

# **APPENDIX B**

## **Wilderness Needs Assessments**



# Commercial Services Needs Assessment for the Petersburg Creek – Duncan Salt Chuck Wilderness Petersburg Ranger District Tongass National Forest

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## EXECUTIVE SUMMARY

The Petersburg Ranger District, Tongass National Forest, developed the Commercial Services Needs Assessment for the Petersburg Creek – Duncan Salt Chuck Wilderness (Needs Assessment) to determine the type, extent, and location of outfitter/guide use that could take place in the Petersburg Creek – Duncan Salt Chuck Wilderness (PCDSCW). A needs assessment is a method for determining if there is a 'need' for private enterprise to assist the agency in providing access, services and/or other assistance for the recreating public to safely and properly enjoy National Forest Wilderness Areas, and if so, the extent necessary. This document is tiered to the Tongass Forest Plan as amended in February 2008 and the *Determination of Need for Commercial Services within Wilderness Areas on the Tongass National Forest* (USDA Forest Service 2007).

The PCDSCW area includes Petersburg Creek which spills down a typical u-shaped glacier-cut basin with mountain peaks overlooking the valley and the Duncan Salt Chuck, a large, tidally influenced salt marsh with opportunities for bird watching, kayaking, salmon and trout fishing, hunting, and exploring. The PCDSCW area has a moderate to high quality of wilderness character. It is highly untrammeled; the area largely operates without human management or manipulation. The ecosystems are largely intact with few non-native species and good native populations, providing for a high level of naturalness. There is little human development in the wilderness. The solitude or primitive and unconfined recreation opportunities are moderate to high depending upon the location and season that a person is visiting the wilderness. The lower Petersburg Creek area has the highest boat and foot traffic, while most of the wilderness can experience aircraft over-flights. The PCDSCW area also provides many opportunities for solitude.

As managers, the Forest Service (FS) will strive to maintain a natural environment so that it may be relatively free from modern human manipulation and impacts and relatively free from the encumbrances and signs of modern society. The FS will strive to maintain a balance of uses by authorizing permitted operators to conduct suitable activities in a Wilderness setting while the casual, unguided visitor may also have an opportunity for solitude. The FS will continue monitoring to ensure that the balance is properly maintained.

A commercial services needs assessment for freshwater fishing, remote setting nature tours (RSNT) and hunting is as follows:

**Freshwater fishing:** Low amounts of guided fishing takes place within this Wilderness Area, although Petersburg Creek is one of the highest recreational use fishing areas on the Petersburg Ranger District. The guided use has ranged from 10 RVDs in 2002, to 1 RVD in 2005 (Table 1). The primary location for fishing is Petersburg Creek. There have been impacts in the past from steelhead fishers camping along the stream banks. If a new proposal was submitted for overnight use, development of a *Leave No Trace* plan specific to that campsite would be necessary for a successful outcome. In the past decade there has been an increase in the amount of jet skiff traffic on Petersburg Creek. This has resulted in concerns about damage to fish habitat, and it has affected fishers in the stream when the boat passes them. If a guide proposed using a jet skiff to travel up the stream, the Plan of Operations should address how to minimize the impacts.

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By having guided recreationists using Petersburg Creek, the Forest Service will be able to work in a partnership with the operator to ensure there will be minimum impacts to the wilderness resource and the public will receive education in wilderness ethics and *Leave No Trace* practices.

Fishing from boats in the saltwater is an activity that occurs off National Forest System lands and therefore is not an activity regulated by the US Forest Service.

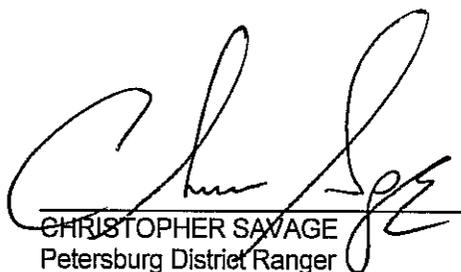
**Commercially guided freshwater fishing in the Petersburg Creek – Duncan Salt Chuck Wilderness will be authorized through this needs assessment.**

**RSNT:** Visitors in this category access the area via watercraft or floatplane. Having the knowledge, skills, experience, and equipment, even in good weather, to navigate the waters of Southeast Alaska or to fly into the lake, are things the average visitor may not have. Boat taxis from nearby Petersburg can drop hikers off for independent walks. Through interpretation of the areas natural and cultural history, guides can increase the appreciation of the area for the people they are serving, as well as help minimize resource impacts through *Leave No Trace* education. Cruise ships have historically brought large tour groups onto the Petersburg Lake Trail but their use stops before the wilderness boundary.

**Commercially guided RSNT in the Petersburg Creek – Duncan Salt Chuck Wilderness will be authorized through this needs assessment where the standards for a Primitive ROS experience can be met.**

**Hunting:** There has been concern expressed by hunters and guides that overcrowding is occurring on the Tongass for bear hunting. The Forest Service is not aware of this being an issue specific to the Petersburg Creek – Duncan Salt Chuck Wilderness. The State of Alaska does not allow black bear hunting in the Petersburg Creek drainage, which leaves open only the Salt Chuck area. Over a five year period, 2002 had 2 RVDs for hunting while the other years had zero RVDs (Table 1). The Duncan Salt Chuck is accessed either by flying in via floatplane or by small boat from Petersburg. The channel that accesses the salt chuck is rife with scattered rocks and restricted by the tides, making it difficult for the uninformed boater to navigate. Having a guide will improve the safety for boating into the salt chuck. To minimize impacts to recreationists who have rented the public recreation cabin in the Duncan Salt Chuck, the operators should have a strategy to use the bay in a manner that would minimize impacts to the cabin users.

**Commercially guided hunting in the Petersburg Creek – Duncan Salt Chuck Wilderness will be authorized through this needs assessment.**

  
CHRISTOPHER SAVAGE  
Petersburg District Ranger

11/25/09  
Date

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## I. Introduction

The Petersburg Ranger District, Tongass National Forest, developed this Needs Assessment to determine the type, extent, and location of outfitter/guide use that could take place in the Petersburg Creek – Duncan Salt Chuck Wilderness (PCDSCW). Needs assessments are a tool use to determine if there is a ‘need’ for commercial enterprise to assist the agency in providing access, services and/or other assistance for the recreating public to safely and properly enjoy National Forest Wilderness Areas, and if so, the extent necessary. This document is tiered to the Tongass Forest Plan as amended in February 2008 and the *Determination of Need for Commercial Services within Wilderness Areas on the Tongass National Forest* (USDA Forest Service 2007).

Commercial activities identified in the Tongass National Forest needs assessment that currently take place in this Wilderness Area include:

- freshwater fishing;
- black bear hunting; and
- remote setting nature tours (RSNT).

### Assumptions

The following are assumptions made to aid in the assessment of the need for outfitter/guide operations:

- Visitor use is expected to remain at current levels or continue to increase (TLRMP Amendment Record of Decision 2008). There may be shifts in use patterns (timing and location) and user types (hikers, backpackers, day users, etc.). However, with the current economic downturn, it is difficult to predict if this expectation will remain true for the next 2-5 years.
- Some people will not visit the wilderness without an outfitter or guide because they lack the skills, knowledge, equipment, or ability to do so on their own.
- Conflicts between outfitter/guide operations and the non-outfitted/guided public have the potential to increase as overall use increases.

Activities proposed by guides are wilderness dependent (i.e. experience depends upon a wilderness setting) and appropriate to a wilderness setting.

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## II. Wilderness Management Direction

See Appendix 1. Wilderness Management Direction.

### **Goals and Objectives for Wilderness**

Manage designated Wilderness to maintain an enduring wilderness resource while providing for the public purposes of recreational, scenic, scientific, educational, conservation, and historical use, as provided in the Wilderness Act of 1964 and ANILCA.

- Manage wilderness as a place where self reliance and primitive skills are needed and can be honed by the public.
- Provide for public use of the wilderness in accordance with ANILCA provisions for motorized and non-motorized access and travel, including reasonable access to traditional subsistence resources.
- Provide trails and primitive facilities that are in harmony with the natural environment and that promote primitive recreation opportunities. Feature facilities designed primarily to provide

resource protection and encourage smaller group size. Facilities and trails tend to allow for challenge and risk instead of convenience.

- Maintain the wilderness to provide information on natural ecological processes.
- Preserve and perpetuate biodiversity. Inventory and reduce or eliminate invasive species in wilderness.

### III. Visitor Use and Commercial Use

#### Historical Use of the Wilderness Areas by Outfitters and Guide

Since 2002, permitted use has included fishing, big game hunting, and sightseeing (remote setting nature tours). There is sightseeing from kayak groups boating up Petersburg Creek but they rarely come ashore. Note that in the Petersburg Ranger District Recreation Use Carrying Capacity Report (2009), Petersburg Creek is considered within the home range of Petersburg and the City of Kupreanof. As a result, a smaller portion of recreation use is allotted to commercial operators on Petersburg Creek.

Actual use has ranged from two permit holders using two recreation visitor days (RVDs) in 2008, to three operators with 10 RVDs in 2002 (Table 1).

**Table 1. RVDs used by Outfitters/Guides from 2002 through 2008.**

Activity	2002	2003	2004	2005	2006	2007	2008
Fishing	10	2	4	1	3	5	0
RSNT*	0	0	0	0	0	0	0
Black bear or wolf hunting	0	0	0	2	0	0	2
Total RVDs	10	2	4	3	3	5	2

\*RSNT – remote setting nature tours, includes sightseeing, hiking, wildlife viewing, etc. at remote sites (not accessed by road system).

#### Niche and Description

Petersburg Creek spills down a typical u-shaped glacier-cut basin with mountain peaks overlooking the valley. With the close proximity to the communities of Petersburg and Kupreanof, the mouth of the creek is enjoyed by residents of Petersburg, Kupreanof, and visitors alike, for picnicking, fishing for salmon and steelhead, paddling, and hiking. The Petersburg Lake Trail and the primitive Portage Mountain Loop trail allow access to two Forest Service public cabins. The Duncan Salt Chuck, a large, tidally influenced salt marsh, offers wonderful opportunities for bird watching, coho and trout fishing, hunting, and exploring.

The 46,849 acre wilderness is composed of two major sections: the Petersburg Creek watershed, and the area surrounding the salt chuck at the head of Duncan Canal. The eastern border of the wilderness is about five miles west of the City of Petersburg. It abuts the small community of Kupreanof on the east. The western side of the wilderness can be reached by boating or flying to the Duncan Salt Chuck at the northern end of Duncan Canal. Petersburg Lake is in the central portion of the wilderness and can be reached by hiking or flying into the lake.

#### Existing Condition

One way existing condition can be assessed is to divide wilderness character into the four components of untrammeled, natural, undeveloped, and opportunities for solitude and primitive and unconfined recreation:

- ❖ Untrammeled. This quality describes the degree to which management actions “hinder” or “control” the land and natural processes. For example, the Wilderness Area has

remained free of management activities that have altered natural systems, such as dams or regulations that govern visitor activities

- ❖ Natural. This quality describes the ecological effects of management actions that manipulate vegetation, soils, air quality, or other physical and biological components of wilderness. Wildlife found within the area includes black bear, Sitka black-tailed deer, and wolf. Moose exist in the area, but in relatively small numbers. The list of smaller fur bearing animals common to the area include beaver, mink, American marten, land otter, and weasel. Annual surveys for native and non-native plants began in 2003. The Wilderness Area has relatively intact native plant communities, with the exceptions being a significant population of brass button (*Cotula coronopifolia*) in the upper Duncan Canal tideflats, and other minor plant populations at existing public and special use cabin locations.
- ❖ Undeveloped. This quality describes the effects of structures, habitations, or other evidence of human presence or occupation. There are two public recreation cabins within the Wilderness Area, one at Petersburg Lake and one in the Duncan Salt Chuck. There are three special use cabins located four miles up from the mouth of Petersburg Creek. The Petersburg Lake Trail is 10.4 miles long, with six miles inside the wilderness from the high tide trailhead to the Petersburg Lake cabin. Approximately ½ of the trail is single wide wood plank with the remainder native tread.
  - The Petersburg Creek drainage is an often used flight path for local airplane traffic enroute to Kake or other westerly destinations from the Petersburg airport or harbor.
  - Floatplanes land on Petersburg Lake, primarily transporting people to and from the cabin. In general, the expectation is that there will be less evidence of human occupation as one travels farther inland away from the shoreline.
  - Although there have not been surveys for general public use levels, field crews have noticed an increase in the amount of jet boat traffic on Petersburg Creek and an increase in the distances traveled up the creek.
- ❖ Opportunities for solitude and primitive/unconfined recreation. Visitors to the upland of the Wilderness Areas can expect a low-to-moderate probability of experiencing isolation from most sights and sounds of humans. Jet skiffs are commonly used to access the lower Petersburg Creek drainage, so visitors will see and hear jet boat, outboard, or even jet ski traffic on the lower creek. “The Logjam” is typically the upper limit for jet skiffs, approximately six miles up from the Wrangell Narrows. Historically outboard skiffs went only up the creek on extreme high tides, but the advent of jet skiffs has created higher levels of motorized use during a wide range of water levels. Small aircraft use the drainage as a flight route so airplanes are a common sight and sound. As an example, crews who were monitoring on July 15, 2008 between 0700 and 1800 hours counted 14 over-flights that included helicopters, floatplanes, and a jet. Visitors on the lower creek can often hear distant noises from the community of Petersburg, including noises from the canneries, ferries, and airport.
  - The Duncan Salt Chuck area receives much lower boat use than the Petersburg Creek area, since the salt chuck is about 40 water miles from town and because the rapids at the mouth of the Salt Chuck can only be navigated at high slack tide. It is unusual to see another boat there. The sights and sounds of aircraft are comparable to, or higher than, the numbers for the Petersburg Creek drainage since over-flights include those that use the Petersburg Creek route, as well as flights from the more frequently used Duncan Pass route.

Within 30 days of the end of the operating season, commercial outfitter/guide permit holders submit an Actual Use Report that lists the locations (latitude and longitude), type of use, number of clients, and length of stay at each location. From this information, the Forest Service can determine the number of RVDs

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utilized at each location, by each group (Table 2). It also provides a mechanism to monitor the amount of use at each location. The actual use information is then used to help determine the areas that get field checked.

**Table 2. Number of outfitters/guides that used the Petersburg Creek – Duncan Salt Chuck per year.**

Year	Number of O/G
2002	3
2003	1
2004	1
2005	2
2006	1
2007	3
2008	2

### Desired Condition

The Wilderness Act of 1964 directs “each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area.” Section 2(c) of the Act defines four qualities of wilderness that managers try to preserve.

As described in the 2008 Amended Forest Plan,

All designated wilderness on the Tongass National Forest is characterized by extensive, unmodified natural environments. Ecological processes and natural conditions are not measurably affected by past or current human uses or activities. Users have the opportunity to experience independence, closeness to nature, solitude, and remoteness, and may pursue activities requiring self-reliance, challenge, and risk. Motorized and mechanized use is limited to the minimum needed for the administration of the wilderness. Allow for access to state and private lands, subsistence uses, and public access and other uses to the extent provided for by ANILCA.

- **Untrammeled** – *The wilderness is essentially unhindered and free from modern human control or manipulation.*  
The desired condition is an improving or stable trend in actions that control or manipulate the wilderness. These actions include ones that manipulate plants, animals, pathogens, soil, water, or fire, whether authorized or unauthorized by the Forest Service.
- **Natural** – *Wilderness ecological and evolutionary systems are substantially free from the effects of modern civilization.*  
The desired condition is for the trend of the effect of modern civilization on plant, animal, pathogen, physical, and biophysical resources to be stable or decreasing.
- **Undeveloped** – *Wilderness retains its primeval character and influence and has minimal evidence of modern human occupation or modification.*  
The trends in recreational and non-recreational developments, use of motor equipment and transport, and loss of statutorily protected cultural resources is stable or decreasing.
- **Outstanding opportunities for solitude or a primitive and unconfined type of recreation** – *Wilderness provides outstanding opportunities for people to experience natural sights and sounds, solitude, freedom, risk, and the physical and emotional challenges of self-discovery and self-reliance.*

The trend is stable or improving for: remoteness from sights and sounds of people inside and outside wilderness; number of facilities that decrease self-reliant recreation; number of trails and level of trail classes; and amount of management restrictions on visitor behavior.

