structures are rarely present, provided primarily for the protection of the site. Facilities, when present, are rustic and harmonize with natural setting.
Social Encounters	Low interaction between users. Campsites seldom within sight or sound of another group except during peak periods.	Low interaction between users. Campsites seldom within sight or sound of another group except during peak periods.	Very low interaction between users and no other groups in sight or sound of overnight camps.
Visitor Impacts	Human use noticeable, but not degrading to resource or backcountry setting.	Human use noticeable, but not degrading to resource elements.	Human use essentially unnoticeable. Site hardening—boardwalks, boat moorings, food caches.

¹ Subject to ANILCA provisions.

Note: SIO = Scenic Integrity Objective, FG = Foreground, MG = Middleground

Source: USDA Forest Service 1997a (Table 3-30).

Mike Stainbrook

Comments from phone conversation with Marina Whitacre, project team leader, on February 19, 2010

MS 1: *As a property owner along Petersburg Creek, I am concerned about the negative effects of jet boats on the Creek's steelhead redds. I suggest Forest Service signage to inform jet boat users of its impacts on the Creek and to possibly restrict use during critical time periods for the redds. Maintaining good habitat in Petersburg Creek for steelhead is very important to me.*

Response: Most of the activity up Petersburg Creek is local, unguided use. The appropriate place for site specific restrictions on outfitter and guide use is within their special use permits. Since there is not a permitting process for unguided users, the District has no direct authority on their use. Also see responses MS 3 and MS 4.

Comments from phone conversation with Marina Whitacre, project team leader, on February 22, 2010

MS 2: *Is there any way of knowing the number of people using Petersburg Creek?*

Response: District aquatics and recreation personnel are developing a proposal to monitor use on Petersburg Creek. The District is interested in quantifying use by watercraft (kayak, jet boat and outboard) and establishing a baseline for subsequent monitoring.

Comments from email/letter submitted on February 28, 2010

MS 3: *I support the Petersburg Ranger District proposal to allocate no more than 10% of the capacity for outfitter guide usage. I also agree with the proposed mitigation for boat usage by outfitters and guides to not be permitted above the log jam (Chapter 2, page 8, Table 2.2). I also feel this should be extended to all users of motorized boats.*

Response: For the general public, passage beyond the log jam is discouraged. However, access shall not be facilitated by use of a chainsaw (chainsaw use is illegal in Wilderness). The District is interested in pursuing closure above the log jam to all jet boat users and has had conversations with the State and the Alaska Board of Fisheries in regards to jet boat impacts on fish habitat. Our intention is to continue these discussions.

MS 4: *The concerns of noise in the wilderness and impact of boat wakes on stream banks, from motorized boats, are also my concerns.*

Response: Noise from motorized boats is addressed in the EA in Chapter 2, p. 8. Outfitters and guides on Petersburg Creek are encouraged to minimize motorized boat use above the high tide trailhead and are not permitted above the log jam (1.8 miles upstream from the Wilderness boundary).

A sound monitoring program is now being tested in the Misty Fjords National Monument Wilderness to help managers and the public understand current audio conditions there and how those conditions are changing over time. If this program proves to be successful and economical, it may be implemented on Petersburg Creek to establish a baseline.

The District recognizes the need to quantify the effects of increasing jet boat use on Petersburg Creek. An additional element of the study mentioned in response MS 2 is to complete stream bank surveys to monitor and mitigate accelerated erosion. The District is

also interested in monitoring steelhead habitat and turbidity in Petersburg Creek to better understand the impacts of current and increased use levels.

MS 5: There are other concerns that additionally need to be addressed and mitigated and these include:

1) Safety issues – between motor boats (especially jet boats) and kayakers and in stream fishermen.

2) Turbidity issues as a result of jet boats in low water conditions on spawning fish and streambed spawning habitat.

Response: Yes, safety of all users is a concern, but it is not an issue addressed at the programmatic document level. For outfitters and guides that use the Creek, general safety expectations are stated in the permit. PRD aquatics specialists are interested in collecting turbidity data in Petersburg Creek. Also see response MS 4.

MS 6: I would strongly suggest including language for non-paid guide usage on weekends and Federal and State Holidays in recognition of the increased use by Petersburg Residents at these times.

Response: There are weekend and holiday closures on guided fishing at three popular recreation areas on the District – Kah Sheets, Kadake and Castle creeks. Guided use up Petersburg Creek is currently so low that a weekend and holiday closure would not create a noticeable decrease on the amount of use during these times.

