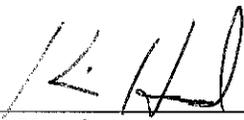
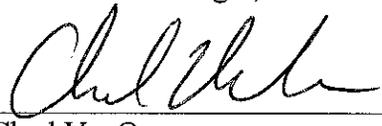


Kootznoowoo Wilderness Commercial Needs Assessment

Admiralty Island National Monument

Tongass National Forest

Submitted by:  10/18/2013
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Date



Kootznoowoo Wilderness Recreation Commercial Needs Assessment Admiralty Island National Monument Tongass National Forest

Executive Summary

This document applies the criteria of Section 4(d)6 of the Wilderness Act to determine which recreation commercial service activities may be necessary in the Kootznoowoo Wilderness Area.

Commercial services may be performed within the wilderness areas designated by this Act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.

This assessment pertains solely to recreation commercial service activities. It does not consider other commercial or noncommercial uses. The need for recreation commercial service activities is determined by their ability to realize the recreational or other wilderness purposes of the Wilderness Act and their compatibility with preserving wilderness character.

This assessment concludes with a determination of need for five recreation commercial service activities in the Kootznoowoo Wilderness. Need was determined with 16 screening questions that assessed commercial service activities against the public purposes and compatibility with preserving wilderness character as defined in the Wilderness Act of 1964 and consistent with the Alaska National Interest Lands Conservation Act of 1980 (ANILCA). If recreation or other public purposes are realized while wilderness character is upheld, commercial services may be deemed necessary. In order for a positive determination of need, the recreation commercial service activity must at a minimum meet the recreation purpose and be compatible with preserving wilderness character. The following summarizes the findings.

Determination of Need for Commercial Service Activities:

- *Remote setting nature tour* commercial service activities are necessary in the Kootznoowoo Wilderness.
- *Floatplane landing tour* commercial service activities are not necessary in the Kootznoowoo Wilderness.
- *Camping* commercial service activities are necessary in the Kootznoowoo Wilderness.
- *Freshwater fishing* commercial service activities are necessary in the Kootznoowoo Wilderness.
- *Hunting* commercial service activities are necessary in the Kootznoowoo Wilderness.

Commercial services may only occur *to the extent necessary* as mandated by Section 4(d)6 of the Wilderness Act. Subsequent site specific commercial use allocation decisions under the National Environmental Policy Act will further define commercial service activities (locations, timing of use, numbers of visitors, etc.) to ensure the preservation of wilderness character.

I. INTRODUCTION

This document is a wilderness commercial needs assessment for recreation commercial services in the Kootznoowoo Wilderness Area, Admiralty Island National Monument. It applies the criteria of Section 4(d)6 of the Wilderness Act of 1964 (Wilderness Act) to determine which recreation commercial service activities may be necessary in the Kootznoowoo Wilderness. This document also applies other specific criteria of the Wilderness Act to determine the need for commercial outfitter and guide activities.

The need for recreation commercial services is determined by assessing the ability of activities to fulfill the recreational or other wilderness purposes of the Wilderness Act. In addition, commercial service activities must be compatible with preserving wilderness character. A determination of need may be found where activities fulfill the recreation purpose or other purposes of the Wilderness Act and are compatible with preserving wilderness character. The preservation of wilderness character will also be a critical factor in further defining site specific constraints in capacity allocation decisions when determining 'the extent necessary' for commercial service activities.

This needs assessment is part of a sequential process of administering recreation commercial use on National Forest System lands within wilderness. It only pertains to recreation commercial activities and does not apply to other commercial or non-commercial uses. Other aspects of administering recreation commercial use outside the scope, but tiered to this assessment include:

National Environmental Policy Act (NEPA) analyzes a proposed commercial outfitter and guide allocation of the overall recreation capacity and will establish mitigation measures that balance use with protection of the National Forest resource. A decision made in this analysis would define the extent and amount of commercial recreation use to be authorized. These public planning processes inform decision makers of choices among alternative courses of action based upon resource capability and public input.

A *prospectus* may be necessary to implement NEPA decisions when demand for commercially guided recreation opportunities exceeds the available capacity. A prospectus requires commercial operators to submit bid applications that meet specific criteria. The Authorized Officer allocates commercial use to businesses that best respond to the criteria.

Special use permits authorize individual outfitter and guides within the determined allocation and according to established mitigation measures.