## Recreation Opportunity Spectrum (ROS) and Visitor Capacity in the Petersburg Creek – Duncan Salt Chuck Wilderness

ROS is a system for inventorying and categorizing recreation experience opportunities into seven classes as identified in the Tongass Land Management Plan. Each class is defined in terms of the degree certain recreation opportunities are possible based on the extent the natural environment has been modified, types of facilities provided, the number of interactions expected with other groups of people, and the relative density of recreation use.

The PCDCSW is practically all in the Primitive ROS class. We consider ROS standards and guidelines when looking at the need for guided services (Appendix 2, description of this ROS class). The Forest Plan directs us to manage wilderness recreation activities to meet appropriate levels of social encounters, on-site development, methods of access, and visitor impacts indicated for the Primitive ROS class.

Visitor use capacity is the approximate number of people that can visit a portion of the National Forest while having the prescribed recreation (ROS) experience, consistent with the desired conditions. The reason to determine capacity is twofold: to ensure both that visitors can enjoy recreational experiences that meet their expectations and ensure that the landscape can sustain the given level of use. Knowledge of existing use, projections of future demand, capability of an area to withstand impact, and useable terrain can be analyzed to determine capacity. For example, an area accessed by foot with multiple valleys to hunt would have a greater ability to accommodate a higher capacity of users than a small alpine lake, accessed seasonally by float plane, with one flat site for camping. Another challenge is that different recreation user groups may have different expectations; i.e., a group of six people from a tour boat that has 300 people aboard may have a different comfort level with seeing other people on shore in the wilderness, as compared to the solitude anticipated by a pair of sea kayakers who have not seen any people for several days.

There are several aspects in determining capacity, including social, biophysical, managerial, and facility capacity:

- **Social.** This refers to the sights and sounds of other people, which may impact the group's experience:
  - *Is this an area heavily used by residents?*
  - *Can people spread out over the area with little chance of encounters?*
  - *How long is the useable season?*
  - *Are there other types of recreation use that are not compatible with the proposed use?*
- **Biophysical.** This refers to the biological resources found in the area potentially impacted by visitors. Biophysical attributes influence whether a setting is capable of providing a particular recreation opportunity without degrading an area's ecological processes, structure, composition, resilience, integrity, potential, as well as the setting's ability to restore itself and provide for other resource uses and values:
  - *Are there plant or wildlife concerns?*
  - *Are campsites and travel routes located on durable surfaces?*
  - *Are user-created trails causing erosion or other unacceptable impacts?*
- **Facility.** This refers to physical attributes of the area that make it useable by visitors:
  - *How many campsites are available?*

- *Are there adequate locations for camps?*
- *Are there adequate anchorages in the saltwater?*
- *Is access by foot, water, or plane easy or difficult?*
- **Managerial.** This refers to policies, management objectives, or rules that can increase or decrease visitor capacity in an area.

Once a need is determined, we estimate the capacity of the area to accommodate the activity by evaluating terrain, screening, campsite availability, and other factors. See the 2009, Recreation Use Carrying Capacity Report for Petersburg Ranger District.

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## IV. Special Knowledge and Skills Needed for Activities in the Petersburg Creek – Duncan Salt Chuck Wilderness

### Potential Categories of Public Need<sup>1</sup> for Commercial Services

Guides can serve as important partners for the Forest Service. In particular, guides can provide wilderness awareness, wilderness ethics education, and *Leave No Trace* education. Resource protection activities, such as reporting of invasive plants and illegal activities have been helpful in the past and could help the Wilderness Areas achieve a higher level of wilderness character. Guides can help build constituency and support for wilderness among those groups of people who might not be exposed through typical outreach (for example, big game hunters).

The following are potential categories of public need for commercial services within the Petersburg Creek – Duncan Salt Chuck Wilderness:

- People with physical limitations;
- People pursuing activities where knowledge, equipment, and skill needed makes unguided use extremely difficult if not impossible. In addition, people pursuing activities where the opportunity does not exist outside of wilderness;
- People wanting to take trips that focus extensively on wilderness; or
- Wilderness stewardship activities that could be enhanced by outfitter/guides.

### Process for Determination of Public Need

“Public need” is a need determined to be essential for the well being of the entire public, guided and unguided, or to meet the intent of the Forest’s mission to manage and protect resources, provide for public safety, and to provide high quality recreation services. Within wilderness the intended use should be dependent on the wilderness resource. **A guide wanting a permit does not always mean there is a public need.**

Evaluation Criteria used for determining the need for outfitter assistance in the management of the Wilderness Area:

Wilderness Dependency. The extent the proposed service can be offered on private or non-wilderness national forest lands. Some examples of these services could be:

- <sup>1</sup> A desire for commercial services or the fact that the presence of a guide could enhance a visitor’s experience should not be confused with “need.”

- a. Trips in which solitude and unconfined, primitive recreation are the central components of the experience.
- b. Visits to ecosystems, geological, or physical resources found in wilderness for recreational, scientific, or educational purposes.

Forest-wide availability. Does this activity occur elsewhere in other wildernesses on the Tongass? For example, if an activity occurs in abundance in other areas, there may not be a need to accommodate it in these Wilderness Areas.

Wilderness Character. Will outfitter/guide activities preserve or improve the four qualities of wilderness character? Alternatively will outfitter/guide activities degrade wilderness character? For example, will the natural quality or the primitive recreation quality be impacted by an increase in fishing guides? Will the natural quality or primitive recreation be improved by outfitter/guides that are well-trained in *Leave No Trace* education?

Skills and Equipment. Outfitter/guide skills and equipment are needed by a portion of the public because of one or more of the following:

- a. Specific skills required for activities appropriate for the area require substantial time and/or talent to learn.
- b. Learning necessary skills and participating in the activity requires acquisition and consistent use of expensive, specialized equipment for which the public could not, or normally would not, expend the dollars or time.
- c. The skills required are so unique that the use of a guide is almost a prerequisite if the public is to have any opportunity to participate in and enjoy the activity.

Knowledge. Guide knowledge of the wilderness resource and the activity area is needed by the public, and especially nonresidents, in order to enjoy recreational opportunities in a manner that reduces resource damage and user conflicts. This includes knowing where and by what method to best access and travel through an area.

Safety. An outfitter/guide's special skills and equipment are needed for a reasonable level of safety for the participants. Without guide assistance, members of the public could seriously endanger their health or lives, or would not visit the wilderness due to safety concerns. These criteria are not meant to diminish the wilderness values of self-reliance or the opportunity to challenge oneself or experience a degree of risk.

Special Management Objectives and/or Issues. An outfitter/guide is needed to ensure special management objectives are met and/or issues resolved. Examples include recreational opportunities for disabled populations, instilling a wilderness ethic in clients, contribution to rural area development and economy of formerly commodity based areas, and assistance in reducing critical resource impacts and/or conflicts between users.

Extent Existing Outfitter/Guide Permits are Being Utilized. Are current outfitted or guided assignments booked or over-booked, indicating a larger interest in the service?

Level of Use and Conflict. Are there conflicts between types of users, private and commercial, in the wilderness? What is the compatibility of commercial, institutional, and general public use, and the amount of use and social capacity within a given area of the wilderness? Are use patterns (congestion and number of encounters) a potential problem? Is there a temporal congestion pattern—weekend use versus weekday use, day versus overnight use? Over time, what is the general trend? Is the projected future condition compatible with desired future condition?

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Land Capability & Resource Concerns. Can the guide contribute to the protection of the land through his/her educational emphasis? What is the level of interference an outfitter/guide operation will have with the natural biological and physical processes of the wilderness? Can a guide help minimize impacts from camping by applying *Leave No Trace* skills by choosing beach campsites that are durable, yet also safe for overnight use? Can the guide help minimize campfire resource damage by teaching the best methods of building fires? Can a fishing guide help minimize streamside impacts, including stream bank erosion and fishing tackle litter?

Public purpose. The Wilderness Act Section 4(b) specifies “wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.” Guide services must help fulfill these purposes of wilderness. Does this activity contribute to the public purposes established for this wilderness? When considering the extent necessary, can people reasonably participate in this activity without a guide or is having a guide a prerequisite? Does this activity serve a broad segment of the population or is it limited to a select few?

Type of Activity and Criteria	Rating Summary
<p style="text-align: center;"><b><u>Fishing/day hiking</u></b> <b><u>(freshwater - foot travel)</u></b></p> <p>Wilderness dependency</p> <p>Forest- wide availability</p> <p>Wilderness character</p> <p>Skills and equipment</p> <p style="padding-left: 40px;">Knowledge</p> <p style="padding-left: 40px;">Safety risk</p> <p style="padding-left: 40px;">Special objectives</p> <p style="padding-left: 40px;">Demand/utilization</p> <p>Level of use and conflict</p> <p style="padding-left: 40px;">Land capability</p> <p style="padding-left: 40px;">Public purpose</p>	<p>Low; other streams available</p> <p>High</p> <p>Low impact</p> <p>Moderate to low. Moderate cost for equipment</p> <p>Moderate</p> <p>Low to moderate</p> <p>Low</p> <p>Moderate</p> <p>Low</p> <p>Moderate, hiking trail provides durable access</p> <p>High – recreation and scenic</p>
<p style="text-align: center;"><b><u>RSNT (including day kayaking)</u></b></p> <p>Wilderness dependency</p> <p>Forest- wide availability</p> <p>Wilderness character</p> <p>Skills and equipment</p> <p style="padding-left: 40px;">Knowledge</p> <p style="padding-left: 40px;">Safety risk</p> <p style="padding-left: 40px;">Special objectives</p> <p style="padding-left: 40px;">Demand/utilization</p> <p>Level of use and conflict</p> <p style="padding-left: 40px;">Land capability</p> <p style="padding-left: 40px;">Public purpose</p>	<p>Moderate – few areas</p> <p>Low to moderate – few places on the Tongass with similar easy access</p> <p>Low impact</p> <p>Moderate skill required</p> <p>Moderate to low, depending on location</p> <p>Moderate (bears cold water, protected waters)</p> <p>Moderate</p> <p>Low</p> <p>Low</p> <p>Moderate</p> <p>High – non-motorized transportation, traditional skills development</p>

Type of Activity and Criteria	Rating Summary
<b><u>Big game hunting</u></b>	
Wilderness dependency	Low; other areas available
Forest -wide availability	High
Wilderness character	Low impact with LNT
Skills and equipment	High skill required – high cost/equipment
Knowledge	Moderate
Safety risk	High
Special objectives	High
Demand/utilization	Moderate
Level of use and conflict	Moderate
Land capability	Moderate

## V. Need for and Extent of Commercial Use in the Petersburg Creek – Duncan Salt Chuck Wilderness

### Freshwater fishing

#### Wilderness dependency.

- a. **National Forest System (NFS) land.** Opportunities exist outside of the Wilderness Area for freshwater fishing. Approximately two-thirds of the Tongass National Forest, including the fresh water streams, is not designated wilderness. Most of the non-wilderness streams in Southeast Alaska are open for fishing, with a reasonable chance of success.
- b. **Non-NFS land.** Opportunities for fishing and day hiking are limited. The majority of Southeast Alaska, including the fresh water streams, is within the Tongass National Forest, and the opportunity for freshwater fishing is proportionate.

Forest-wide availability. The Tongass offers this activity in other Wilderness Areas.

Wilderness character. Use is temporary in nature and would not negatively impact the qualities of naturalness, untrammled, and undeveloped. Guided and unguided groups alike tend to hike and fish in the same attractive areas. Impacts to opportunities for solitude and primitive and unconfined recreation could occur, particularly in those areas where screening by vegetation and topography is low.

Skills and equipment. Unguided freshwater fishing is common in the Petersburg Creek drainage, and to a lesser extent in the salt chuck area. Guided fishing is less common. Fishing for steelhead is primarily in April and May, trout fishing is during most of the year, and coho is popular in August and September. There is no special skill needed for fishing, although fly-fishing can take some time to master. The uplands along Petersburg Creek are accessed by the Petersburg Lake Trail. Guides can impart knowledge of catch and release techniques, where the runs are occurring, fish identification, avoiding bear encounters on fish streams, and proper fish disposal methods. In addition, a boat is normally needed for access and not all persons have the skills to successfully navigate a boat to this area, given the need for local knowledge of the area (weather, tides, etc.).

Knowledge. A guide can provide assistance and information to visitors who are unfamiliar with the terrain and environment of Southeast Alaska. Many non-resident visitors do not where to hike or fish safely and successfully.

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Safety risk. Hazards encountered might include black bears, getting lost, slips and falls, and hypothermia. The presence of an outfitter/guide can contribute to a feeling of safety. A portion of prospective wilderness visitors may not visit the area on their own because of concerns for their safety.

Special objectives. Outfitters and guides promote proper catch and release techniques and an understanding of population dynamics in isolated streams and lakes. Outfitter/guides are required to turn in freshwater fishing logs to ADF&G. Results of these are used to determine non-resident fishing harvest.

Demand/utilization. There have been few requests for this activity in the past ten years. Relative to the rest of the District the demand is high on Petersburg Creek for fishing, but the majority of this use is unguided, and a good portion of it does not take place on National Forest or within PCDSCW. Most of the fishing takes place from boats on the lower reaches of the stream in the intertidal area.

Level of use and conflict. There have been some conflict-of-use reports on Petersburg Creek between fly fishers and jet skiffs. Conflicts include boats passing fishers standing in the water, and logs in the stream being cut out to allow passage of boats upstream of the logjam.

Land capability. Currently, resource concerns from fishing includes litter along stream banks, development of 'fishing paths', removal of large woody debris from streams to allow for passage by small boat (such as cutting logs at the "log jam"), and displacement of wildlife.

Resource concerns from fishers who overnight camp include tree-cutting, litter, fire rings, and social trails. Most of the camping occurs in the lower reaches of Petersburg Creek. There are currently three known impacted campsites in the wilderness. Campsite monitoring measurements have shown that the amount of impact has varied. Some years the campsites receive significant impacts, but then a span of time occurs with no use. This allows some of the sites to revegetate. Education efforts should encourage the concentration of impacts on the previously used campsites, since there are few durable sites within the wilderness.

Public purpose. This activity contributes to the recreational purpose (fishing).

### Remote Setting Nature Tours (RSNT)

Wilderness dependency.

- a. **National Forest System (NFS) land.** Opportunities exist outside of the Wilderness Area for RSNT. Approximately two-thirds of the Tongass National Forest is not designated wilderness.
- b. **Non-NFS.** Opportunities for RSNT are limited. The majority of Southeast Alaska is within the Tongass National Forest, and the opportunity for RSNT is proportionate.

Forest-wide availability. The Tongass offers this activity in several other Wilderness Areas.

Wilderness character. While floatplanes are allowed on lakes through enabling legislation (ANILCA), permitting guides to conduct this activity does allow a higher level of motorized activity and could contribute to a loss of solitude in these areas. As long as these activities are low levels of use, day-use, and temporary in nature, they will not be expected to significantly impact the natural, untrammelled and undeveloped qualities already present.

Skills and equipment. RSNT activities include sightseeing, kayaking, hiking, and wildlife viewing, at remote (non-road system NFS lands) locations. Hiking is a skill that is relatively easy to master. Hiking equipment can be obtained at relatively inexpensive prices at stores nationwide. Wildlife viewing equipment such as spotting scopes, cameras, and binoculars are obtained at various locations nationwide or they can be provided by the outfitter/guide. For flight seeing, an aircraft is required, which the average visitor would not own.