MS 7: Systematic, across time, scientific data needs to be collected on recreational use of the creek (both guided and non-guided). It is important to establish valid figures of how the creek is used.

Response: See response MS 2.

MS 8: There seems to be an increased number of trips in this area that may well increase both because of demand from the lower 48 and the economy of Southeast Alaska moving people into guiding. It is important to monitor guiding activity annually and have the ability to make timely adjustments to adequately protect the land resources and the recreational experience for all users.

Response: The monitoring mentioned in responses MS 2 and MS 4 will help the District understand the trend of use and its impacts on Petersburg Creek. Additional information is collected annually from outfitters and guides who are required to report their client numbers, dates of use, activities, locations used and time spent on the National Forest. From these use reports, authorized use levels can be adjusted from year to year, if necessary. At a broader level, the Carrying Capacity Report and Outfitter and Guide Management Plan are updated periodically to account for the growth of the outfitter and guide industry and policy changes in the Agency. To read more about the history of the project see Chapter 1, pp. 2-4 of the EA.

Brad Dennison (Alaska Coastal Outfitters)

Comments from phone conversation with Marina Whitacre, project team leader, on January 28, 2010

BD 1: *I expected the scoping comments to be published and responded to in the EA.*

Response: The scoping comments were discussed and addressed in a team meeting, but it was never intended for them to be published. Comments on an EA are sometimes published in the DN/FONSI, but it is not required by Forest Service or Council on Environmental regulations. It is a decision left up to the Ranger. All comments received during the life of the project are filed in the project record and are available upon request.

BD 2: *I, along with other hunters I've talked to, still feel the methodology is "all wrong".*

Response: The District recognizes that there is no one method of calculating recreation use capacity that can capture and address everything. It is, however, a process that is amenable to updating and improving, which has been done twice since its inception. For instance, in the latest revision of the recreation capacity report, the District revised the study area boundaries to group similar recreation uses within a study area. Another change has been to examine use seasonally rather than annually. Both changes help us better manage use in time with more specificity – namely in study areas 12A and 14 during the fall and spring seasons. Reported recreation visitor days (RVDs) associated with day use by all boat-based hunting operations was also revised to account for the sensitivity of these users to encounters with others. To address this, a multiplier of three was factored into the all reported boat-based day-use hunting that occurred on NFS lands to artificially increase actual use and lessen the gap between actual and allocated use. The result is significantly less additional use available during the spring and fall in these areas. The multiplier is reflected in the 5-year (2004-2008) actual use RVD average.

BD 3: *I am concerned because the allowable total RVDs by season are still between 10 and 20 times that of Actual Use (existing condition).*

Response: Yes, this is true when looking at RVDs available District-wide; however, for study areas 12A and 14 (Table 2.3 on p. 2-16 of the EA) where guide use and tensions are highest, available use in spring and fall are very close to actual use. In 12A spring use is at 100 percent of capacity, and fall use is at 73 percent. In Study Area 14 available spring use is at 41 percent of capacity and fall use is at 26 percent. These reduced capacities, coupled with a cap on guided black bear hunts on the PRD (see March 24, 2008 letter from the Tongass Forest Supervisor), do not allow for an increase in guided bear hunts in these areas, regardless of remaining available use. Estimated available use is only intended to be a guideline. See response to BD 5.

BD 4: *I found the following paragraph confusing because it moves back and forth when talking about Kuiu and PRD. I am also not aware of any ongoing discussions between the FS and ADF&G regarding the number of black bear hunts. The terminology for quantifying use is confusing – this paragraph is talking about number of hunts and the EA talks about RVDs. What is the number that "this number" in the second to last paragraph referring to?*

Currently on the Petersburg Ranger District, commercially guided black bear hunts are capped at 188 hunts. The total number of black bear hunts that take place on Kuiu Island (commercial and non-commercial) is an

ongoing discussion between the Forest Service and the State Department of Fish and Game. For the foreseeable future, this number of commercial hunts authorized on Kuiu will not increase. If the demand in hunter use continues to rise, a prospectus will be used to allocate future hunts.

Response: The Petersburg District Ranger and Rich Lowell at ADF&G communicate regularly regarding the number of black bear hunts on the District. Both agencies are concerned about black bear numbers and have been working cooperatively to manage the resource responsibly. Regarding the second to last sentence in the paragraph above, we apologize for the error. It should read, “For the foreseeable future, this number of commercial hunts authorized on the *Petersburg Ranger District* will not increase.”