This needs assessment:

1. Determines the need for various activities of commercial outfitter and guiding services based on fulfilling the purposes of the Wilderness Act and compatibility with preserving wilderness character within the Kootznoowoo Wilderness.
2. Is an internal analysis.
3. Does not analyze or mitigate potential environmental impacts from commercial outfitting and guiding activities.
4. Does not determine the extent and amount of recreation commercial use that may be authorized.

The assessment considers the entire Kootznoowoo Wilderness Area. The Kootznoowoo Wilderness Area includes all National Forest System lands above mean high tide and excludes areas with reserved rights to Kootznoowoo Corporation for development of Thayer Creek Hydro and quiet use and enjoyment of corridor lands in Mitchell, Kanalku and Favorite Bays.

This is intended to be a living document. It is recognized that wilderness conditions and factors that affect them may change, as well as market demands for various commercial service activities. When substantial changes occur in natural systems and/or commercial recreation service markets, this assessment will be updated accordingly.

This needs assessment is organized into five major sections and appendices to include:

- I. **Introduction** – provides the context and scope of this needs assessment.
- II. **Kootznoowoo Wilderness** – provides brief overview of the wilderness qualities and applicable laws.
- III. **Commercial Service Activities & Public Purposes** – defines the commercial service activities, purposes and screening questions for determining need.
- IV. **Wilderness Character** – defines wilderness character and provides screening questions to determine compatibility with activities.
- V. **Determination of Need for Commercial Service Activities** – presents findings for determination of need.

II. KOOTZNOOWOO WILDERNESS

Kootznoowoo Wilderness: The Bear Fort

Walk carefully here. The Tlingit people of Southeast Alaska have long known that brown bear outnumber people by a large margin on the rainforest island wilderness known as Kootznoowoo, the "bear fort." Here the brown bear confronts us with our fear of the primeval forest and serves as the ambassador for all things wild. If we followed the brown bear through the course of her year, from her rocky alpine den to a coastal stream exploding with spawning salmon, we'd discover a vast place known intimately by smell and taste. If we followed her tracks along the edge of a meadow to her lingering scent on the bark of a spruce tree, we'd inhale her secret message: "I am here, I walk this place". It is your place to feel the wild pulse of the earth, where the ambassador treads on padded feet. Walk carefully.

-Kootznoowoo Wilderness Niche Statement

Admiralty Island has long been associated with the brown bear (*Urus arctos*). The original name, The Bear Fort, indicates early Tlingit were well aware of the dense population of brown bear that distinguishes this island from others. The northern edge of the Kootznoowoo Wilderness lays just 12 boat-miles south of the capital city of Juneau, Alaska. From here, Kootznoowoo Wilderness stretches another 81 miles south to Frederick Sound. Paddlers on the Cross Admiralty Canoe Route cross six lakes and find abundant solitude as they traverse from the traditional Tlingit village of Angoon to the historic homestead of Allen Hasselborg (the bear man of Mole Harbor), a distance of 27 miles. Totaling 956,255 acres (about 1,500 square miles) this wilderness supports approximately one bear per square mile by latest estimate, one of the densest populations known.

Coastal forests of massive Sitka spruce and western hemlock dominate, and while Sitka black-tailed deer stay well hidden in the dense forest, bald eagles are easily found in treetops along most beaches. Harbor seals, Steller sea lions, and humpback whales feed near rafts of sea ducks such as scoters and harlequins. The forest floor lays thickly covered with mosses and blueberry, while muskegs open the tall forest canopy to sedge and sphagnum bogs. Rocky spires break through along the island's high crest with peaks above 3,000 feet. Protected as Admiralty Island National Monument in 1978, almost all but the northern end of the island was designated Wilderness in 1980 under the Alaska National Interest Lands Conservation Act (ANILCA). Additional lands around Admiralty Cove and Young Lake were added as wilderness in 1990 under the Tongass Timber Reform Act (TTRA).

Bear hunting is a traditional sport attracting international and local interest, especially in the spring. Bear viewing is available during the summer at Pack Creek or in other remote bays around the island. Sea kayaking is popular in the relatively protected waters of Seymour Canal and in many other bays including Mitchell Bay near Angoon.

Residents of Angoon rely upon Kootznoowoo Wilderness for subsistence activities, particularly along Chatham Strait. Kake and Petersburg residents hunt deer and brown bear at the southern

edge of the island. Deer hunting in Seymour Canal and northern Admiralty Island is popular with Juneau residents. Several private inholdings and 19 cabins under permit provide a few with year-around homes and most others with seasonal camps.