Knowledge. A guide can provide assistance and information to non-resident visitors who are unfamiliar with the terrain and environment of Southeast Alaska. It is unlikely that the average non-resident visitor would possess the knowledge where to hike, view wildlife and spectacular scenery safely and successfully. Many visitors do not have the knowledge to safely navigate the tidal flat and waters to reach this area. Guides can teach visitors the techniques of how to minimize their impacts while hiking through the forest or muskegs. Guides who frequent the area also have the historical knowledge of the area of where the best durable trails are located, as well as what areas to avoid due to previous impacts.

Safety risk. Hazards encountered might include bears, slips and falls, sudden weather changes, and hypothermia. The presence of an outfitter/guide could contribute to the safety of non-resident visitors. A portion of prospective wilderness visitors would probably not visit the area on their own because of concerns for their safety.

Special objectives. There is a need for outfitters and guides to provide services to educate the public regarding the wilderness resource and *Leave No Trace*. Visitors who learn these skills can use them in other Wilderness Areas. Outfitters whose trip emphasis is based on appreciation for the wilderness and educating clients and instilling a wilderness ethic can assist in meeting this management objective. An outfitter can also inform the Forest Service of their observations, including other groups seen and resource damage observed.

Demand/utilization. See next paragraph.

Level of use and conflict. Current level of guided use is low. The lower Petersburg Creek area (inside and outside wilderness) receives a high amount of unguided use, primarily people in power boats, kayaks on day trips, or hikers coming up the trail. There is guided kayak use on the lower creek, but it is usually before the wilderness boundary.

Land capability. An outfitter/guide must educate visitors on *Leave No Trace* techniques and show them how to minimize visitor impacts from RSNT.

Public purpose. This activity can contribute to the recreational purpose (RSNT).

## Hunting.

### Wilderness dependency.

- a. **National Forest System (NFS) land.** Opportunities exist outside of the Wilderness Area for hunting. Approximately two-thirds of the Tongass National Forest is not designated wilderness. Most of the non-wilderness lands in Southeast Alaska are open for hunting.
- b. **Non-NFS.** There are fewer opportunities for hunting in the vicinity on private or state lands. The majority of Southeast Alaska is National Forest system lands, and the opportunity for hunting is proportionate.

Forest-wide availability. Guided hunting is offered in other Wilderness Areas on the Tongass, and across most of the other land use designations.

Wilderness character. ADF&G sets harvest levels. Most clients and guides live on a boat and spend very little time in the upland areas of the wilderness during a typical day hunt. Guided hunting should have little effect on wilderness character.

Skills and equipment. Hunters need to have the skill to identify and stalk, in a dynamic, challenging environment, and do it in a way that is respectful of the wildlife and the wilderness resources. While it is hoped that most hunters will follow proper procedures, a guide can ensure that ethical hunting practices and procedures are followed.

Knowledge. Guides are knowledgeable about animal behavior, as well as how to avoid areas where conflict may occur with other recreational or subsistence users. This information is not readily available to the average nonresident hunter. Guides can ensure that a hunter knows the appropriate *Leave No Trace* practices for the rainforest environment.

Safety risk. Hazards that might be encountered include wounded black bears. Guides generally have more knowledge about how to track and retrieve animals and have back-up rifles in case of emergency. There have been infrequent maulings of hunters by black bear.

Special objectives. Guides can help accomplish ADFG's harvest objectives and can ensure that hunters care for and process the carcass in accordance with state law. The guide hunt records, turned in to the Commercial Services Board, help track harvest locations and hunter success rates. Since Duncan Salt Chuck is a valuable waterfowl area, there is potential for a permit request for waterfowl hunting. This would be an appropriate use and would not interfere with other recreationists since the use levels are low due to reasons previously stated.

Demand/utilization. There is little demand for guided hunting in this wilderness. One reason is the State of Alaska has the Petersburg Creek drainage closed to black bear hunting. The Duncan Salt Chuck area is open for bear hunting and has been used occasionally by one permit holder. The Petersburg Ranger District has a maximum number of 188 black bear hunts authorized to outfitter/guides per year on the entire district.

Level of use and conflict. The State has designated the Petersburg Creek drainage as a bear sanctuary and is closed to black bear hunting. The current level of commercial use is low in the remainder of the wilderness, and especially in Duncan Salt Chuck. As shown in Table 1 the guided RVDs have been low and fairly stable the past five years.

Land capability. Current resource concerns from hunting are low. Unguided hunters have been known to leave carcasses at the Salt Chuck East cabin, but this has not been associated with commercial use. Guides may be able to help educate the public about proper hunting techniques.

Public purpose. This activity contributes to the recreational purpose (hunting).

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## VI. Determination of Need and Extent

As stated in the Introduction, above, this document is tiered to the Tongass Forest Plan and the *Determination of Need for Commercial Services within Wilderness Areas on the Tongass National Forest* (2007). The Forest-level Determination of Need document, states "subsequent decisions regarding the type, extent, amount, and location of commercial use for all Wilderness Areas on the Tongass must be made on a wilderness-by-wilderness basis." It further states, "Future decisions or revisions of environmental documents that allow commercial services in a Wilderness Area will be specific to each wilderness and include":

1. A statement defining the wilderness character;

2. Specific information regarding the wilderness values which require monitoring or protection;
3. A finding that commercial services are necessary for that Wilderness Area;
4. A description of the uses to authorize;
5. The amount of use to authorize; and
6. A description of the extent of activities.

The items specific to the Petersburg Creek – Duncan Salt Chuck Wilderness Area are addressed, below.

### Statement defining the Wilderness Character of the Petersburg Creek – Duncan Salt Chuck Wilderness Area

The PCDCS Wilderness Area has a moderate-to-high quality of wilderness character. It is highly untrammeled; the area largely operates without human management or manipulation. The ecosystems are largely intact with healthy native populations and few non-native species, providing for a high level of naturalness. The moderate, undeveloped character of the wilderness is affected by the two public recreation cabins, three special use cabins, six miles of improved trail (Class 3), and about 10 miles of undeveloped trail (Class 1). The solitude or primitive and unconfined recreation opportunities are moderate-to-high depending upon the location and season of use. The lower Petersburg Creek area has the highest boat and foot traffic, while most of the wilderness can experience aircraft over-flights.

### Finding or Determination of Need for Commercial Use

**Determination of need for commercial use for freshwater fishing:** Low amounts of guided fishing takes place within this Wilderness Area, although it is one of the highest recreational use fishing streams on the Petersburg Ranger District. The guided use has ranged from 10 RVDs in 2002, to one RVD in 2005 (Table 1). The primary location for fishing is at Petersburg Creek. There have been impacts in the past from steelhead fishers camping along the stream banks. If a new proposal is submitted for overnight use, the development of a *Leave No Trace* plan specific to that campsite will be necessary for a successful outcome. In the past decade there has been an increase in the amount of jet skiff traffic on Petersburg Creek. This has resulted in concerns about damage to fish habitat and effects to fishers in the stream when a boat passes. If a guide proposes using a jet skiff to travel up the creek, the Plan of Operations should address how to minimize the impacts.

By having guided recreationists using Petersburg Creek, the Forest Service will be able to work in a partnership with the operator to ensure there will be minimum impacts to the wilderness resource and the public will receive an education in wilderness ethics and *Leave No Trace* practices.

Fishing from boats in the saltwater is an activity that occurs off National Forest System lands; therefore, it is not an activity regulated by the US Forest Service.

**Commercially guided freshwater fishing in the Petersburg Creek – Duncan Salt Chuck Wilderness *will* be authorized through this needs assessment.**

**Determination of need for commercial use for RSNT:** Visitors in this category access the area via watercraft or floatplane. Having the knowledge, skills, experience, and equipment, even in good weather, to navigate the waters of Southeast Alaska or to fly into Petersburg Lake, are things the average visitor may not have. Boat taxis from nearby Petersburg can drop hikers off for independent walks. Through interpretation of the area's natural and cultural history, guides can increase the appreciation of the area for the people they are serving, as well as help minimize resource impacts through *Leave No Trace* education. Cruise ships have historically brought large tour groups onto the Petersburg Lake Trail but their use stops before the wilderness boundary.

**Commercially guided RSNT in the Petersburg Creek – Duncan Salt Chuck Wilderness *will be authorized through this needs assessment where the standards for a Primitive ROS experience can be met.***

**Determination of need for commercial use for hunting:** There has been concern expressed by hunters and guides that overcrowding is occurring on the Tongass for bear hunting. The Forest Service is not aware of this being an issue specific to the Petersburg Creek – Duncan Salt Chuck Wilderness. The State of Alaska does not allow black bear hunting in the Petersburg Creek drainage, which leaves only the Salt Chuck area open to bear hunting. Over a five year period, 2002 had two RVDs for hunting while the other years had zero RVDs (Table 1). The Duncan Salt Chuck is accessed either by floatplane or small boat from Petersburg. The channel that accesses the salt chuck is rife with scattered rocks and restricted by the tides, making it difficult for the uninformed boater to navigate. Having a guide will improve the safety for boating into the salt chuck. To minimize impacts to recreationists who have rented the public recreation cabin in the Duncan Salt Chuck, the operators should have a strategy to use the bay in a manner that would minimize impacts to the cabin users.

**Commercially guided hunting in the Petersburg Creek – Duncan Salt Chuck Wilderness *will be authorized through this needs assessment.***

### **Information Specific to PCDSCW Which Requires Monitoring or Protection of Wilderness Values**

The amount of visitor use in the lower Petersburg Creek area should be monitored to ensure a primitive recreation experience is provided. The area receives a relatively high level of use from the general public due to its proximity to the town of Petersburg.

#### **Types of uses to authorize**

Freshwater fishing

Remote Setting Nature Tours (RSNT)

Hunting

#### **Amount of use to authorize**

The amount of use in wilderness is presented in the Petersburg Ranger District Recreation Use Carrying Capacity Report (2009) using the information presented in this needs assessment.

## Appendix 1. Wilderness Management Direction

### **Wilderness Management Direction for a Needs Assessment**

Following is a discussion about when a needs assessment may be employed to address commercial use requests within wilderness when there is a regional or local wilderness management concern.

#### **Direction Provided by the 1964 Wilderness Act**

The Wilderness Act of 1964 states the purpose of Wilderness is “to secure for the American people of present and future generations the benefits of an enduring resource of Wilderness.” Wilderness being an area “affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable; . . . has outstanding opportunities for solitude or a primitive unconfined type of recreation; . . . and may also contain ecological, geological, or other feature of scientific, educational, scenic, or historical value.”

The Wilderness Act also describes how Wilderness Areas are to be used and managed. Management is to focus on preserving the wilderness character of the area; and use of the area “shall be devoted to the public purposes of recreational, scenic, scientific, education, conservation, and historical uses.” In realizing these uses wilderness provides an opportunity for solitude or primitive unconfined types of recreation not attainable in settings more man-made, or influenced by humans.

In accomplishing the purpose of, and uses of wilderness, the Wilderness Act gives some additional direction. Specifically, with one notable exception commercial enterprises are prohibited by Section 4(c) of the Act. The exception covered in Section 4(d) (6) says “commercial services may be performed within the Wilderness area . . . to the extent necessary for activities which are proper for realizing the recreation or other Wilderness purposes of the areas.”

#### **Alaska National Interest Lands Conservation Act of 1980 (ANILCA)**

Section 707 of ANILCA states; “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 ...”

Items expressly provided for in ANILCA wilderness are many. Some include;

1. Section 811 – (a) Ensures rural residents reasonable access to subsistence resources and (b) permits the use of snowmobiles, motorboats, and other means of surface transportation traditionally employed for subsistence purposes, subject to reasonable regulation.
2. Section 1010 – Mineral assessments with access by air.
3. Section 1110(a) – Allows for the use of snowmachines, motorboats, airplanes and nonmotorized surface transportation methods for traditional activities on conservation system units, including designated wilderness, and for travel to and from villages and homesites, subject to reasonable regulation to protect the natural and other values of the unit or area.
4. Section of 1303(b)(1) – Allows for the construction of new cabins and administrative cabins if necessary for the administration of the area as wilderness
5. Section 1303(b)(2) – Allows for the continuation of existing cabins.
6. Section 1310 – Allows for the maintenance of existing and future navigation aids and other facilities.

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7. Section 1315(c) – Permitting the continued use and maintenance of public use cabins. 1315(d) allows for the construction of new cabins if they're necessary for the protection of public health and safety.
8. Section 1316(a) – Allows for existing and future establishment of temporary structures necessary for the taking of fish and game subject to reasonable regulation to insure compatibility, the continuance of existing uses, and the future establishment, and use, of temporary campsites, tent platforms, shelters, and other temporary facilities and equipment directly and necessarily related to such activities. Section 1316(b) allows for the denial of the temporary facilities if the use of equipment or facilities is determined to be detrimental to the wilderness character.

During the evaluation of commercial recreation use for any one wilderness, an effort should be made to consider the long-term effects of accommodating increasing uses or proposals for new use. The economic benefits to a business are not a substantive basis of a decision to allow use presented in either the Wilderness Act or ANILCA.

### **Direction Provided by Regulation**

Federal Regulations 36 CFR 293.2 – Objectives, states in part: “Except as otherwise provided in the regulations..., National Forest Wilderness shall be so administered as to meet the public purposes of recreational, scenic, scientific, educational, conservation, and historical uses; and it shall also be administered for such other purposes for which it may have been established in such a manner as to preserve and protect its wilderness character...To that end:

- a) Natural ecological succession will be allowed to operate freely to the extent feasible.
- b) Wilderness will be made available for human use to the optimum extent consistent with the maintenance of the primitive conditions.
- c) In resolving conflicts in resource use, wilderness values will be dominant to the extent not limited by the Wilderness Act, subsequent establishing legislation, or the regulations in this part.”

Federal Regulations 36 CFR 293.8 - Permanent structures and commercial services, states in part that: “The Chief, Forest Service, may permit . . . commercial services within National Forest Wilderness to the extent necessary for realizing the recreational or other Wilderness purposes, which include, but are not limited to, the public services generally offered by packers, outfitters, and guides.”

### **Agency Direction**

#### **USDA Forest Service Strategic Plan for 2004 - 2008**

The mission of the USDA Forest Service is based on the relationship between the American people and their natural resource heritage. The relationship is founded on the principles of sustaining U.S. natural resources for future generations, producing personal and community well-being, and providing economic wealth for the Nation.

The Strategic Plan embodies the Forest Service's many areas of responsibility, as captured in the agency's mission statement:

“The mission of the USDA Forest Service is to sustain the health, diversity, and productivity of the Nation's forest and grasslands to meet the needs of present and future generations.”

One of the many goals of the Strategic Plan is to provide high-quality outdoor recreational opportunities on forests and grasslands, while sustaining natural resources, to meet the Nation's recreational demands.

In 2005, the Chief of the Forest Service adopted the 10-year Wilderness Stewardship Challenge (WSC) as recommended by the Chief's Wilderness Advisory Group. This effort is a renewal of the commitment to wilderness by pledging to bring all 406 wildernesses administered by the Forest Service to a minimum level of stewardship within 10 years. Element 7 of the WSC identifies that, "**Needs assessments are completed for new operations or for major changes to existing outfitter programs.**" As clarified in the definitions for this element; "*needs assessments*"; a methodology for determining if, in fact, there is a 'need' for private enterprise to assist the Agency in providing access, services and/or other assistance for the recreating public to safely and properly enjoy National Forest wilderness."

Another part of the WSC related to forest plan management direction is Element 5 – Protecting Opportunities for Solitude or Primitive and Unconfined Recreation. Managing to protect "outstanding opportunities for solitude or a primitive and unconfined type of recreation" has been perhaps the most controversial aspect of wilderness management to date. Controversy typically emerges if managers propose any type of restriction on visitor access or behavior, such as use limits, to improve opportunities for solitude. Factors contributing to this controversy include:

1. Lack of clarity over the meaning of solitude thus leading to lack of agreement over what the problem really is (e.g. visitors may view the concept holistically while managers may focus on the number of encounters in particular locations).
2. Perception that solitude is too subjective and individualistic for management.
3. Lack of standards or agreement on standards that define when there is a problem requiring corrective action.
4. Managing for solitude without equal consideration of managing for primitive and unconfined recreation opportunities.
5. The importance of access to visitors even when they support wilderness preservation.
6. Tension between providing outstanding opportunities for solitude vs. primitive and unconfined recreation.