BD 5: I am concerned about use that's still available and how if more permits are administered, it will negatively affect the current commercial hunting guides. How can the Ranger make a decision to not administer more permits if there are RVDs available – could the FS get sued by an outfitter and guide and then be required to administer a permit? I am worried that if this were to happen my business would be negatively affected.

Response: This Outfitter and Guide Management Plan EA is a programmatic document that provides sideboards on managing outfitter and guide use on the District. The Ranger has the flexibility to work within these sideboards. If an area is showing signs of too much use, or if there are reported conflicts either between guides or between guided and unguided users, the Ranger is responsible for making area-specific management changes or mitigations that address the concern. These changes may include a cap on use regardless of the availability of RVDs as determined by the carrying capacity report and selected alternative.

Comments from email/letter submitted on March 8, 2010

BD 6: The first thing I would like to comment on is that it would be extremely helpful if public input to the development of this plan was more thoroughly discussed in the plan. One [sic] both occasions when public input to the Petersburg Carrying Capacity Report was solicited I went to the effort to provide comments which I felt were important to the development of a meaningful analysis. I can find no mention of the issues I raised in either letter in the EA, other than the general observation that guides think there are user conflicts. The specific concern that I expressed both times about improper methodology, which is my primary concern, is not discussed anywhere in the EA. If my math is correct, based upon the short section in the EA having to do with the January 2009 scoping letter solicitation on page 9 of chapter 1, there were only 2 letters received from existing permit holders actively engaged on the PRD, mine and one other. It seems to me that it would not take an unreasonable amount of effort to discuss those 2 letters and respond to those concerns.

Response: To clarify, the Petersburg Carrying Capacity Report did not go out for public review until it was published as an Appendix in the EA (Appendix A). It is an internal document used to develop alternatives 1 and 2 presented in the EA. You did, however, submit comments to two scoping letters regarding the project and the development of the carrying capacity report. In Chapter 1, on page 8 of the EA, there are 10 bulleted statements listing the comments received on the July 2008 scoping letter. In addition to mentioning conflict between users, suggestions from respondents include authorizing different permitted uses at different times, assigning priority hunts, and going to prospectus. The concerns and feedback received resulted in conversations with some of the commercial bear hunting

operators during the development of this EA. It also resulted in three changes that included a revised proposed action. At this point it was decided to analyze Petersburg and Wrangell Ranger Districts separately since the July 2008 scoping response demonstrated different issues on each District that require different alternatives. For PRD the proposed action was revised to manage outfitter and guide use on a seasonal rather than annual basis. PRD also revised the reported RVDs associated with day use hunting operations as described in response to BD 2.

BD 7: Along that line I would like to request that in the final EA you list the concerns of each respondent to the current comment solicitation and that you address these concerns in the final EA on a point by point basis.

Response: Comments received regarding the EA were discussed by project team members and the Ranger. Responses have been compiled here in Appendix A of the Petersburg Outfitter and Guide Management Plan Decision Notice and FONSI.

BD 8: In many places in the EA you have noted that you have addressed the concern of user conflicts by shifting some of the spring and fall use to the summer season and by allowing some additional visitor day credit for guided hunts. While it is true that you have made those allowances, the implication that you have addressed our concerns in any significant way is entirely misleading. A careful look at your carrying capacity numbers will confirm that.

Response: See response to BD 2. We regret that you think Forest Service efforts are misleading.

BD 9: In the final EA I would very much like to see a careful explanation of the thought process you have used to conclude that slight changes to the spring and fall visitor day balance have adequately addressed the user conflict issue despite a 1,000% increase to the spring commercial pool and a 2,000% increase to the fall commercial pool (ref: Chapter 2, page 18). The notion that the EA effectively addresses the social overcrowding issue during the spring and fall seasons is, for lack of a better word, absurd when considering the numbers in the table.

Response: See response to BD 2. The premise of calculating proposed RVDs by season was to reduce conflict between guided bear hunts in study areas 12A and 14 in the spring and fall. A concerted effort was not made to bring actual commercial use closer to allocated commercial use in the other study areas since the need was not there.