The Pack Creek Zoological Area (PCZA), located in Windfall Harbor and Swan Cove was first recognized in the 1997 Tongass Land and Resource Management Plan and subsequent revisions as a special management area. The PCZA is famous for the incredible number of brown bears that inhabit its exceptional and diverse landscape. People come from all over the United States and around the world to view bears in this wilderness setting. A wilderness permit is required for visitors to the Pack Creek Bear Viewing Area. The bear viewing area is cooperatively managed with the Alaska Department of Fish & Game. The site allows a maximum of 24 visitors a day during the peak season, of which half are allocated to commercial recreation service providers. A Prospectus for the bear viewing area and larger PCZA was completed in 2012. The PCZA currently has nine recreation commercial service providers that offer an array of remote setting nature tours (wildlife viewing, photography) and camping.

In whole, the Kootznoowoo Wilderness currently has approximately 34 outfitter and guide operations that offer a wide variety of activities including remote setting nature tours (hiking, paddling, exploring, wildlife viewing, etc.), camping, freshwater fishing, and hunting. Currently outfitter and guide service providers are allowed to operate on shore along the entire marine coast of the wilderness area, except for within one mile of Admiralty Cove. The Admiralty Cove area has been excluded from authorized outfitter and guide use due to its close proximity and relatively easy access from Juneau. This area is already well used by the general public (non-commercial users). In addition, there are no outfitter and guide service providers, except Thayer Lake Lodge, authorized to operate within the interior lands (generally ½ mile or more from mean high tide) or lakes of the Kootznoowoo Wilderness due to no requests to conduct this activity or environmental analysis in place to authorize use. Point-to-point transport to more than 20 cabins and shelters on lakes or along the shoreline can be provided by commercial floatplane operators without a permit.

The Wilderness Act and the Alaska National Interest Lands Conservation Act

The Wilderness Act authorizes Congress to designate wilderness areas amidst public lands managed by federal agencies. The goal of the Wilderness Act is to secure for present and future Americans the benefits of an enduring wilderness resource. The law achieves this goal by affirming qualities for which wilderness is to be administered and by limiting uses that degrade those qualities.

The passage of ANILCA established 14 wilderness areas on the Tongass National Forest; including the Kootznoowoo Wilderness (known at that time as “Admiralty Island National Monument Wilderness”). ANILCA also included exceptions to the Wilderness Act that apply to these wilderness areas. Specific sections that apply to the Kootznoowoo Wilderness and this assessment include:

- Section 503(j) allows for the Thayer Lake Lodge special use permit to be renewed as necessary for up to the lifetime of the permittee, or the surviving spouse or child of such permittee, whoever lives longer.

- Section 506(3)(E) allows for the Kootznoowoo Corporation to consult and cooperate with the Secretary of Agriculture in the management of Mitchell, Kanalku and Favorite Bays and their immediate environs and enter into cooperative arrangements as may further the purposes of ANILCA.
- Section 1110(a) allows for the use of airplanes, motorboats, and snowmachines (during periods of adequate snow).
- Section 1303(b)(3) allows for the establishment and continued use of existing administrative sites and visitor facilities.
- Section 1307(a) allows for the continuance of visitor services that were operating on January 1, 1979 in designated conservation system areas (of which Kootznoowoo Wilderness is one); however, there are no present day commercial operations that were authorized use within the bounds of the Kootznoowoo Wilderness Area on that date. This section also provides a preference for providing visitor services within conservation system units; except for fishing and hunting; to Native Corporations and local residents.
- Section 1315(c) allows for the permitting, maintenance, replacement, and continued use of public use cabins.
- Section 1315(d) allows for construction of new cabins if necessary for the protection of public health and safety.
- 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 a significant expansion of existing uses or facilities which would be detrimental to the purposes for which the Kootznoowoo Wilderness was established, including the wilderness character.

Other than these exceptions expressed in ANILCA, commercially guided uses within Kootznoowoo Wilderness are administered according to the Wilderness Act of 1964 (ANILCA Section 707).

The principle administrative charge of the Wilderness Act is to preserve wilderness character. Agencies have defined wilderness character using the descriptive aspects found within the law: untrammeled; undeveloped; natural; outstanding opportunities for solitude or a primitive and unconfined type of recreation, and unique features of ecological, geological or other features of scientific, educational, scenic or historical value. Generally speaking, actions or uses that are compatible with these qualities may be allowed in wilderness.

The Wilderness Act also limits uses that would degrade the qualities of wilderness character. With specific exceptions in the Wilderness Act, it prohibits commercial enterprise, permanent roads, and except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act, temporary roads, motor vehicles, motorized equipment or motorboats, landing of aircraft, other forms of mechanical transport, or installations and structures.