### **Forest Service Manual Direction**

Forest Service Manual Chapter 2320 – Wilderness Management, has been reserved by the Washington Office. Management direction regarding the implementation of specific exemptions for wilderness management in the Regional Supplements to the Forest Service Manual, still remain in effect. The Forest Service Manual from the Washington Office is expected to be reissued sometime in the near future.

Forest Service Handbook (FSH) 2709.11, 41.53e - Needs Assessment, Resource Capacity Analysis, and Allocation of Use – Conduct a needs assessment to determine the public or agency need for authorized outfitting and guiding activities. When conducting a needs assessment for outfitting and guiding activities in a Wilderness Area, assess whether these activities are necessary for realizing the recreational or other wilderness purposes of the area and the extent to which the activities may be authorized consistent with maintaining the wilderness character of the area. Review previous needs assessments when reauthorizing use to ensure that they remain relevant to current and projected use trends, and update them if necessary.

### **Other FSM direction includes**

Under FSM 2340 – Privately Provided Recreation Opportunities

#### 2340.2 - Objectives

To provide, under special use authorization, sufficient, suitable facilities and services that supplement or complement those provided by the private sector, State, and local government on private land and

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the Forest Service on National Forest System land to meet public needs, as determined through land and resource management planning.

To facilitate the use, enjoyment, understanding, and appreciation of natural resource settings on the National Forest.

### **Forest Plan Direction for Wilderness**

#### Goals

To manage all designated Wilderness to maintain the enduring resource of Wilderness as directed by the Wilderness Act of 1964, subject to the special provisions and exceptions in the Alaska National Interest Lands Conservation Act of 1980 (ANILCA) and the Tongass Timber Reform Act of 1990 (TTRA).

Protect and perpetuate natural biophysical and ecological conditions and processes. Ensure Wilderness ecosystems are substantially free from the effects of civilization.

Provide a high degree of remoteness from the sights and sounds of humans, and opportunities for solitude and primitive recreation activities consistent with Wilderness preservation.

Keep Wilderness untrammled and free from human control or manipulation, including actions taken to manage Wilderness.

Protect the undeveloped character of Wilderness by following legislative guidelines regarding permanent improvements or human occupation, including mechanized transport and motorized equipment.

#### Objectives

Apply a multi-disciplinary focus to Wilderness management; consider stewardship of Wilderness in the annual program of work by all resources.

Manage recreation activities so that the levels of social encounters, on-site developments, methods of access, and visitor impacts indicated for the Primitive Recreation Opportunity Spectrum (ROS) Class are emphasized. Areas managed as Semi-Primitive within a Wilderness are an exception and are not encouraged.

Provide for public uses of Wilderness as authorized in the Wilderness Act, but subject to ANILCA provisions for motorized and non-motorized access and travel, including reasonable traditional subsistence use by rural residents, and provisions of other applicable Wilderness designation acts.

Maintain trails and primitive facilities that are in harmony with the natural environment and that promote primitive recreation opportunities. Feature facilities designed primarily to provide resource protection and encourage smaller group size and emphasize challenge and risk instead of convenience.

Maintain the Wilderness capacity to provide information on natural ecological processes.

Preserve and perpetuate biodiversity.

Inventory, reduce, and, when possible, eliminate non-native species in Wilderness.

Manage Wilderness as a place where self-reliance and primitive skills are needed and can be honed.

### **Stikine Area Outfitter and Guide Environmental Assessment**

In 1997, the ***Stikine Area Outfitter and Guide Environmental Assessment*** (EA) to develop a strategy to manage outfitter and guide special use permits was completed for both the Wrangell and Petersburg Ranger Districts. A Decision Notice was published in August 1997 describing the rationale for the selected alternative. The districts reviewed the EA in April of 2004. The review recommended a few minor changes (primarily to address new sites and roads) and determined that no further environmental analysis was required and that the 1997 Decision Notice would be extended until the next review (scheduled for 2009).

Included in the 1997 ***Stikine Area Outfitter and Guide Environmental Assessment*** is a Recreation Use Carrying Capacity Report, (CCR) developed to determine the maximum amount of use that could be accommodated in a given area without loss in the quality of the natural environment and/or the prescribed visitor experience (ROS). The CCR provides managers with a tool and rationale for apportionment of outfitter and guide use allocations. When possible, conservative use variables were used in calculations to take into account the more primitive experience that most visitors expect in Alaska.

The EA includes various Mitigation Measures that are used to address site specific concerns in the various study areas. The Mitigation Measures are included with all Outfitter and Guide Special Use Permits as Special Stipulations and therefore become part of the permit. Failure to adhere to the Special Stipulations would be a violation of the terms in the Special Use Authorization and could lead to the termination of the permit. The Special Stipulations that address areas of concern include:

1. Outfitter/Guides will submit revisions of their Operating Plans in writing.
2. Land ownership is mixed and it is the responsibility of the permit holder to determine ownership and obtain proper authorization for use of private, native, and/or local government-held lands.
3. Outfitter-guides will incorporate *Leave No Trace* skills into all activities on National Forest System lands (<http://www.lnt.org/index.php>).
4. Outfitter-guided use of public use recreation cabins or their amenities (e.g. skiffs, firewood, fire rings) is prohibited. Exceptions may occur as specifically approved for a site by the District Ranger. These exceptions must be identified in the permit or addressed in District Stipulations.
5. Within designated Wilderness, no more than 12 people (including guides) can occupy a site<sup>2</sup> at one time.
6. All campfires will be built below high tide, as mound fires (a LNT technique) or in fire pans.
7. Beach Meadows: Outfitter/guides will not establish camps, or allow their clients to camp in these areas. When walking through these areas, people should stay on existing paths and game trails to avoid trampling or damaging vegetation in beach meadows. Located at the margin between marine beaches and the forest fringe, beach meadows are characterized by the presence of tall grasses, beach pea, Indian paintbrush, Pacific silverweed, yarrow, chocolate lily, pretty shooting star, and Nootka lupine. These meadows often have between 20-40 different plant species, some of which are on the sensitive species list.
8. Impacts on Bald Eagle Nest Sites: The Forest Service and the U.S. Fish and Wildlife Service have a Memorandum of Understanding which establishes a minimum 330-

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<sup>2</sup> Site: an area on the National Forest occupied by persons that is not within sight and sound of other Forest users.

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foot radius "habitat management zone" around each bald eagle nest tree. Camping in this zone is prohibited to guided groups.

9. A copy of the permit must be with the operator at all times when operating on National Forest System lands.
10. Use Reports will reflect specific locations of use on National Forest System lands.
11. 36 CFR Ch.11 261.10 The following are prohibited: ...(d) Discharging a fire arm or any other implement capable of taking human life, causing injury, or damaging property: (1) in or within 150 yards of a residence, building, developed recreation site or occupied area, or (2) across or on a Forest development road or a body of water adjacent thereto, or in any manner or place whereby any person or property is exposed to injury or damage as a result in such discharge.

## Appendix 2. ROS classes for PCDSC Wilderness Area.

**Primitive**

<b>Setting indicators</b>	<b>Standards and Guidelines</b>
Scenic Quality	Not to exceed the High Scenic Integrity Objective. An Existing Scenic Integrity level of Very High is fully compatible and encouraged.
Access	Non-motorized cross-country travel and travel on non-motorized trails and on waterways is typical. Use of airplanes, helicopters, motorboats, off-highway vehicles, and snowmachines for traditional activities, subsistence, emergency search and rescue, and other authorized resource management activities may occur but is rare.
Remoteness	No or infrequent sights and sounds of human activity are present. Setting is located more than 1.5 hours walking or paddling distance, or 3 miles, from any human developments other than infrequently traveled marine travelways. Areas are generally greater than 5,000 acres, but may be smaller if contiguous with a Semi-Primitive class.
Visitor Management	On-site regimentation and controls are very rare. Signing is limited to directional information and safety. There are no on-site interpretive facilities. There is great opportunity for discovery on the part of the users.
On-site Recreation Development	Structures do not exceed Development Scale I, except for public recreation cabins, and are maintained for appropriate levels of use.
Social Encounters	User meets less than three parties per day during trip. No other parties are within sight or sound of dispersed campsites or cabins. Authorize a party size of no more than 12 persons for any one site or activity group for commercial recreation use. Exceptions to the commercial group's size should be rare. A group size of 12 persons or less is recommended for general public use. Refer to REC122 in Chapter 3 for exceptions.
Visitor Impacts	Visitor-caused impacts to resources are slight and usually not noticeable the following year. Site hardening is limited to boardwalk trails and necessary boat moorings or bear-proof food caches and rustic public recreation cabins.

**Semi-Primitive non-motorized**

<b>Setting indicators</b>	<b>Standards and Guidelines</b>
Scenic Quality	Not to exceed the High Scenic Integrity Objective. An Existing Scenic Integrity level of Very High is fully compatible and encouraged.
Access	Non-motorized cross-country travel and travel on non-motorized trails is typical. Use of airplanes, helicopters, motorboats, and snowmachines for traditional activities, subsistence, emergency search and rescue, and other authorized resource management activities may occur unless specifically restricted for safety and/or resource protection purposes. Use of off-highway vehicles may occur on designated routes in accordance with 36 CFR 212, 251, and 261 – Travel Management; Designated Routes and Areas for Motor Vehicle Use.
Remoteness	Nearby sights or sounds of human activity are rare, but distant sights or sounds may occur. Setting is located more than 0.5 hour walk or paddle, or approximately 0.5 mile (greater or less depending on terrain and vegetation, but no less than 0.25 mile) from 1) infrequently traveled waterways; 2) roads and trails open to motorized recreation use; and 3) clearcut harvest areas. Aircraft access is only occasional. Areas are generally greater than 2,500 acres, but may be smaller if contiguous with Primitive or Semi-Primitive Motorized classes.
Visitor Management	On-site regimentation and controls are rare. Visitor information facilities may be used to interpret cultural and natural resource features, but are not elaborate and harmonize with the setting.
On-site Recreation Development	Facilities and structures generally do not exceed Development Scale II and are maintained to accommodate the types and levels of use anticipated for the site. Forest Service recreation cabins are fully compatible.
Social Encounters	User meets less than 10 parties per day (6 parties per day in Wilderness) on trails and waterways during 80 percent of the primary use season. No other parties are within sight or sound of dispersed campsites during 80 percent of the primary use season. Maximum party size for commercial use within Wilderness is 12. Exceptions for larger party sizes within Wilderness should be rare. Refer to REC122 in Chapter 3 in the Forest Plan for exceptions. A party size of up to 20 people can be considered in Semi-Primitive settings outside of Wilderness. Outside of Wilderness, party sizes larger than 20 people may occur during less than 15 percent of the primary use season in limited locations as appropriate by LUD.
Visitor Impacts	Visitor-caused impacts to resources are rare and usually not long-lasting. Site hardening is limited to boardwalk trails, boat tramways, moorings and docks, bear-proof food cache facilities, and rustic public recreation cabins.

**Semi-Primitive motorized**

<b>Setting indicators</b>	<b>Standards and Guidelines</b>
Scenic Quality	Not to exceed the Moderate Scenic Integrity Objective. Existing Scenic Integrity levels ranging from Very High through High are fully compatible and encouraged.
Access	Travel on motorized and non-motorized trails and Traffic Service Level D roads, although some Traffic Service Level C roads provide access to and through the area. Use by high-clearance vehicles and motorized water travel is common. Road density is less than 1 mile per square mile. Off-road snowmachine travel on snow may occur.
Remoteness	Nearby sights or sounds of human activity are rare, but distant sights or sounds may occur. Setting is located within 0.5 hour walk or paddle or within 0.5 mile (greater or less depending on terrain and vegetation, but no less than 0.25 mile) of infrequently traveled waterways or small aircraft access points and/or roads that are open and maintained for passage by high-clearance and four-wheel drive vehicles (Maintenance Level 2), and provide access to recreation opportunities and facilities. Areas are generally greater than 2,500 acres, but may be smaller if contiguous with Primitive or Semi-Primitive Non-Motorized classes.
Visitor Management	On-site regimentation and controls are few. Control facilities consist primarily of informational signs and site-specific road closures. Visitor information facilities may be used to interpret cultural and natural resource features, but are not elaborate and harmonize with the setting.
On-site Recreation Development	Facilities and structures generally do not exceed Development Scale II and are maintained to accommodate the types and levels of use anticipated for the site and area. Forest Service recreation cabins are fully compatible.
Social Encounters	User meets less than 10 parties per day (6 parties per day in Wilderness) on trails, roads, and shorelines during 80 percent of the primary use season. During 80 percent of the primary use season, no other parties are visible from campsites. Maximum party size for commercial uses in Wilderness is 12 people. Exceptions should be rare. Refer to REC122 in Chapter 3 in the Forest Plan for exceptions. A party size of up to 20 people can be considered in Semi-Primitive settings outside of Wilderness. Outside of Wilderness, party sizes larger than 20 people may occur during less than 15 percent of the primary use season in limited locations.
Visitor Impacts	Visitor-caused impacts may be noticeable, but not degrading to basic resource elements. Site hardening is very infrequent, but, when it occurs, is in harmony with, and appropriate for, the natural-appearing backcountry setting.

**Commercial Services Needs Assessment in the Tebenkof Bay and Kuiu  
Wildernesses  
Petersburg Ranger District  
Tongass National Forest**

Prepared by: Brad Hunter, Kathy Rodriguez, Russ Beers

Date: November 2009

**EXECUTIVE SUMMARY**

The Petersburg Ranger District, Tongass National Forest, developed the Commercial Services Needs Assessment in the Tebenkof Bay and Kuiu Wildernesses (Needs Assessment) to determine the type, extent, and location of outfitter/guide use that could take place in the Tebenkof Bay and Kuiu Wilderness Areas. Needs assessments are used to determine if there is a 'need' for private enterprise to assist the agency in providing access, services and/or other assistance for the recreating public to safely and properly enjoy National Forest Wilderness Areas, and if so, the extent necessary. This document is tiered to the Tongass Forest Plan as amended in February 2008 and the *Determination of Need for Commercial Services within Wilderness Areas on the Tongass National Forest* (USDA Forest Service 2007).

These two Wilderness Areas extend from Point Ellis on Kuiu Island south to Port Malmesbury and east to Port Beauclerc. The Tebenkof Bay Wilderness Area was designated by Congress in 1980 through the Alaska National Interest Lands Conservation Act of 1980 (ANILCA). The Kuiu Wilderness Area was designated by Congress in 1990 through the Tongass Timber Reform Act which amended ANILCA. The area is very remote making it difficult to access which can make it expensive and/or hazardous to reach. Both Wilderness Areas can provide exceptional opportunities for solitude. They are highly untrammeled; the area largely operates without human management or manipulation.

As managers, the Forest Service will strive to maintain a natural environment and a balance of uses by authorizing permitted operators to conduct suitable activities in a Wilderness setting while providing all visitors an opportunity for a solitude. The Forest Service will continue monitoring to ensure that the balance is properly maintained.

A commercial services needs assessment for backpacking/camping, hunting, freshwater fishing and remote setting nature tours (RSNT) is as follows:

**Camping:** Of the permitted activities in these Wilderness Areas to date; camping has had the highest amount of use over the years (Table 1). Camping by those not well versed in *Leave No Trace* principles can cause unnecessary impact to an area. By practicing and teaching low impact techniques for camping, professional guides are helping to ensure that the wilderness integrity of the area is maintained. Use by the guided sector is much easier to track, monitor and regulate and can be used as a tool to have groups camp in locations that are best for the resources. Care must be taken to ensure that the current levels of solitude are maintained or improved. Camping use is appropriate if done in a low impact manner.