BD 10: Shown as green circles are those areas that can be utilized in the fall by commercial operators (see Figure 2). These are stream corridors that have populations of spawning salmon. The only commercial users in the fall are either bear hunting guides (the vast majority of use) or charter guides (a smaller commercial group, many of which are not properly licensed and permitted). Both groups utilize only those streams with reasonable numbers of spawning salmon. Many of the streams in Study Area 14 are devoid of salmon....At most, the usable area available to commercial guides each fall is 636 + 327 acres, or 963 acres. Because of the width of the stream corridor that I used this is probably about twice the actual area that can be effectively utilized. Even using the wider corridor, the actual usable area is only 9.6% of the area assumed in the model. An error of that size can not [sic] be "tweaked" into reality by making slight adjustments.

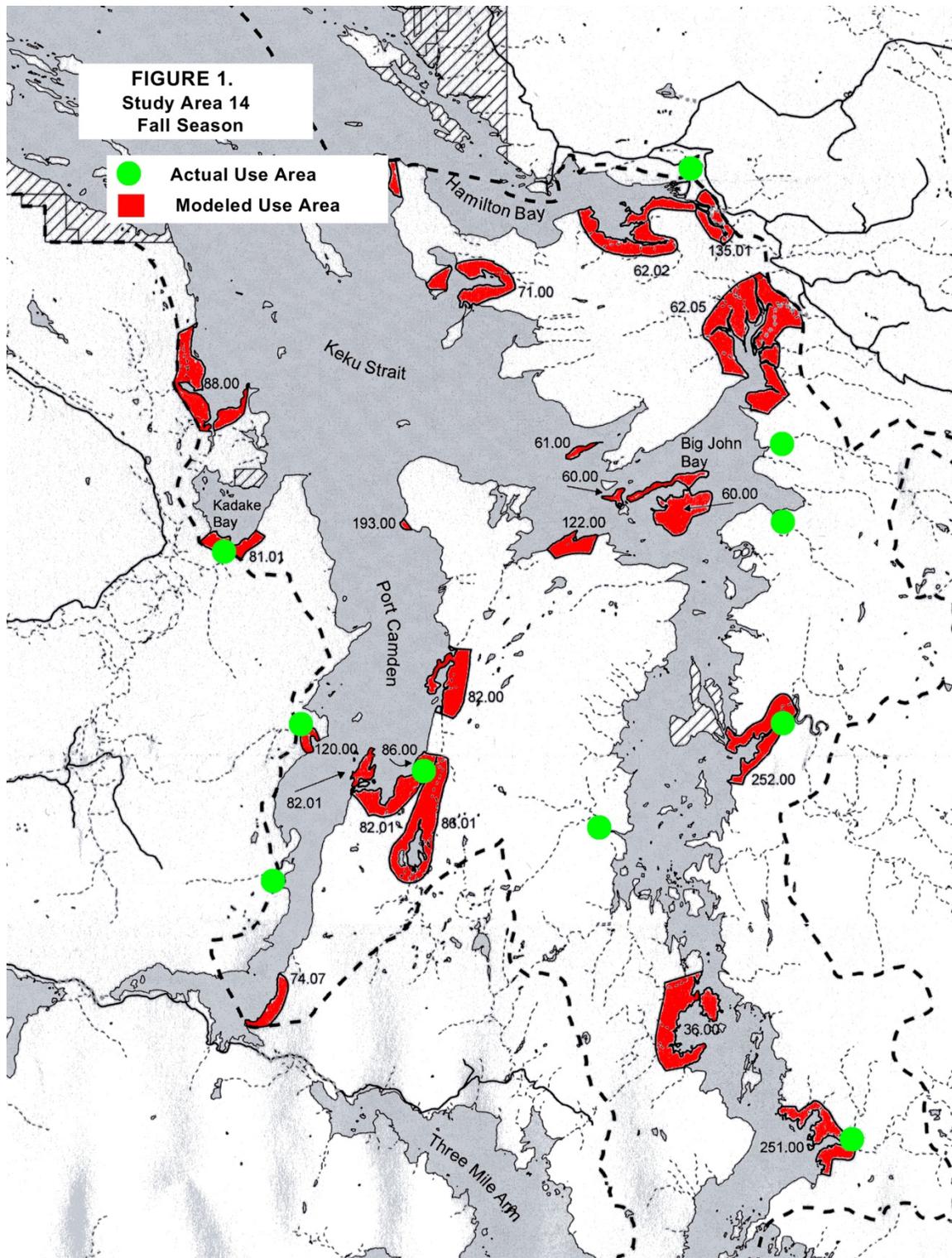


Figure 2. Map provided by Brad Dennison in his March 8, 2010, comment letter on the Petersburg Outfitter and Guide Management Plan EA.