Commercial services, the subject of this needs assessment, are one of the possible exceptions to the prohibition on commercial enterprise per Section 4(d)6 of the Wilderness Act:

Commercial services may be performed within the wilderness areas designated by this Act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.¹

¹ Wilderness Act, 16 USC 1133(d)(5).

III. COMMERCIAL SERVICE ACTIVITIES & PUBLIC PURPOSES

The Wilderness Act was redrafted sixty-five times with intense scrutiny on its wording. The deliberate language of Section 4(d)6 reflects this extensive editing. As Section 4(d)6, in the context of the whole law and its mandate to preserve wilderness character, forms the basis for determining the need for commercial services, an examination of its specific language is merited.

The following sections interpret Section 4(d)6 of the Wilderness Act and discuss how it applies to outfitter and guide commercial services in the Kootznoowoo Wilderness:

- (1) Commercial services
- (2) may be performed
- (3) within the wilderness areas designated by this Act
- (4) to the extent necessary
- (5) for activities which are proper for realizing the recreational or other wilderness purposes of the areas.

(1) Commercial services

The Code of Federal Regulations provides guidance as to the scope of commercial services to be considered under Section 4(d)6 by stating 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.²

Outfitter and guide services addressed in this needs assessment include remote setting nature tours (hiking, paddling, skiing, wildlife viewing, photography, exploring, sightseeing, cultural tours, etc.), floatplane landing tours, camping, freshwater fishing, and hunting. These services represent the range of activities currently sought after by the public who visit the Tongass National Forest. Not all of these activities are currently authorized within the Kootznoowoo Wilderness, but represent reasonably foreseeable future demands for services. Outfitter and guide activities that are currently not authorized by the Forest Service in the Kootznoowoo Wilderness include skiing and floatplane landing tours.

(2) May Be Performed

The word “performed” means “to carry out or fulfill” and is accomplished by guide services under permit from the Forest Service. The word “may” has a specific legal meaning: “action is optional.”³ Hence the managing agency or authorized line officer may opt to permit or not to permit commercial services, or to permit some services but not others.

(3) Within Wilderness Areas Designated By This Act

This language refers to the Wilderness Act and subsequent enabling wilderness legislation, such as ANILCA, which designated the Kootznoowoo Wilderness, and the TTRA which expanded the wilderness area by amending ANILCA.

² 36 CFR 293.8, Permanent structures and commercial services.

³ Forest Service Manual, 1110 Directives, exhibit 1110.8.

(4) To The Extent Necessary

The overriding constraint on commercial services (and all types of visitor use) in wilderness is the mandate to preserve wilderness character. Human influences that impair wilderness character are to be minimized so that the natural conditions are protected, and the benefits of the wilderness resource (social, biological, and physical) are available to future generations.

“Extent” means “scope” or “magnitude.”⁴ The scope or magnitude of commercial services can be gauged quantitatively (the number of permits issued; the number of commercial clients authorized), spatially (where operations are necessary or authorized) and temporally (when operations are authorized). Extent is further defined and constrained by the capacity or capability of the wilderness to support the activity without impairment to wilderness character.

“Necessary” commercial services are those that serve the public’s need to experience wilderness and support management objectives within the capability of the wilderness resource. Commercial service activities are potentially necessary if they help achieve the public purposes of wilderness without impairment of wilderness character.

Need for outfitter and guide commercial services can only occur to the degree where, when and in numbers where wilderness character is unimpaired. Need is defined by a shortage of opportunities for the public to experience wilderness and/or an agency need for assistance with implementation of management objectives which can be addressed through commercial service providers.

(5) For Activities Which Are Proper for Realizing the Recreational or Other Wilderness Purposes of the Areas

Proper activities are those which are compatible with the goals of the Wilderness Act. The paramount goal is the preservation of wilderness character. This includes the use and enjoyment of wilderness by present and future generations. Commercial services can fulfill both stewardship and service roles by engaging in proper and purposeful activities.

Activities conducted responsibly would preserve the integrity of the wilderness resource. At a minimum, such activities would embrace outdoor ethics to minimize impacts and avoid prohibited means that degrade wilderness character, excepting allowable ANILCA stipulations. The stewardship role can be filled further by actively educating clients regarding conservation issues and the benefits of wilderness in times of environmental stress, as well as by actively involving clients in citizen science projects to help administer wilderness.