**Commercially guided camping *will* be authorized in the Tebenkof Bay and Kuiu Wilderness Areas through this needs assessment .**

**Hunting:** There has been concern expressed by hunters and guides that overcrowding is occurring on the Tongass for bear hunting. The overcrowding concern has been expressed between hunters and other visitors, as well as between hunters. This concern has been expressed for Kuiu Island because of its renowned high black bear densities.

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.

**Commercially guided hunting in the Tebenkof Bay and Kuiu Wilderness Areas at current levels will be authorized through this needs assessment. Allocations within Wilderness for commercial services have been limited to 10 percent of the carrying capacity in previous recreation use carrying capacities. In order to protect the wilderness hunting experience, it is recommended to maintain this limitation, and to look for additional ways to respond to guides and hunters concerns regarding loss of solitude.**

**Freshwater fishing:** Very little guided freshwater fishing takes place within these two Wilderness Areas. The primary location for fishing is at Aleck's Creek. The use has ranged from 20 RVDs in 2000, to 2 RVDs in 2005 (Table 1). Guides are used to accessing this remote area, both for transport to the area and for route finding in areas without trails.

**Commercially guided freshwater fishing in the Tebenkof Bay and Kuiu Wilderness Areas will be authorized through this needs assessment.**

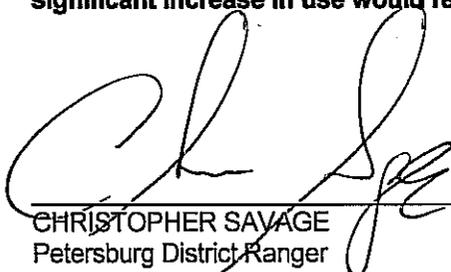
**Remote Setting Nature Tours (RSNT):** Visitors in this category access the area via watercraft or floatplane. Activities such as wildlife viewing, sightseeing, picnicking, birding, photography, hiking, nature viewing, etc. are included in this category.

Having the knowledge, skills, experience, and equipment, even in good weather, to navigate the waters of Chatham and Sumner Straits, or to fly into the area lakes, are things the average visitor would not have. For most of the population, outfitters and guides provide the only means by which they could access/experience the area. Through interpretation of the area's natural and cultural history, guides can increase their clients' appreciation of the Wilderness Area.

Large cruise ships do not currently stop at communities near these Wilderness Areas. Smaller cruise ships have the potential to bring a larger numbers of visitors into the Wilderness, which could bring substantial negative change to the wilderness character. Even a small increase in visitation would be a proportionally significant change when considering the extent to which use is occurring now. RSNT opportunities for larger groups exist at many places outside these two Wildernesses.

Both Wilderness Areas have a niche of providing outstanding opportunities for solitude, as well as primitive and unconfined recreation. These opportunities are becoming harder to find on the Tongass as the tourism industry grows.

**Commercially guided RSNT in the Tebenkof Bay and Kuiu Wilderness Areas will be authorized through this needs assessment where the standards for a Primitive ROS experience can be met<sup>1</sup>; an activity group size will not exceed 12 people; exceptions will be rare. While some increase in this use can be anticipated, new operators proposing a significant increase in use would require additional analysis prior to approval.**

  
CHRISTOPHER SAVAGE  
Petersburg District Ranger

11/27/09  
Date

<sup>1</sup> Tongass National Forest Land and Resource Mgmt. Plan, Wilderness Management Prescriptions, Recreation and Tourism.

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## I. Introduction

The Petersburg Ranger District, Tongass National Forest, developed this needs assessment to determine the type, extent, and location of outfitter/guide use that could take place in the Tebenkof Bay and Kuiu Wilderness Areas. A needs assessment is a means to determine if there is a 'need' for commercial enterprise to assist the agency in providing access, services and/or other assistance for the recreating public to safely and properly enjoy National Forest Wilderness Areas, and if so, the extent necessary. This document is tiered to the Tongass Forest Plan as amended in February 2008 and the *Determination of Need for Commercial Services within Wilderness Areas on the Tongass National Forest* (USDA Forest Service 2007).

The Tebenkof Bay Wilderness and the Kuiu Wilderness are both analyzed in this analysis. Tebenkof Bay Wilderness was designated by the Alaska National Interest Lands Conservation Act (ANILCA) in 1980, and the Kuiu Wilderness was designated through an amendment to ANILCA by the Tongass Timber Reform Act in 1990. The two Wilderness Areas are on the same island, share an adjacent boundary, have similar biophysical characteristics and public recreational uses. For these reasons the Forest Service often manages these two Wilderness Areas in a similar manner and it was deemed appropriate and efficient to combine them for this document.

The following commercial activities that were identified in the Tongass National Forest Needs Assessment and currently take place in these two Wilderness Areas include:

- guided kayaking and camping;
- freshwater fishing;
- big game (black bear/deer/wolf) hunting; and
- remote setting nature tours (RSNT).

### Assumptions

The following are assumptions made to aid in the assessment of the need for outfitter/guide operations:

- Visitor use is expected to remain at current levels or continue to increase (TLRMP Amendment Record of Decision 2008). There may also be shifts in use patterns (timing and location) and user types (hikers, backpackers, day users, etc.). However, with the current economic downturn, it is hard to predict if this will remain true for the next 2-5 years.
- Some people would not visit the Wilderness without an outfitter or guide because they lack the skills, knowledge, equipment, or ability to do so on their own.
- Conflicts between outfitter/guide operations and the non-outfitted/guided public have the potential to increase as overall use increases.
- Activities proposed by guides are wilderness dependent and appropriate to a wilderness setting.

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## II. Wilderness Management Direction

See Appendix 1. Wilderness Management Direction.

### **Goals and Objectives for Wilderness**

Manage designated Wilderness to maintain an enduring wilderness resource while providing for the public purposes of recreational, scenic, scientific, educational, conservation, and historical use, as provided in the Wilderness Act of 1964 and ANILCA.

- Manage Wilderness as a place where self-reliance and primitive skills are needed and can be honed by the public.
- Provide for public use of the Wilderness in accordance with ANILCA provisions for motorized and nonmotorized access and travel, including reasonable access to traditional subsistence resources.
- Provide trails and primitive facilities that are in harmony with the natural environment and that promote primitive recreation opportunities. Feature facilities designed primarily to provide resource protection and encourage smaller group size. Facilities and trails tend to allow for challenge and risk instead of convenience.
- Maintain the Wilderness to provide information on natural ecological processes.
- Preserve and perpetuate biodiversity. Inventory and reduce or eliminate invasive species in Wilderness.

### III. Visitor Use and Commercial Use

#### Historical Use of the Wilderness Areas by Outfitters and Guides

Permitted use over the past few years has included camping, big game outfitting, fishing, and sightseeing. Use has varied (Table 1) from 13 permit holders using 561 recreational visitor days (RVDs)<sup>2</sup> in 2002, to 10 operators with 220 RVDs in 2007, with the highest total RVDs being 610 in 2006.

**Table 1. RVDs used by outfitters/guides from 2002 through 2007**

Activity	2002	2003	2004	2005	2006	2007
Camping*	510	213	471	397	575	183
Fishing	20	19	7	2	6	6
RSNT**	10	5	14	9	0	3
Black bear or wolf hunting	21	15	3	16	29	28
Total	561	252	495	424	610	220

\*The camping is from guided sea kayak groups.

\*\*RSNT – remote setting nature tours, includes sightseeing, hiking, wildlife viewing, etc. at remote sites (not accessed by road system).

#### Niche and Description

##### TEBENKOF BAY

Tebenkof Bay Wilderness is on central Kuiu Island, north of the Kuiu Wilderness. The area is a complex system of bays, islets and coves that first attracted the Tlingit Indians to the bay long ago. Even the most remote beaches in the bay have had a human presence in the past. The land offered hunting, trapping, camping and gardening, and the water was rich with a variety of shellfish and saltwater and freshwater fish. In the mid-1900's, fox farm operations were abundant on the small islands, and today commercial fishing is an important way of life. Most of the time it is a serene place where the only sound in the distance is the call of a young sea otter or the blow of a humpback whale.

The area's main attractions are its: remoteness and solitude, protected waters in relation to the surrounding unprotected waters of lower Chatham Strait and the Pacific Ocean, terrestrial and marine wildlife, and subsistence value for the community of Kake.

<sup>2</sup> One RVD is equal to 12 hours of recreation use in one day, so 12 people recreating for 1 hour is = one RVD, as is one person recreating for 12 hours.

## KUIU

Kuiu Wilderness is on the south-central portion of Kuiu Island which is contained by two large bodies of water: Sumner Strait to the east and Chatham Strait to the west. The Tlingit Indians braved these waters and sought protection in the deep bays that now make up the Kuiu Wilderness. The remoteness of this Wilderness, coupled with the challenge and risk of travel by water or land, offers outstanding opportunities for solitude. Kuiu Island has a high density of black bears, and visitors are more likely to encounter this wild creature than a human.

### Existing Condition

One way existing condition can be assessed is to divide wilderness character into the four components from the Wilderness Act of untrammeled, natural, undeveloped, and opportunities for solitude and primitive and unconfined recreation:

- ❖ Untrammeled. This quality describes the degree to which management actions “hinder” or “control” the land and natural processes. For example, the Wilderness Area has remained free of management activities that have altered natural systems, such as dams or regulations that govern visitor activities. There has been some logging in the past which is difficult for the untrained eye to identify due to the amount of natural regeneration that has occurred. The Tebenkof Bay Wilderness has a total of approximately 442 acres that have been either clear cut or partially logged; dating from 1918 to 1966 (less than 1% of the Wilderness). The Kuiu Wilderness has approximately 950 acres that have been previously harvested, with the majority taking place between 1915 and 1948, and 20 acres in 1986 (1.6% of the Wilderness).
- ❖ Natural. This quality describes the ecological effects of management actions that manipulate vegetation, soils, air quality, or other physical and biological components of wilderness. Wildlife found within the area includes black bear, Sitka black-tailed deer, and wolf. Kuiu Island has some of the highest black bear population densities in North America. Local hunters and guides are concerned about black bear population number declines (Peacock 2003). The island also has two subspecies of American marten (Small, et al. 2002). Moose exist in the area, but in relatively small numbers. The list of smaller fur bearing animals common to the area includes beaver, mink, pine marten, land otter, and weasel. It is common to see humpback whales and sea otters in adjacent saltwater areas, as well as numerous sea birds. Annual surveys for native and non-native plants began in 1997. Due to the remoteness from human developments these two Wilderness Areas have relatively intact native plant communities. Small populations of non-native plants are primarily located at previously disturbed sites, such as fur farms and fish processing sites. The nearest roads are located to the northeast of Alecks Lake in the Three Mile Arm area. The areas that had trees harvested have grown back to where they are not readily apparent and have a minimal impact on the visual qualities.
- ❖ Undeveloped. This quality describes the effects of structures, habitations, or other evidence of human presence or occupation. There are no public recreation cabins within these two Wilderness Areas. There is one special use residence in the Tebenkof Bay Wilderness, which historically was a fox farm. The main cabin burned down in 2005 but there is still a barn and several smaller buildings. The permit holder currently retains the right to replace the old cabin. There is one primitive 1.5 mile long trail that crosses both Wilderness Areas between Petrof Bay and Affleck Canal. Saltwater access by floatplanes, motorboats, or kayaks, can be challenging and expensive due to the long distance that must be traveled from the nearest communities. Chatham Strait also poses challenging water conditions for boats and planes. Floatplanes can land on Aleck’s Lake and Malmesbury Lake. Except for access afforded from saltwater and lakes, the area is relatively inaccessible and undisturbed by the activities of people. The eastern portion of the Kuiu Wilderness (Port Beauclerc) is accessed from more protected waters (Sumner Strait) than the southern (Affleck Canal) and western side of the Wilderness Area (Port

Malmesbury). The water access to Tebenkof Bay is only from Chatham Strait, which is known for rough water conditions. The remoteness and challenge of accessing these areas has minimized human use. The majority of the guided use in the Wilderness is from sea kayaking permit holders who camp overnight on the uplands. In general, the expectation is there will be less evidence of human occupation as one travels farther in from the shoreline.

- ❖ Opportunities for solitude or primitive and unconfined recreation. Visitors to the upland areas of the Wilderness Areas can expect a moderate-to-high probability of experiencing isolation from most sights and sounds of humans. The visitor may see or hear boats on the saltwater. Sometimes there are commercial fishery openings that bring several fishing boats to a bay, primarily trollers, seiners, or long liners. A saltwater fishing charter operation is based in Bay of Pillars, which sends boats to the mouth of Tebenkof Bay daily during the summer months. There are also occasional overflights of low flying aircraft. In 2008 during a total of 15 days of field surveys by wilderness rangers during the months of June and July four aircraft were sighted and 44 were heard. Twenty-eight boats were sighted; 21 of which were commercial trollers mostly around the mouths of Tebenkof Bay and Port Malmesbury. The majority of these aircraft and boats were rated as low impact on solitude (67 low, six medium, and three high). The only maintained access route into the uplands is the 1.5 mile Affleck Trail, which is a primitive trail with no structural trail components. Shoreline areas are accessed by boat or floatplane giving the chance for wilderness visitors to encounter other users.

Subsistence is an important activity for some people, most of whom travel from Kake. The sockeye salmon at the mouth of Alecks Creek in Tebenkof Bay is a traditional fishery in July. Residents from Port Alexander and Point Baker also use the two Wilderness Areas for deer hunting and trapping.

Within 30 days of the end of the operating season, the permit holders submit an Actual Use Report that lists the locations (latitude and longitude), type of use, the number of clients, and length of stay at each location. From this information, we determine the number of RVDs (Table 2) utilized at each location, by each group. This provides a mechanism to monitor the amount of use at each location. That information is then used to help determine the areas that get field checked.

**Table 2. Number of outfitters/guides operating in these Wildernesses by year.**

Year	Number of Outfitters and Guides
2002	13
2003	10
2004	7
2005	11
2006	9
2007	10

### Desired Condition

The Wilderness Act of 1964 directs “each agency administering any area designated as Wilderness shall be responsible for preserving the wilderness character of the area.” Section 2(c) of the Act defines four qualities of wilderness that managers try to preserve.

As described in the 2008 Amended Forest Plan,

All designated Wilderness on the Tongass National Forest is characterized by extensive, unmodified natural environments. Ecological processes and natural conditions are not measurably affected by past or current human uses or activities. Users have the opportunity to experience independence, closeness to nature, solitude, and remoteness, and may pursue activities requiring

self-reliance, challenge, and risk. Motorized and mechanized use is limited to the minimum needed for the administration of the Wilderness. Allow for access to state and private lands, subsistence uses, and public access and other uses to the extent provided for by ANILCA.

- **Untrammled** – *The Wilderness is essentially unhindered and free from modern human control or manipulation.*  
The desired condition is an improving or stable trend in actions that control or manipulate the Wilderness. These actions include ones that manipulate plants, animals, pathogens, soil, water, or fire, whether authorized or unauthorized by the Forest Service.
- **Natural** – *Wilderness ecological and evolutionary systems are substantially free from the effects of modern civilization.*  
The desired condition is for the trend of the effect of modern civilization on plant, animal, pathogen, physical, and biophysical resources to be stable or decreasing.
- **Undeveloped** – *Wilderness retains its primeval character and influence and has minimal evidence of modern human occupation or modification.*  
The trends in recreational and non-recreational developments, use of motor equipment and transport, and loss of statutorily protected cultural resources is stable or decreasing.
- **Outstanding opportunities for solitude or a primitive and unconfined type of recreation** – *Wilderness provides outstanding opportunities for people to experience natural sights and sounds, solitude, freedom, risk, and the physical and emotional challenges of self-discovery and self-reliance.*  
The trend is stable or improving for: remoteness from sights and sounds of people inside and outside Wilderness; number of facilities that decrease self-reliant recreation; number of trails and level of trail classes; and amount of management restrictions on visitor behavior.