Response: We appreciate the time you put into comparing the District's designated recreation places with those areas used by fall commercial operators. You have provided use locations of which we were not previously aware. We would like to reiterate that the recreation places designated by the District also consider non-commercial users, as well as commercial users other than bear hunting and fishing services. We feel that we have minimized the amount of "excess use" available in the fall and spring in study areas 12A and 14 by allocating use by season.

During the current analysis we have taken time to review recreation places and their boundaries; they are not static. In our latest analysis recreation place boundaries changed due to land status changes, a re-evaluation of recreation attractors, new information and the most recent use data. As a result there are 70,976 fewer recreation place acres today than in 2004. Also see responses to BD 2, BD 3, DA 1, and DA 2.

Scott McLeod, Alaska Ravenguides

Comments from email submitted on February 4, 2010

SM 1: After reading the draft on environmental assessment for the setting of carrying capacities on the Petersburg Ranger District, it was alarming that it indicated roughly 10 times the carrying capacity for future allocations. There is a cap for nonresident hunters set by the fish & game at 120 Bears. There are 10 guides working on Kuiu. Scott McLeod, James Boyce, Bruce Parker, Eric Swanson, Brad Dennison, Dale Adams, Eli Lucas, Chuck Wagner, Jim Rosenbrook & Alisha Rosenbrook . This makes Kuiu FULLY ALLOCATED. This does not include nonguided transporters as we do not know how many there are. This adds to the impact on the resource. We are at capacity. I believe the bears are stressed to the maximum. Added stress would only compound the problem. Please consider GMU4 Shoreline EIS & carry this over to Petersburg Ranger District. As a guide with a [sic] unsure future on Kuiu, instead of adding hunts, Decrease the # of hunts. Less Encounters & greater outdoor experience [sic].

Response: The District agrees that Kuiu is fully allocated for guided black bear hunters. See response to BD 3. The District has very little data on unguided transporter use since they are not required to report use to the agency. We agree that they have an influence on recreational use for guided and unguided users.

Dale Adams, Master Guide

Comments from email/letter submitted on March 10, 2010

DA 1: Whoever came up with the selection of the recreation places did not keep in mind there is a major difference between places that can be used by recreational kayakers for example, versus places that provide opportunities for Outfitter/Guides to conduct a viable business that can support a family and contribute to the local economy of Southeast Alaska. As examples, let's look at a couple of recreational places in study area 14, a guide use area where I am very familiar. Place no. 21060- Horseshoe Island, 21061- Entrance Island, 21122- North Rocky Pass. This area, one that was used to determine the amount of commercial use has very little commercial use value to offer to the public. There are no

lakes, no fish, no streams, no waterfalls, no tideflats, not even bears in the spring let alone in the fall when the bears are up the creek eating fish. Nothing special other than maybe a camp spot of which very little is done as 95% of guided trips of any kind take place aboard liveaboard boats.

Response: You are correct, some recreation places¹ do not correlate with guided black bear hunting; however, in this analysis the District is considering all commercial and non-commercial recreational activities. Some of the areas you mention have been used for camping by unguided recreation users. PRD's use records show outfitter/guide day use at Horseshoe Island.

It is important to note that recreation places are not solely used to determine the District's recreation use carrying capacity, since they are also used for other planning efforts. They are reviewed by recreation specialists during project planning to analyze a project's potential effects on recreation.

Recreation places on PRD were identified by recreation resource specialists using their local knowledge to determine probable use areas and from field surveys that revealed areas used for recreation. Actual use reports submitted by outfitters and guides also provide the District information about places that get used for recreation activities.

In order to provide a better opportunity to capture input on recreation places in the future, we will consider including the most recent existing conditions cards and maps (see Appendix A, Part II of the EA) with our project scoping letter.

DA 2: Recreation place 21074- Port Camden Anchorage. What does this spot have to offer than a place to camp of which little to none is done spring or fall? Remember, 2 out of 3 seasons, spring and fall are primarily and historically used for guided hunters which primarily use boats as the base of operations for the nonresident paying client.

Response: You make a valid point. This recreation place was put in the database in the late 1980s and no longer appears valid. The place will be deleted from the database. It will not affect this document, but it will affect future planning projects.

¹ Recreation places are areas determined to be important for recreation use. They include a *recreation attractor*, such as a trail, a lake, a dispersed campsite, a fish stream, a cave, unique geology, a beach or an anchorage.



Full moon over logging transport facility at Kake Portage, Alaska. Kake is located on the northwest side of Kupreanof Island. Photograph by Heath Whitacre.

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