Activities enhance people’s use and enjoyment of wilderness when wilderness or recreation purposes are realized. Regarding the commercial service activities, this needs assessment examines remote setting nature tours, floatplane landing tours, camping, hunting and freshwater fishing. These activities may be provided if determined to be compatible with the outstanding opportunities for solitude or a primitive and unconfined type of recreation the Wilderness Act seeks to provide. Outfitter and guides play a meaningful role in teaching the skills necessary to enjoy historic and recreational pursuits and in interpreting the scenic, scientific, educational, conservation and historical values of the visited wilderness area.

⁴ Webster’s 9th New Collegiate Dictionary, 1990, page 440.

This section concludes with examining in greater detail:

- Commercial Outfitter and Guide Service Activities
- Recreational or Other Wilderness Purposes

Commercial Outfitter and Guide Service Activities

Activities considered in this needs assessment only include those that occur above mean high tide on National Forest System lands. Also not included is strictly point-to-point transportation services provided at a competitive fee that is not a tour or part of a package trip. Many activities that take place within the Kootznoowoo Wilderness, above mean high tide, are done in combination with activities outside the wilderness on state jurisdiction submerged lands and marine waters. The activities considered in this needs assessment include 1) remote setting nature tours, 2) floatplane landing tours, 3) camping, 4) freshwater fishing, 5) hunting.

Remote setting nature tours encompass, but are not limited to, a wide variety of day use activities such as hiking, paddling, skiing, wildlife viewing, photography, exploring, sightseeing, and cultural tours. All of these activities, except skiing, are currently sought after by wilderness visitors and offered by commercial service providers within the Kootznoowoo Wilderness. The size of these groups tends to be the largest of all activities with a maximum of 12 people at one time. Visitors may spend from a few minutes to many hours participating in these activities. Desirable attributes for these activities include accessible sections of shoreline, maintained trails and facilities, and unique features of geological, ecological or cultural interest. Specific areas within the Kootznoowoo Wilderness that are sought after for these activities include the Pack Creek Zoological Area, Cross Admiralty Canoe Route, Brothers Islands, Seymour Canal, Mitchell Bay and other numerous bays, inlets and waterways along the coast line. Access to the wilderness is only achieved by boat or aircraft. Travel within the wilderness is typically by paddle craft or foot.

Floatplanes are a common and allowed method of transport for recreation use on the Tongass NF. However, the authorization of floatplane landing tours on the Tongass is limited and has not been authorized within the Kootznoowoo Wilderness. A floatplane landing tour is defined in this assessment as a day-use activity that predominantly involves viewing natural features by air and landing once or multiple times within the wilderness and returning back to its point of origin. It typically involves a party of six to twelve people. Visitors typically spend only a few minutes to several hours on land participating in a remote setting nature tour activity. This activity does not include authorized point-to-point floatplane transport used as an ancillary service to another commercial service provider for activities such as remote setting nature tours, hunting, fishing or camping.

Camping is defined as overnight use within the wilderness. Daytime activities may involve boating or kayaking on marine waters or remote setting nature tours, hunting or freshwater fishing within the wilderness. This use depends on sites amenable to camping such as level ground, accessible beach, availability of water, secure boat anchorage or storage, a food cache site, minimal signs of use by bears, and so on. Popular camping locations include sections of accessible marine shoreline, public use cabins, Pack Creek Zoological Area, and the Cross Admiralty Canoe Route. Commercial camping use within the Kootznoowoo Wilderness can be characterized as light, and primarily dispersed along the marine shoreline zone.

Freshwater fishing includes both catch-and-take and catch-and-release methods under state sport fishing regulations (excludes commercial and subsistence fishing). This use depends on places and times where anadromous and resident fish are located. Freshwater fishing activities may be day use, or encompass multiple days. Anglers tend to seek out areas with more solitude and their group sizes are typically smaller than those of remote setting nature tour user groups. Popular guided freshwater fishing locations within the Kootznoowoo Wilderness include Wheeler Creek, Salt Lake/Hasselborg Creek, King Salmon River, and other numerous streams accessed from the marine shoreline. Currently there are no day use outfitter and guided fishing activities that originate from freshwater access points (i.e. fly-in lakes).

Hunting includes the hunting of brown bear, deer, and waterfowl, although most guided hunting in Kootznoowoo Wilderness is for brown bear. This use depends on places and times where game occur and must comply with state regulations. State regulations require a registered guide or next of kin for nonresident brown bear hunters. Additionally, hunting requires a high degree of solitude for safety and practical reasons (undisturbed wildlife). This use typically reflects a boat-based guiding operation that thoroughly explores a bay or an expanded area of marine shoreline for the duration of the hunt. Currently there is only one outfitter and guide service that utilizes an on-shore camp as their base of operations. Groups tend to be smallest in size (2.0 clients per group) to minimize disturbance and competition and to maximize chances of success. The brown bear hunting season opens for a few weeks in the spring and fall and is closed the remainder of the year.