### Recreation Opportunity Spectrum (ROS) and Visitor Use Capacity in the Tebenkof Bay and Kuiu Wilderness Areas

ROS is a system for inventorying recreation experience opportunities into seven classes as identified in the Tongass Land Management Plan. Each class is defined in terms of the degree certain recreation opportunities are possible based on the extent the natural environment has been modified, types of facilities provided, the number of interactions expected with other groups of people, and the relative density of recreation use.

The Tebenkof Bay/Kuiu Wilderness study area is all managed for the Primitive ROS class. ROS standards and guidelines are considered when looking at the need for guided services (Appendix 2, description of this ROS class). The Forest Plan directs us to manage wilderness recreation activities to meet appropriate levels of social encounters, on-site development, methods of access, and visitor impacts indicated for the Primitive ROS class.

Visitor use capacity is the approximate number of people that can visit a portion of the National Forest while having the prescribed recreation (ROS) experience. The reason to determine capacity is twofold; to ensure that visitors can enjoy recreational experiences that meet their expectations and ensure the wilderness resource can sustain the potential level of use. Knowledge of existing use, projections of future demand, capability of an area to withstand impact, and useable terrain can be analyzed to determine capacity. For example, an area accessed by foot with multiple valleys to hunt would have a greater ability to accommodate a higher capacity of users than a small alpine lake, accessed seasonally by float plane, with one flat site for camping. There are several aspects in determining capacity, including social, biophysical, managerial, and facility capacity:

- **Social.** This refers to the sights and sounds of other people, which may impact the group's experience:
  - *Is this an area heavily used by residents?*
  - *Can people spread out over the area with little chance of encounters?*
  - *How long is the useable season?*
  - *Are there other types of recreation use that are not compatible with the proposed use?*
  - *Are there periods of high use that can be identified? (Salmon runs, commercial fishing openings, etc...).*
- **Biophysical.** This refers to the biological resources found in the area potentially impacted by visitors. Biophysical attributes influence whether a setting is capable of providing a particular recreation opportunity without degrading an area's ecological processes, structure, composition, resilience, integrity, potential, as well as the setting's ability to restore itself and provide for other resource uses and values:
  - *Are there plants or wildlife concerns?*
  - *Are campsites and travel routes located on durable surfaces?*
  - *Are user-created trails causing erosion or other unacceptable impacts?*
- **Facility.** This refers to physical attributes of the area that make it useable by visitors:
  - *How many campsites are available?*
  - *Are there adequate locations for camps that are on durable surfaces and out of site and sound?*
  - *Are there adequate anchorages in the saltwater?*
  - *Is access by foot, water, or plane easy or difficult?*
- **Managerial.** This refers to policies, management objectives, or rules that can increase or decrease visitor capacity in an area.

Once a need is determined, the capacity of the area is estimated to accommodate the activity by evaluating terrain, screening, campsite availability, and other factors. See the 2009 Recreation Use Carrying Capacity Report for Petersburg Ranger District.

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## IV. Special Knowledge and Skills Needed for Activities in the Tebenkof Bay and Kuiu Wilderness Areas

### Potential Categories of Public Need<sup>3</sup> for Commercial Services

Guides can serve as important partners for the Forest Service. In particular, guides can provide wilderness awareness, wilderness ethics education, and *Leave No Trace* education. Resource protection activities, such as reporting of invasive plants and illegal activities have been helpful in the past and could help the Wilderness Areas achieve a higher level of wilderness character. Guides can help build constituency and support for Wilderness among those groups of people who might not be exposed through typical outreach (for example, big game hunters).

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- <sup>3</sup> A desire for commercial services or the fact that the presence of a guide could enhance a visitor's experience should not be confused with "need."

The following are potential categories of public need for commercial services within the Tebenkof Bay and Kuiu Wilderness Areas:

- People with physical limitations;
- People pursuing activities where knowledge, equipment, and skill needed makes unguided use extremely difficult if not impossible;
- People wanting to take trips that focus extensively on Wilderness; or
- Wilderness stewardship activities that could be enhanced by outfitter/guides.

## Process for Determination of Public Need

“Public need” is a need determined to be essential for the well being of the entire public, guided and unguided, or to meet the intent of the Forest’s mission to manage and protect resources, provide for public safety, and to provide high quality recreation services. Within Wilderness the intended use should be dependent on the wilderness resource. **A guide wanting a permit does not always mean there is a public need.**

The principle of wilderness dependency is used to guide visitor management toward preventing overuse. It calls for favoring activities most dependent on wilderness conditions. Defining an activity as “wilderness dependent” can be difficult. Often it is not the activity itself that is dependent, but the particular style in which it is pursued. Hunting or kayak camping in remote locations with little or no human interaction and with more primitive techniques, are good examples of activities with a wilderness dependent style.

Evaluation Criteria used for determining the need for outfitter assistance in the management of the Wilderness Area:

Wilderness Dependency. The extent to which the proposed service can be offered on private or non-wilderness national forest lands. Some examples of these services could be:

- a. Trips in which solitude and unconfined, primitive recreation are the central components of the experience.
- b. Visits to ecosystems, geological, or physical resources found in Wilderness for recreational, scientific, or educational purposes.

Forest-wide Availability. Does this activity occur elsewhere in other Wildernesses on the Tongass? For example, if an activity occurs in abundance in other areas, there may not be a need to accommodate it in these Wilderness Areas.

Wilderness Character. Will outfitter/guide activities preserve or improve the four qualities of wilderness character? Alternatively will outfitter/guide activities degrade wilderness character? For example will the natural quality or the primitive recreation quality be impacted by an increase in bear hunting guides? Will the solitude or primitive and unconfined recreation quality be affected by increasing use from small tour ships? Will the natural quality or primitive recreation be improved by outfitter/guides that are well trained in *Leave No Trace* education?

Skills and Equipment. Outfitter/guide skills and equipment are needed by a portion of the public because of one or more of the following:

- a. Specific skills required for activities appropriate for the area require substantial time and/or talent to learn.
- b. Learning necessary skills and participating in the activity requires acquisition and consistent use of expensive, specialized equipment for which the public could not, or normally would not, expend the dollars or time.

- c. The skills required are so unique that the use of a guide is almost a prerequisite if the public is to have any opportunity to participate in and enjoy the activity.

Knowledge. Guide knowledge of the wilderness resource and the activity area is needed by the public, and especially nonresidents, in order to enjoy recreational opportunities in a manner that reduces resource damage and user conflicts. This includes knowing where and by what method to best access and travel through an area.

Safety. An outfitter/guide's special skills and equipment are needed for a reasonable level of safety for the participants. Without guide assistance, members of the public could seriously endanger their health or lives, or would not visit the Wilderness due to safety concerns. These criteria are not meant to diminish the wilderness values of self-reliance or the opportunity to challenge oneself or experience a degree of risk.

Special Management Objectives and/or Issues. Outfitter/guide assistance is needed to insure special management objectives are met and/or issues resolved. Examples could include recreational opportunities for disabled populations, instilling a wilderness ethic in clients, contribution to rural area development and economy of formerly commodity based areas, and assistance in reducing critical resource impacts and/or conflicts between users. Another example is when a guide is required by the State of Alaska for participating in a mountain goat or brown bear hunt. Since neither of these species inhabits Kuiu Island, this is not a consideration for this Wilderness.

Extent Existing Outfitter/Guide Permits are Being Utilized. Are current outfitted or guided assignments booked or over-booked, indicating a larger interest in the service?

Level of Use and Conflict. Conflicts between all types of users, private and commercial in the Wilderness. The extent to which already authorized use days or capacity exists for existing permit holders to fill the need. What is the compatibility of commercial, institutional, and general public use, and the amount of use and social capacity within a given area of the Wilderness? Are use patterns (congestion and number of encounters) a potential problem? Is there a temporal congestion pattern - weekend use versus weekday use, day versus overnight use? Over time, what is the general trend? Is the projected future condition compatible with desired future condition?

Land Capability and Resource Concerns. Can the guide contribute to the protection of the land through his/her educational emphasis? What is the level of interference an outfitter/guide operation will have with the natural biological and physical processes of the Wilderness? Can a guide contribute to minimizing impacts from camping by applying *Leave No Trace* skills in choosing beach campsites that are durable, yet also safe for overnight use? Can the guide help in minimizing campfire resource damage by teaching best practice methods of building fires?

Public purpose. The Wilderness Act section 4(b) specifies "Wilderness Areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use." Guide services must help fulfill these purposes of Wilderness. Does this activity contribute to the public purposes established for this Wilderness? When considering the extent necessary, can people reasonably participate in this activity without a guide or is having a guide a prerequisite? Does this activity serve a broad segment of the population or is it limited to a select few? The Wilderness Act Section 4(c) prohibits commercial services but then allows some use as necessary to realize the recreational and wilderness purposes in Section 4(d.)

Type of Activity and Criteria	Rating Summary
<p><b><u>Camping from guided sea kayakers</u></b></p> <p>Wilderness dependency</p> <p>Forest-wide availability</p> <p>Wilderness character</p> <p>Skills and equipment</p> <p>Knowledge</p> <p>Safety risk</p> <p>Special objectives</p> <p>Demand/utilization</p> <p>Level of use and conflict</p> <p>Land capability</p> <p>Public purpose</p>	<p>Low</p> <p>High</p> <p>Low impact with LNT, high impact with poor LNT skills</p> <p>Moderate. Moderate cost for equipment</p> <p>Moderate</p> <p>High for outside waters, moderate inside bays</p> <p>High for extended length trips (<i>Leave No Trace</i> skills)</p> <p>Low</p> <p>Moderate</p> <p>Moderate, depending on location and amount of durable surface</p> <p>Moderate: only a select group will participate (recreation and scenic purposes)</p>
<p><b><u>Fishing/day hiking (freshwater - foot travel)</u></b></p> <p>Wilderness dependency</p> <p>Forest-wide availability</p> <p>Wilderness character</p> <p>Skills and equipment</p> <p>Knowledge</p> <p>Safety risk</p> <p>Special objectives</p> <p>Demand/utilization</p> <p>Level of use and conflict</p> <p>Land capability</p> <p>Public purpose</p>	<p>Low; other streams available</p> <p>High</p> <p>Low impact with a small number of people with LNT skills</p> <p>Moderate to low. Moderate cost for equipment</p> <p>Moderate</p> <p>Low to moderate</p> <p>Low</p> <p>Being met</p> <p>Low</p> <p>Moderate, depending on location</p> <p>High – recreation and scenic</p>
<p><b><u>RSNT (fly-in)</u></b></p> <p>Wilderness dependency</p> <p>Forest-wide availability</p> <p>Wilderness character</p> <p>Skills and equipment</p> <p>Knowledge</p> <p>Safety risk</p> <p>Special objectives</p> <p>Demand/utilization</p> <p>Level of use and conflict</p> <p>Land capability</p> <p>Public purpose</p>	<p>Low; other lakes/streams available</p> <p>High</p> <p>Moderate – increased floatplane noise</p> <p>Moderate skill due to remoteness. Moderate cost for flying</p> <p>Moderate to low, depending on location</p> <p>Moderate (bears, weather)</p> <p>Low</p> <p>Low</p> <p>Low</p> <p>Moderate</p> <p>Moderate – only select group can afford</p>
<p><b><u>Big game hunting</u></b></p> <p>Wilderness dependency</p> <p>Forest-wide availability</p> <p>Wilderness character</p> <p>Skills and equipment</p>	<p>Low; other areas available</p> <p>High</p> <p>Low impact with LNT</p> <p>High skill required – high cost/equipment</p>

Type of Activity and Criteria	Rating Summary
Knowledge	High to moderate
Safety risk	High
Special objectives	High
Demand/utilization	High
Level of use and conflict	Moderate
Land capability	Low for camping – there are few LNT camp sites near good bear habitat; moderate for boat based
Public purpose	Moderate – only select group can afford/participate

## V. Need for and Extent of Commercial Use in the Tebenkof Bay and Kuiu Wilderness Areas.

Camping.

Wilderness dependency.

- a. **National Forest System (NFS) land.** Tebenkof Bay and Kuiu are Wilderness areas that are not near the larger communities in SE Alaska. Use of this Wilderness for recreation is from those who choose this as a destination because of its remoteness and opportunities for solitude. The primary mode of transport from much of the guided and non-guided users is by kayak and smaller boats and the shorelines of these Wilderness Areas are the locations where overnight camping must take place. The solitude experience available in this Wilderness is dependent upon the low use the area receives.
- b. **Non-NFS.** There are very few opportunities for camping in the immediate vicinity on private or state lands.

Forest-wide availability. This type of use occurs in multiple areas on the Tongass.

Wilderness character. With small groups in durable locations, and with solid LNT practices, impacts to the wilderness character can be low. In addition to providing protection to resources from using proper camping techniques, guides knowledgeable about invasive plant species have provided the Forest Service with plant information for the Wilderness which improves our ability to manage wilderness resources.

Skills and equipment. Camping in a manner that leaves little or no impacts is a learned skill that many visitors and locals have little experience with in this wet and sensitive ecosystem. Equipment can be purchased at most outdoor stores with the expense depending upon the quality. There are local businesses that rent out or sell equipment to travelers, and maps are available to purchase at various locations (sporting good stores, FS offices, etc) and aerial photos are available on the internet.

Knowledge. Recreationists access these two Wilderness Areas by motor boat, kayak, or float plane, all of which take certain technical skills and an understanding of weather and water conditions in southeast Alaska. Some of the public do access the area with their own motor boats or sea kayaks, but the majority depends upon guides to provide knowledge of the local conditions for safe passage. The only trail located in the study area is the Affleck Portage Trail; otherwise foot access is by off-trail hiking. Good maps and compass skills are essential; a GPS and aerial photos will be help. A guide can enhance visitor knowledge and ensure that clients don't get lost and take safe and durable paths to destinations. Guides can also help minimize visitor impacts by showing where it is best to concentrate or to disperse impacts

depending upon the amount of expected cumulative recreation use and upon the sensitivity of the biological resource.

Safety risk. Hazards that might be encountered while accessing the Wilderness include the exposed seas of lower Chatham Strait while accessing the Wilderness, or the steep terrain, wildlife, or the cold wet climate. The presence of a guide can contribute to a feeling of safety. A portion of prospective wilderness visitors will probably not visit the area on their own because of concerns for their safety.

Special objectives. Guides are required to impart wilderness camping ethics to their clients, such as *Leave No Trace*. In particular, a guide might encourage clients to spread out in alpine and muskeg areas rather than walk single file, and will eliminate the use of flagging or rock cairns. Current problems at campsites in nearly all Wilderness Areas include the improper location of campsites and inappropriate use of campfires. A skilled guide can teach clients proper use of fires, such as using the mound, firepan, or durable beach methods.

Demand/utilization. In the past few years, there has been up to three permit holders in the study area for this type of activity. There have been one or two other expressions of interest for camping. In 2009 there is only one operator planning to use the area. It appears the cost of traveling to this remote Wilderness coupled with recent trends in the economy has negatively impacted the current demand.

Level of use and conflict. The existing permit holder conducts four 30-day long trips with groups of twelve. A portion of those trips occur in the Wilderness, varying from two to eight days.

Land capability. Current resource concerns from camping include use of non-durable sites, litter, fire rings in inappropriate places, constructing "campsite furniture", and development of social trails. The majority of the impacts have been caused by the unguided public and not the clients of the permit holders, but the two user groups often use the same sites, although the permittee uses solid LNT practices with few impacts. These impacts have been documented by doing Level III campsite monitoring in the spring after unguided bear hunting use, and again in late August after the guided kayaking/camping. The guides that use Tebenkof Bay have made earnest efforts to improve on *Leave No Trace* skills by attending training and this has resulted in significant improvements. The decreasing trend of impacts from the permitted camping has been documented in campsite monitoring performed by wilderness rangers and the permit administrator.

Public purpose. This activity contributes to the public purpose of recreation. It allows visitors to experience a remote Wilderness. There are outstanding opportunities for solitude that might not be experienced, otherwise.

## Hunting.

### Wilderness dependency.

- a. **National Forest System (NFS) land.** Opportunities exist outside of the wilderness area for hunting. Approximately two thirds of the Tongass National Forest is not designated Wilderness. Most of the non-Wilderness lands in SE AK are open for hunting.
- b. **Non-NFS.** There are fewer opportunities for hunting in the vicinity on private or state lands. The majority of SE AK is National Forest system lands, and the opportunity for hunting is proportionate.

## Appendix B

Forest-wide availability. Hunting is offered in other wilderness areas on the Tongass, and across most of land use designations of the Tongass.

Wilderness character. ADF&G sets harvest levels. Most clients and guides live on a boat and spend very little time in the upland areas of the wilderness during a typical day hunt. Guided hunting should have little effect on wilderness character. An exception would be if the amount of hunters begins to have an effect on their solitude. Any camping would need to adhere to *Leave No Trace* standards to avoid campsite and campfire impacts.

Skills and equipment. Hunters need to have the skill to identify and stalk, in a dynamic, challenging environment, and to do it in a way that is respectful of the wildlife and the wilderness resources. While it is hoped that most hunters will follow proper procedures, a guide can help ensure that ethical hunting practices and procedures are followed. As a result of having a professional guide, there may be a reduced number of wounded bear, deer, and wolf. While guides provide a service, the species on Kuiu Island being hunted do not require the use of a guide by the State of Alaska. These species include black bear, deer, and wolf.

Knowledge. Guides are knowledgeable about animal behavior and as well as where issues with other users could occur (subsistence, other guides). This information is not readily available to the average nonresident hunter. Guides share appropriate *Leave No Trace* practices with clients to help with the protection of the rainforest environment.

Safety risk. Hazards that might be encountered include wounded black bears. Guides generally have more knowledge and skill, know how to track and retrieve animals and have back-up rifles in case of emergency. There have been infrequent maulings of hunters by black bear. The majority of these were local residents.

Special objectives. Guides can help accomplish ADFG's harvest objectives and can ensure that hunters care for and process the carcass in accordance with state law. The guide hunt records, turned in to the Commercial Services Board, help to track harvest locations and hunter success rates.

Demand/utilization. The maximum number of black bear hunts authorized to outfitter/guides per year on the entire Petersburg Ranger District is 188 hunts. The demand for these hunts is highest on Kuiu Island.

Level of use and conflict. The current level of use is moderate. As shown in Table 1 the RVDs have increased over the past five years from 15 to 29. For Kuiu Island the black bear harvest has increased about 10 percent annually from 1990 to 2000 (Peacock 2001). While there are few reported conflicts with local users, there have been conflicts between hunting guides groups as well as other recreationists across the Tongass. Bear hunters are generally less tolerant of crowding than other recreationists. The carrying capacity for this area is currently being reviewed and a decision for the number of hunts is being considered in an environmental analysis.

Land capability. Current resource concerns from hunters who camp include tree-cutting, litter, fire rings, and social trails. Most of these are related to camping from unguided hunters. The majority of hunting clients live aboard a boat where resource concerns from that activity are few.

Public purpose. This activity contributes to the recreational purpose (hunting).

### Freshwater fishing

Wilderness dependency.

- a. **National Forest System (NFS) land.** Opportunities exist outside of the Wilderness Area for fishing. Approximately two-thirds of the Tongass National Forest is not

designated Wilderness. Most of the non-Wilderness lands in Southeast Alaska are open for fishing.

- b. **Non-NFS.** There are fewer opportunities for fishing in the vicinity on private or state lands. The majority of Southeast Alaska is National Forest system lands, and the opportunity for fishing is proportionate.

Forest-wide availability. On the Tongass fishing is offered in other Wilderness Areas, and across most of the land use designations.

Wilderness character. ADF&G sets harvest levels. Most clients and guides live on a boat and spend very little time in the upland areas of the Wilderness during a typical day. Guided fishing should have little effect on wilderness character with the exception of potential impacts to hiking routes if the amount of fishing use increases.

Skills and equipment. Unguided or guided freshwater fishing is uncommon in these two Wilderness Areas, partially due to the remoteness and partially due to the few sizable streams or lakes. Most of the fishing is an incidental activity, although Alecks Creek and Lake occasionally are visited specifically for the purpose of fishing. The streams that have fish do not have trails for access, so navigation map and compass skills are needed, and previous experience with the route is beneficial. Guides can also impart knowledge of catch and release techniques, where the runs are occurring, fish identification, avoiding bears encounters on fish streams, and proper disposal methods. In addition, a boat is normally needed for access and not all persons have the skills to successfully navigate a boat to this area, given the need for local knowledge of the area (weather, tides, etc.).

Knowledge. A guide can provide assistance and information to visitors who are unfamiliar with the terrain and environment of Southeast Alaska. It is unlikely that the average non-resident visitor would possess the ability to know where to hike or fish safely and successfully.

Safety risk. Hazards encountered might include black bears, getting lost, slips and falls, and hypothermia. The presence of an outfitter/guide can contribute to a feeling of safety. A portion of prospective wilderness visitors would probably not visit the area on their own because of concerns for their safety.

Special objectives. Outfitters and guides promote proper catch and release techniques and an understanding of population dynamics in isolated streams and lakes. Outfitter/guides are required to turn in freshwater fishing logs to ADF&G. Results of these are used to determine the level of fishing effort, as well as the harvest of all species.

Demand/utilization. There have been few requests for this activity in the past ten years.

Level of use and conflict. There have been no reports of conflicts of use on the fishing streams. The level of use has trended downward over the past five years from 20 to 6 RVDs.

Land capability. Currently, resource concerns from this activity are litter along streambanks, development of 'fishing paths,' and displacement of wildlife.

Public purpose. This activity contributes to the recreational purpose (fishing).

## Appendix B

### Remote Setting Nature Tours (RSNT)

#### Wilderness dependency.

- a. **National Forest System (NFS) land.** Opportunities exist outside of the Wilderness Area for RSNT. Approximately two-thirds of the Tongass National Forest, are not designated Wilderness.
- b. **Non-NFS.** Opportunities for RSNT are limited. The majority of Southeast Alaska is within the Tongass National Forest, and the opportunity for RSNT is proportionate.

#### Forest-wide availability. The Tongass offers this activity in several other Wilderness Areas.

Wilderness character. While floatplanes are allowed on lakes through enabling legislation (ANILCA), permitting guides to conduct this activity does allow a higher level of motorized activity and could contribute to a loss of solitude in these areas. As long as these activities are low levels of use, day-use, and temporary in nature, they would not be expected to significantly impact the natural, untrammeled and undeveloped qualities already present. The introduction of small cruise ship use would represent a significant change in the type and amount of use in the Wilderness Areas. It would have a negative impact on the solitude and the primitive and unconfined recreation of the Wilderness. Small cruise ship use would also have the potential to impact other aspects of wilderness character.

Skills and equipment. RSNT activities include sightseeing, hiking, and wildlife viewing, at remote (non-road system NFS lands) locations. Hiking is a skill that is relatively easy to master. Hiking equipment can be obtained at relatively inexpensive prices at stores nationwide. Wildlife viewing equipment such as spotting scopes, cameras, and binoculars are obtained at various locations nationwide or they can be provided by the outfitter/guide. For flightseeing, an aircraft (helicopter or fixed wing) is required, which the average visitor would not own. These two Wilderness Areas are typically viewed from a boat, and the exposed waters require a seaworthy boat, which most visitors do not own.

Knowledge. A guide can provide assistance and information to non-resident visitors who are unfamiliar with the terrain and environment of Southeast Alaska. It is unlikely that the average non-resident visitor would possess the knowledge of where to hike, view wildlife and spectacular scenery safely and successfully. Most visitors do not have the knowledge to safely navigate the open waters to reach this area. Guides can teach visitors the techniques of how to minimize their impacts while hiking through the forest or muskegs. Guides who frequent the area also have the historical knowledge of the area of where the best durable sites are located, as well as what areas to avoid due to problems from previous impacts.

Safety risk. Hazards encountered might include bears, slips and falls, sudden weather changes, and hypothermia. The presence of an outfitter/guide could contribute to the safety of non-resident visitors. A portion of prospective wilderness visitors would probably not visit the area on their own because of concerns for their safety.

Special objectives. There is a need for outfitters and guides to provide services to educate the public regarding the importance of the wilderness resource, *Leave No Trace*, and specifically the special features unique to the Tebenkof Bay and Kuiu Wildernesses. Visitors who learn these skills can use them in other Wilderness Areas. Outfitters whose trip emphasis is based on appreciation for the Wilderness, educating clients and instilling a wilderness ethic can assist in meeting this management objective. An outfitter can also inform the Forest Service of their observations, including other groups seen and resource damage observed.

Demand/utilization. This activity has relatively low demand/utilization within the area. Since 2002 the RVDs have ranged from 0 to 14 (Table 1). There have been mid-size cruise ship

companies who have expressed an interest to have several skiff loads of clients disembark from the mother ship and hike in the area. The district determined that having several Zodiac skiffs coming to shore with 12 to 50 clients would not meet the standards for wilderness management.

Level of use and conflict. Current level of use is low. Increases in motorized access from large boats or from airplanes could create conflict with users who use less intrusive forms of access. Guides who use sea kayaks have complained about the impacts from large motorized boats.

Land capability. An outfitter/guide must educate visitors on *Leave No Trace* techniques and would show them how to minimize visitor impacts from RSNT.

Public purpose. This activity can contribute to the recreational purpose.

## VI. Determination of Need and Extent

As stated in the Introduction, above, this document is tiered to the Tongass Forest Plan and the *Determination of Need for Commercial Services within Wilderness Areas on the Tongass National Forest* (2007). The Forest-level Determination of Need document, states “subsequent decisions regarding the type, extent, amount, and location of commercial use for all Wilderness Areas on the Tongass must be made on a wilderness-by-wilderness basis.” It further states, “future decisions or revisions of environmental documents that allow commercial services in a Wilderness Area will be specific to each Wilderness and include”:

1. A statement defining the wilderness character;
2. Specific information regarding the wilderness values which require monitoring or protection;
3. A finding that commercial services are necessary for that Wilderness Area;
4. A description of the uses to authorize;
5. The amount of use to authorize; and
6. A description of the extent of activities.

The items specific to Tebenkof Bay and Kuiu Wilderness Areas are addressed, below.

### Statement Defining the Wilderness Character of the Tebenkof Bay and Kuiu Wilderness Areas

The study area has a high quality of wilderness character. They are highly untrammelled; the area largely operates without human management or manipulation. The ecosystems are largely intact with very few non-native species and good native populations, providing for a high level of naturalness. There is very little human development in the Wilderness resulting in it having a high level of being undeveloped. The solitude or primitive and unconfined recreation opportunities are excellent due to the remoteness and low levels of human use, although subject to impacts from off-forest use on the saltwater or from the air.

### Finding or Determination of Need for Commercial Use

**Determination of need for commercial use for backpacking/camping:** Of the permitted activities in these Wilderness Areas to date; camping has had the highest amount of use over the years (Table 1). Camping by those not well versed in *Leave No Trace* principles can cause unnecessary impact to an area. By practicing and teaching low impact techniques for camping, professional guides are helping to ensure that the wilderness integrity of the area is maintained and that visitors are educated in *Leave No Trace* principles/techniques. Having experienced and knowledgeable guides can help managers ensure that

camping use is located on durable sites and resource impacts are minimized. Use by the guided sector is much easier to track, monitor and regulate and can be used as a tool to have groups camp in locations that are best for the resources. Care must be taken to ensure that the current levels of solitude are maintained or improved. Camping use is appropriate if done in a low impact manner.

**Commercially guided camping will be authorized in the Tebenkof Bay and Kuiu Wilderness Areas through this needs assessment .**

**Determination of need for commercial use for hunting:** There has been concern expressed by hunters and guides that overcrowding is occurring on the Tongass for both black and brown bear hunting. Kuiu Island does not have brown bears, but it does have a significant black bear population. The overcrowding concern is between hunters, as well as between hunters and non-hunters. This concern has been expressed for Kuiu Island because of the renowned high black bear densities on the northern portion of the island and the number of people attracted to that phenomenon.

The Wilderness Act directs the Forest Service to protect the public's recreation experience and manage Wilderness for outstanding opportunities for solitude or undeveloped and primitive recreation. The Forest Plan directs the Forest Service to manage the Wilderness land use designation (LUD) primarily for the Recreation Opportunity Spectrum class of Primitive, which means that Wilderness Areas are the places that the public is most likely to experience isolation from most sights and sounds of humans. Other LUDs are managed for higher levels of development and amounts of interaction between people. Therefore, when managing for recreation experience on all LUDs across the Forest, Wilderness is the first LUD that is limited to preserve the opportunity for uncrowded bear hunting. Current black bear hunting use within the Tebenkof Bay and Kuiu Wilderness is generally lower than other areas on Kuiu Island. Higher bear concentrations and easier access focuses the majority of black bear hunting north of Bay of Pillars. However, use has increased over the last few years as hunter pressure has displaced hunters further south.

Currently on the Petersburg Ranger District, commercially guided black bear hunts are capped at 188 hunts. For the foreseeable future, this value will not increase. If the demand in hunter use continues to rise, most likely a prospectus will be initiated to allocate future commercially guided hunts.

**Commercially guided hunting in the Tebenkof Bay and Kuiu Wilderness Areas at current levels will be authorized through this needs assessment. Allocations within Wilderness have been limited to 10 percent of the Wrangell Ranger District recreation use carrying capacity. In order to protect the wilderness hunting experience, it is recommended to maintain this limitation, and to look for additional ways to respond to guides and hunters complaints regarding loss of solitude.**

**Determination of need for commercial use for freshwater fishing:** Very little guided freshwater fishing takes place within these two Wilderness Areas. The primary location for fishing is at Aleck's Creek. The use has ranged from 20 RVDs in 2000, to 2 RVDs in 2005 (Table 1). Guides are primarily needed to access this remote area, both for transport to the area and for route finding in an area without trails such as Alecks Creek.

Guided saltwater fishing from boats is a commercial activity that occurs off of National Forest lands and therefore is not an activity regulated by the US Forest Service.

**Commercially guided freshwater fishing in the Tebenkof Bay and Kuiu Wilderness Areas will be authorized through this needs assessment.**

**Determination of need for commercial use for Remote Setting Nature Tours:** Visitors in this category access the area via watercraft or floatplane. Activities such as wildlife viewing, sightseeing, picnicking, birding, photography, hiking, nature viewing, etc. would all be grouped into this activity. Having the knowledge, skills, experience, and equipment, even in good weather, to navigate the waters of Chatham and Sumner Straits, or to fly into the area lakes, are things the average visitor would not have. For most of the population, outfitters and guides provide the only means by which they could access or experience the

area. Through interpretation of the area's natural and cultural history, guides can increase the appreciation of the area for the people they are serving. Cruise ships have the potential to bring large numbers of visitors into the Wilderness, which would bring substantial negative change to the wilderness character, especially in light of the extraordinary outstanding opportunities for solitude or primitive and unconfined recreation that the area offers currently. Even a small increase would be a proportionally significant change. RSNT opportunities for larger groups exist at many places outside these two Wildernesses. Both Wilderness Areas have a niche of providing excellent opportunities for solitude, as well as primitive and unconfined recreation. These opportunities are becoming harder to find on the Tongass as the tourism industry grows. Management of these Wilderness Areas will ensure protection of these opportunities for small groups of the public.