Recreational or Other Wilderness Purposes

Activities provided by outfitters and guides in wilderness must support the recreational or other wilderness purposes as defined in the Wilderness Act and enabling legislation. The “recreational or other wilderness purposes” clause refers to uses supported in the Wilderness Act:

Except as otherwise provided in this Act, **wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.**⁵
[emphasis added]

Collectively, these purposes may be referred to as the “public purposes” of the Wilderness Act.

ANILCA describes similar purposes and values:

§101. (a) In order to preserve for the benefit, use, education and inspiration of present and future generations certain lands and waters in the State of Alaska that contain nationally significant natural, scenic, historic, archeological, geological, scientific, wilderness, cultural, recreational, and wildlife values, and units described in the following titles are hereby established.

These values are covered within the public purposes of the Wilderness Act examined here and within the wilderness character qualities examined later.

The Wilderness Act provides for certain limitations on commercial ventures. Commercial services in wilderness must realize the public purposes of wilderness. Drawing a clear

⁵ Ibid, 16 USC 1133(b).

connection between commercial service activities and purposes is the basis of determining the need for commercial services.

Broadly speaking, activities provided by commercial services for realizing public purposes will expand the capacity of the managing federal agency to administer wilderness areas “for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness...”⁶ Fulfillment of these purposes are further achieved by reviewing operating plans, and completing field inspections and/or client evaluations. More specifically, each purpose must be discussed individually to assure common understanding as to what realizing the purpose means. Descriptions of the public purposes and the screening questions for realizing them in the Kootznoowoo Wilderness follow.

Recreational

The recreational use purpose of wilderness includes participation and/or instruction in activities that are traditional in the Kootznoowoo Wilderness such as hiking, backpacking, canoeing, skiing, wildlife viewing, hunting, and fishing. There is a distinct qualitative aspect to the recreational purpose of wilderness:

An area of wilderness is further defined to mean in this Act an area ... which ... has **outstanding opportunities for solitude or a primitive and unconfined type of recreation**⁷ [emphasis added]

National Forest Wilderness resources shall be managed to promote, perpetuate, and, where necessary, restore the wilderness character of the land **and its specific values of solitude, physical and mental challenge, scientific study, inspiration, and primitive recreation.**⁸ [emphasis added]

This qualitative aspect is realized if outfitter and guides offer activities in a manner that clients can enjoy outstanding opportunities for solitude or primitive and unconfined recreation, including the values of inspiration and physical and mental challenge.

Wilderness in Alaska can be very remote, challenging and not easily accessible to the general public. Specialized skills, knowledge and equipment are often required for access to recreation activities within Alaska wilderness areas. Outfitter and guides offer the opportunity to fulfill the recreation purposes of the Wilderness Act by providing services that assist in overcoming extraordinary challenge and allow the general public to access recreation opportunities. Aspects to consider are the technical and specialized needs to access wilderness and the distance from population centers.

Recreational purpose screening questions:

Rp1 - Do the commercial service activities require an extraordinary degree of specialized skill, equipment and challenge that inhibits access and enjoyment by the majority of the general public?

⁶ Wilderness Act, 1964, 16 USC 1131 (a).

⁷ Wilderness Act, 1964, 16 USC 1131(c).

⁸ Title 36, Code of Federal Regulations, Part 293.2.

Rp2 - Do the commercial services align with recreation pursuits that are traditional within the Kootznoowoo Wilderness?

Scenic

The scenic purpose covers appreciation of the natural grandeur of the wilderness, including landscape, soundscape, flora and fauna. Commercial services may offer activities that support this purpose by allowing clients to appreciate these wild sights and sounds on their own terms. The opportunity to view these natural wonders often invokes a sense of spirituality within. It allows visitors to experience being a part of something much bigger and more complex, but intangible.

Scenic purpose screening questions:

Sp1 - Do the commercial service activities enhance clients' appreciation of the aesthetics of the wilderness?

Sp2 - Do the commercial service activities invoke opportunities for spirituality and/or allow for deep connections with nature uninhibited by modern civilization?

Scientific

Activities offered by commercial outfitter and guide services may be able to assist with research studying wildlife, vegetation, geology or other aspects of wilderness. "Citizen Science" trips embody this purpose well. Outfitter and guided activities might assist State Fish & Game Departments or other organizations with animal studies, either reporting field observations or providing mandatory or voluntary harvest information. Activities should offer clients the opportunity to be involved in scientific study to the greatest degree possible.