**Commercially guided RSNT in the Tebenkof Bay and Kuiu Wilderness Areas *will* be authorized through this needs assessment where the standards for a Primitive ROS experience can be met<sup>4</sup>; an activity group size will not exceed 12 people; exceptions will be rare.**

### **Information Specific to Tebenkof Bay and Kuiu Wilderness Areas Which Requires Monitoring or Protection of Wilderness Values**

The exceptional opportunities for solitude and the primitive and unconfined recreation of this area need to be monitored to ensure appropriate management.

The high quality of the native flora and fauna biological systems need to be monitored to ensure appropriate management.

### **Description of Uses to Authorize**

Backpacking/camping

Freshwater fishing

Hunting

Remote Setting Nature Tours (RSNT)

### **Amount of Use to Authorize**

The amount of use in Wilderness is determined and presented in the **Petersburg Ranger District Recreation Use Carrying Capacity Report** using the information presented in this needs assessment.

<sup>4</sup> Tongass National Forest Land and Resource Mgmt. Plan, Wilderness Management Prescriptions, Recreation and Tourism.

# Appendix 1. Wilderness Management Direction

## **Wilderness Management Direction for a Needs Assessment**

Following is a discussion about when a needs assessment may be employed to address commercial use requests within Wilderness based on a regional or local wilderness management concern.

### **Direction Provided by the 1964 Wilderness Act**

The Wilderness Act of 1964 states the purpose of Wilderness is “to secure for the American people of present and future generations the benefits of an enduring resource of Wilderness.” Wilderness being an area “affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable; . . . has outstanding opportunities for solitude or a primitive unconfined type of recreation”; . . . and “may also contain ecological, geological, or other feature of scientific, educational, scenic, or historical value.”

The Wilderness Act also describes how Wilderness Areas are to be used and managed. Management is to focus on preserving the wilderness character of the area; and use of the area “shall be devoted to the public purposes of recreational, scenic, scientific, education, conservation, and historical uses.” In realizing these uses Wilderness provides an opportunity for solitude or primitive unconfined types of recreation not attainable in settings more man-made, or influenced by humans.

In accomplishing the purpose of, and uses of Wilderness, the Wilderness Act gives some additional direction. Specifically, with one notable exception commercial enterprises are prohibited by Section 4(c) of the Act. The exception covered in Section 4(d) (6) says “commercial services may be performed within the Wilderness Area . . . to the extent necessary for activities which are proper for realizing the recreation or other Wilderness purposes of the areas.”

### **Alaska National Interest Lands Conservation Act of 1980 (ANILCA)**

Section 707 of ANILCA states “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 ...”

Items provided for in ANILCA wilderness include:

1. Section 811 – (a) Ensures rural residents reasonable access to subsistence resources and (b) permits the use of snowmobiles, motorboats, and other means of surface transportation traditionally employed for subsistence purposes, subject to reasonable regulation.
2. Section 1010 – Mineral assessments with access by air with reasonable requirements to protect the resources of the area.
3. Section 1110(a) – Allows for the use of snowmachines, motorboats, airplanes and nonmotorized surface transportation methods for traditional activities on conservation system units, including designated Wilderness, and for travel to and from villages and homesites, subject to reasonable regulation to protect the natural and other values of the unit or area.
4. Section of 1303(b)(1) – Allowance for the construction of new cabins and administrative cabins if necessary for the administration of the area as Wilderness
5. Section 1303(b)(2) – Allowance for the continuation of existing cabins.
6. Section 1310 – Allowing for the maintenance of existing and future navigation aids and other facilities.

7. Section 1315(c) – Permitting the continued use and maintenance of public use cabins. 1315(d) allows for the construction of new cabins if they're necessary for the protection of public health and safety.
8. Section 1316(a) – Allows for existing and future establishment of temporary structures necessary for the taking of fish and game subject to reasonable regulation to insure compatibility, the continuance of existing uses, and the future establishment, and use, of temporary campsites, tent platforms, shelters, and other temporary facilities and equipment directly and necessarily related to such activities. Section 1316(b) allows for the denial of the temporary facilities if the use of equipment or facilities is determined to be detrimental to the wilderness character.

In ANILCA, there are 17 sections that may influence the character of the wilderness and the consideration of commercial use. During the evaluation of commercial recreation use for any one Wilderness, an effort should be made to consider the long-term effects of accommodating increasing uses or proposals for new use. The economic benefits to a business are not a substantive basis of a decision to allow use presented in either the Wilderness Act or ANILCA.

### **Direction Provided by Regulation**

Federal Regulations 36 CFR 293.2 – Objectives, states in part: “Except as otherwise provided in the regulations..., National Forest Wilderness shall be so administered as to meet the public purposes of recreational, scenic, scientific, educational, conservation, and historical uses; and it shall also be administered for such other purposes for which it may have been established in such a manner as to preserve and protect its wilderness character...To that end:

(a) Natural ecological succession will be allowed to operate freely to the extent feasible.

(b) Wilderness will be made available for human use to the optimum extent consistent with the maintenance of the primitive conditions.

(c) In resolving conflicts in resource use, wilderness values will be dominant to the extent not limited by the Wilderness Act, subsequent establishing legislation, or the regulations in this part.”

Federal Regulations 36 CFR 293.8 - Permanent structures and commercial services, states in part that: “The Chief, Forest Service, may permit . . . commercial services within National Forest Wilderness to the extent necessary for realizing the recreational or other Wilderness purposes, which include, but are not limited to, the public services generally offered by packers, outfitters, and guides.”

### **Agency Direction**

#### **USDA Forest Service Strategic Plan for 2004 - 2008**

The mission of the USDA Forest Service is based on the relationship between the American people and their natural resource heritage. The relationship is founded on the principles of sustaining U.S. natural resources for future generations, producing personal and community well-being, and providing economic wealth for the Nation.

The Strategic Plan embodies the Forest Service’s many areas of responsibility, as captured in the agency’s mission statement:

“The mission of the USDA Forest Service is to sustain the health, diversity, and productivity of the Nation’s forest and grasslands to meet the needs of present and future generations.”

One of the many goals of the Strategic Plan is to provide high-quality outdoor recreational opportunities on forests and grasslands, while sustaining natural resources, to meet the Nation’s recreational demands.

### Forest Service Chief's 10-Year Wilderness Stewardship Challenge

In 2005, the Chief of the Forest Service adopted the 10-year Wilderness Stewardship Challenge (WSC) as recommended by the Chief's Wilderness Advisory Group. This effort is a renewal of the commitment to wilderness by pledging to bring all 406 wildernesses administered by the Forest Service to a minimum level of stewardship within 10 years. Element 7 of the WSC identifies that, **"Needs assessments are completed for new operations or for major changes to existing outfitter programs."** As clarified in the definitions for this element; *"needs assessments"*; a methodology for determining if, in fact, there is a "need" for private enterprise to assist the Agency in providing access, services and/or other assistance for the recreating public to safely and properly enjoy National Forest Wilderness."

Another part of the WSC related to forest plan management direction is Element 5 – Protecting Opportunities for Solitude or Primitive and Unconfined Recreation. Managing to protect "outstanding opportunities for solitude or a primitive and unconfined type of recreation" has been perhaps the most controversial aspect of wilderness management to date. Controversy typically emerges if managers propose any type of restriction on visitor access or behavior, such as use limits, to improve opportunities for solitude. Factors contributing to this controversy include:

1. Lack of clarity over the meaning of solitude thus leading to lack of agreement over what the problem really is (e.g. visitors may view the concept holistically while managers may focus on the number of encounters in particular locations).
2. Perception that solitude is too subjective and individualistic to manage for.
3. Lack of standards or agreement on standards that define when there is a problem requiring corrective action.
4. Managing for solitude without equal consideration of managing for primitive and unconfined recreation opportunities.
5. The importance of access to visitors even when they support Wilderness preservation.
6. Tension between providing outstanding opportunities for solitude vs. primitive and unconfined recreation.

#### Forest Service Manual Direction

Forest Service Manual Chapter 2320 – Wilderness Management, has been reserved by the Washington Office. Management direction regarding the implementation of specific exemptions for wilderness management in the Regional Supplements to the Forest Service Manual, still remain in effect. The Forest Service Manual from the Washington Office is expected to be reissued sometime in the near future.

Forest Service Handbook (FSH) 2709.11, 41.53e - Needs Assessment, Resource Capacity Analysis, and Allocation of Use – Conduct a needs assessment to determine the public or agency need for authorized outfitting and guiding activities. When conducting a needs assessment for outfitting and guiding activities in a Wilderness Area, assess whether these activities are necessary for realizing the recreational or other wilderness purposes of the area and the extent to which the activities may be authorized consistent with maintaining the wilderness character of the area.

#### Other FSM direction includes

Under FSM 2340 – Privately Provided Recreation Opportunities

##### 2340.2 - Objectives

To provide, under special use authorization, sufficient, suitable facilities and services that supplement or complement those provided by the private sector, State, and local government on private land and the

Forest Service on National Forest System land to meet public needs, as determined through land and resource management planning.

To facilitate the use, enjoyment, understanding, and appreciation of natural resource settings on the National Forest.

### **Forest Plan Direction for Wilderness**

#### Goals

To manage all designated Wilderness to maintain the enduring resource of Wilderness as directed by the Wilderness Act of 1964, subject to the special provisions and exceptions in the Alaska National Interest Lands Conservation Act of 1980 (ANILCA) and the Tongass Timber Reform Act of 1990 (TTRA).

Protect and perpetuate natural biophysical and ecological conditions and processes. Ensure Wilderness ecosystems are substantially free from the effects of civilization.

Provide a high degree of remoteness from the sights and sounds of humans, and opportunities for solitude and primitive recreation activities consistent with Wilderness preservation.

Keep Wilderness untrammelled and free from human control or manipulation, including actions taken to manage Wilderness.

Protect the undeveloped character of Wilderness by following legislative guidelines regarding permanent improvements or human occupation, including mechanized transport and motorized equipment.

#### Objectives

Apply a multi-disciplinary focus to Wilderness management; consider stewardship of Wilderness in the annual program of work by all resources.

Manage recreation activities so that the levels of social encounters, on-site developments, methods of access, and visitor impacts indicated for the Primitive Recreation Opportunity Spectrum (ROS) Class are emphasized. Areas managed as Semi-Primitive within a Wilderness are an exception and are not encouraged.

Provide for public uses of Wilderness as authorized in the Wilderness Act, but subject to ANILCA provisions for motorized and non-motorized access and travel, including reasonable traditional subsistence use by rural residents, and provisions of other applicable Wilderness designation acts.

Maintain trails and primitive facilities that are in harmony with the natural environment and that promote primitive recreation opportunities. Feature facilities designed primarily to provide resource protection and encourage smaller group size and emphasize challenge and risk instead of convenience.

Maintain the Wilderness capacity to provide information on natural ecological processes.

Preserve and perpetuate biodiversity.

Inventory, reduce, and, when possible, eliminate non-native species in Wilderness

Manage Wilderness as a place where self-reliance and primitive skills are needed and can be honed.

### **Stikine Area Outfitter and Guide Environmental Assessment**

In 1997, the ***Stikine Area Outfitter and Guide Environmental Assessment*** (EA) to develop a strategy to manage outfitter and guide special use permits was completed for both the Wrangell and Petersburg Ranger Districts. A Decision Notice was published in August 1997 describing the rationale for the selected alternative. The Districts reviewed the EA in April of 2004. The review recommended a few minor changes (primarily to address new sites and roads) and determined that no further environmental analysis was required and that the 1997 Decision Notice would be extended until the next review (scheduled for 2010).

Included in the 1997 ***Stikine Area Outfitter and Guide Environmental Assessment*** is a Recreation Use Carrying Capacity Report (CCR) developed to determine the maximum amount of use that could be accommodated in a given area without loss in the quality of the natural environment and/or the prescribed visitor experience (ROS). The CCR provides managers with a tool and rationale for apportionment of outfitter and guide use allocations. When possible, conservative use variables were used in calculations to take into account the more primitive experience that most visitors expect in Alaska.

The EA includes various Mitigation Measures that are used to address site specific concerns in the various study areas. The Mitigation Measures are included with all Outfitter and Guide Special Use Permits as Special Stipulations and therefore become part of the permit. Failure to adhere to the Special Stipulations would be a violation of the terms in the Special Use Authorization and could lead to the termination of the permit. The Special Stipulations that address areas of concern are:

1. Outfitter/guides will submit revisions of their Operating Plans in writing.
2. Land ownership is mixed and it is the responsibility of the permit holder to determine ownership and obtain proper authorization for use of private, native, and/or local government-held lands.
3. Outfitter/guides will incorporate *Leave No Trace* skills into all activities on National Forest System lands (<http://www.lnt.org/index.php>).
4. Outfitter-guided use of public use recreation cabins or their amenities (e.g. skiffs, firewood, fire rings) is prohibited. Exceptions may occur as specifically approved for a site by the District Ranger. These exceptions must be identified in the permit or addressed in District Stipulations.
5. Within designated Wilderness, no more than 12 people (including guides) can occupy a site at one time. "Site:" an area on the National Forest occupied by persons not within sight and sound of other Forest users.
6. All campfires will be built below high tide, as mound fires (a LNT technique) or in fire pans.
7. Beach Meadows: Outfitter/guides will not establish camps, or allow their clients to camp in these areas. When walking through these areas, people should stay on existing paths and game trails to avoid trampling or damaging vegetation in beach meadows. Located at the margin between marine beaches and the forest fringe, beach meadows are characterized by the presence of tall grasses, beach pea, Indian paintbrush, Pacific silverweed, yarrow, chocolate lily, pretty shooting star, and Nootka lupine. These meadows often have between 20-40 different plant species, some of which are on the sensitive species list.
8. Impacts on Bald Eagle Nest Sites: The Forest Service and the U.S. Fish and Wildlife Service have a Memorandum of Understanding which establishes a minimum 330-foot radius "habitat management zone" around each bald eagle nest tree. Camping in this zone is prohibited to guided groups.

9. A copy of the permit must be with the operator at all times, when operating on National Forest System lands.
10. Use Reports will reflect specific locations of use on National Forest System lands.
11. 36 CFR Ch.11 261.10 The following are prohibited: ...(d) Discharging a fire arm or any other implement capable of taking human life, causing injury, or damaging property: (1) in or within 150 yards of a residence, building, developed recreation site or occupied area, or (2) across or on a Forest development road or a body of water adjacent thereto, or in any manner or place whereby any person or property is exposed to injury or damage as a result in such discharge.

## Appendix 2. ROS classes for Tebenkof Bay and Kuiu Wilderness Areas.

### Primitive

Setting indicators	Standards and Guidelines
Scenic Quality	Not to exceed the High Scenic Integrity Objective. An Existing Scenic Integrity level of Very High is fully compatible and encouraged
Access	Non-motorized cross-country travel and travel on non-motorized trails and on waterways is typical. Use of airplanes, helicopters, motorboats, off-highway vehicles, and snowmachines for traditional activities, subsistence, emergency search and rescue, and other authorized resource management activities may occur but is rare.
Remoteness	No or infrequent sights and sounds of human activity are present. Setting is located more than 1.5 hours walking or paddling distance, or 3 miles, from any human developments other than infrequently traveled marine travelways. Areas are generally greater than 5,000 acres, but may be smaller if contiguous with a Semi-Primitive class.
Visitor Management	On-site regimentation and controls are very rare. Signing is limited to directional information and safety. There are no on-site interpretive facilities. There is great opportunity for discovery on the part of the users.
On-site Recreation Development	Structures do not exceed Development Scale I, except for public recreation cabins, and are maintained for appropriate levels of use.
Social Encounters	User meets less than three parties per day during trip. No other parties are within sight or sound of dispersed campsites or cabins. Authorize a party size of no more than 12 persons for any one site or activity group for commercial recreation use. Exceptions to the commercial group's size should be rare. A group size of 12 persons or less is recommended for general public use. Refer to REC122 in Chapter 3 for exceptions.
Visitor Impacts	Visitor-caused impacts to resources are slight and usually not noticeable the following year. Site hardening is limited to boardwalk trails and necessary boat moorings or bear-proof food caches and rustic public recreation cabins