Scientific purpose screening questions:

Scp1 - Do the commercial service activities provide opportunities to assist with scientific studies or involve the scientific process of studying nature?

Educational

A key role of the outfitter and guide is to enhance client enjoyment and use of wilderness. This entails a teacher-student relationship that imparts knowledge and skills from outfitter and guides to clients. This also involves interpretation which attempts to forge emotional connections between clients and nature.

Commercial service activities may realize the educational purpose by educating clientele as to the purpose and value of wilderness. Tongass National Forest policy requires all wilderness commercial service providers to educate their clients about the history, purpose and values of the National Wilderness Preservation System as well as the specific wilderness area visited.

Effective teaching occurs with the realization that wilderness offers an array of educational opportunities spanning the human and natural history of our country. Outfitters and guides can teach their clients skills, arts, history, biology, geology and other topics during wilderness excursions. Teaching occurs by connecting clients to nature, mentoring them and expanding their understanding and appreciation.

Often, outfitter and guides use the art of interpretation to engage with clients about the natural wonders. Interpretation is more than merely providing facts such as the names, elevations and ages of distinct features. Interpretation seeks to forge emotional connections to nature through direct experience that fosters appreciation of natural systems and by encouraging people to record their appreciation through photos, paintings, writings or other expressions.

Educational purpose screening questions:

Ep1 - Do the commercial service activities offer opportunities for education and interpretation about certain values of the Kootznoowoo Wilderness such as cultural, ecological or geological in a way that fosters connections to nature?

Conservation

The conservation purpose may be realized from activities that provide local and global perspectives on conservation issues. The first ensures that activities are conducted in such a way that the wilderness resource remains unimpaired for present and future generations. This can be accomplished by adhering to laws and regulations and by practicing outdoor ethics that protect the wilderness character. Outfitter and guide activities should offer opportunities to not only adhere to regulations and ethics, but provide explanation as to why such regulations and ethics are in place.

Examples of local conservation regulations and ethics include: state statutes that govern hunting and fishing in order to maintain sound populations; permit requirements that prevent overcrowding and resource damage, and the closure of bear hunting within the Pack Creek Zoological Area. Outdoor ethics include: Leave No Trace practices, proper hunting and fishing ethics and proper wildlife viewing ethics.

The second means of realizing the conservation purpose is to educate clients about the valuable and positive role of wilderness on a planet experiencing climate change, mass extinction, biodiversity loss, habitat fragmentation, pollution and other serious plights. The Kootznoowoo Wilderness is recognized by the United Nations Education, Scientific and Cultural Organization as part of an international network of Biosphere Reserves devoted to conservation of nature and scientific research. It provides a standard against which can be measured the effects of man's impact on the environment. Outfitter-guides may offer activities that educate their clients as to how the values of wilderness extend beyond the immediate personal experience to benefit the broader world community and future generations.

Citizen stewardship activities realize the conservation purpose to an even greater degree by participating in wilderness stewardship. These can range from beach clean-ups to treating invasive weeds to trail maintenance to monitoring solitude. There are numerous ways in which commercial service activities can assist agency wilderness stewardship objectives.

Conservation purpose screening questions:

Cp1 - Do the commercial service activities adhere to laws, regulations and outdoor ethics that protect and support wilderness character?

- Cp2 - Do the commercial service activities provide opportunities for clients to learn why certain laws, regulations and ethics are in place for conservation concerns?
- Cp3 - Do the commercial service activities offer opportunities to engage in citizen stewardship projects and/or provide context to larger world conservation concerns?

Historical

Commercial service activities may realize the historical purpose of wilderness in two manners: by assisting with archeological endeavors and/or by connecting people to the human roots of an area. Participating in archeological endeavors should always involve authorized archeologists. It could include projects such as restoring a historical site or methodically inventorying and recording an area for signs such as pictographs or petroglyphs. It should be recognized that it is important to respect local and/or indigenous concerns and that it is inappropriate to publicize certain archeological sites.

Regarding connecting people to their roots, activities can offer clients opportunities to learn about the human history of an area, from the indigenous peoples to explorers to settlers to contemporary locals. History can be taught through lectures, story-telling, books, maps and photos or local experts. Additionally, for those historic sites protected from disturbance which are visited by commercial operations, the outfitter and guides take a stewardship role to preserve the integrity of the site by protecting site qualities and reporting any disturbances.

Historical screening questions:

- Hp1 – Do the commercial service activities offer opportunities to foster a connection between local human habitation and use of the wilderness and its other ecological values?

IV. WILDERNESS CHARACTER

In order to determine need, commercial outfitter and guide service activities must also be compatible with the preservation of wilderness character as defined in the Wilderness Act. This assessment describes the wilderness character for the Kootznoowoo Wilderness and determines whether the outfitter and guide activities are compatible with its preservation for future generations.

This assessment determines compatibility with the Wilderness Act and screens out inappropriate activities; it does not analyze the environmental effects of outfitter and guide activities on wilderness character. That analysis is reserved for an environmental analysis, which will be used to define site specific constraints (i.e. locations, group sizes, service days, time restrictions, etc.) to further define ‘the extent necessary’ to preserve wilderness character.

Wilderness character is a complex idea. It considers a wide variety of qualities, local and national; tangible and intangible. Federal land management agencies charged with administering wilderness have identified five qualities that comprise wilderness character, largely taken from the Wilderness Act Section 2(c):

1. Natural
2. Outstanding Opportunities for Solitude or a Primitive and Unconfined Type of Recreation
3. Undeveloped
4. Untrammeled
5. Other features of value

In order to preserve wilderness character, the characteristics and values of the individual wilderness area must also be further defined and sustained. The characteristics and values which articulate wilderness character for the Kootznoowoo Wilderness, Admiralty Island National Monument are described in ANLCA Section 101(a) and Section 503(c).

Section 101(b)... to preserve wilderness resource values and related recreational opportunities including but not limited to hiking, canoeing, fishing, and sport hunting, within large arctic and subarctic wildlands and on freeflowing rivers;⁹

Section 503(c). Subject to valid existing rights and except as provided in this section, the National Forest Monuments (hereinafter in this section referred to as the “Monuments”) shall be managed by the Secretary of Agriculture as units of the National Forest System to protect objects of ecological, cultural, geological, historical, prehistorical and scientific interest.

This assessment is organized to consider the wilderness character for the Kootznoowoo Wilderness under each nationally defined quality. Like the previous section, each wilderness character quality will conclude with a screening question used to determine the need for commercial service activities.

Natural

The natural quality refers to the condition of the biotic and environmental elements of

⁹ ANILCA, 1980, 16 USC 3101

wilderness:

1. **Natural.** Wilderness ecological systems are substantially free from the effects of modern civilization. This quality is degraded by many things, such as loss of indigenous species, occurrence of nonindigenous species, alteration of ecological processes such as waterflow and fire regimes, effects of climate change, loss of dark skies, and occurrence of artificial sounds. It is preserved or improved, for example, by controlling or removing nonindigenous species or restoring ecological processes.¹⁰

The Kootznoowoo Wilderness includes notable wildlife populations of brown bear, nesting bald eagles, and deer. Also important for the entire ecosystem, some of which are not within wilderness, are marine species such as congregations of humpback whales, and haul-outs for sea lion and harbor seal. The wilderness has exceptionally clean air and water that support the abundance of salmon streams important to the island ecosystem.

However, some challenges to naturalness do exist with one salmon stream at Kanalku Bay with depressed stocks of sockeye salmon due in part to human harvest. Other challenges to naturalness include the presence of 18 known invasive plant species at 162 sites. Nesting birds such as Black Oystercatchers (*Haematopus bachmani*) are sometimes disrupted by boaters and paddlers who visit small islands. Some brown bear are impacted by the availability of human garbage or the displacement caused by temporary encroachment into critical habitat (e.g. estuarine sedge marshes during the spring).

Outfitter and guide services play an important role in protecting natural aspects of Kootznoowoo Wilderness by helping clients to understand wildlife sensitivities, game laws, and best management practices. Outfitter and guides can also prevent disturbance or over-harvest of fish and game species, and they can educate about invasive species.

Natural character screening question:

Nc1 - Are commercial service activities compatible with preserving the natural character of Kootznoowoo Wilderness?

Outstanding Opportunities for Solitude or a Primitive and Unconfined Type of Recreation

As already noted under “Purposes” of Wilderness, Outstanding Opportunities for Solitude or a Primitive and Unconfined Type of Recreation help define wilderness character and are affected by management decisions in the following way:

2. **Solitude or a primitive and unconfined type of recreation.** Wilderness provides outstanding opportunities for solitude or primitive and unconfined recreation. This quality is primarily about the opportunity for people to experience wilderness, and is influenced by settings that affect this opportunity. It is preserved or improved by management actions that reduce visitor encounters and signs of modern civilization inside the wilderness. In contrast, this quality is degraded by agency-provided recreation facilities, management restrictions on visitor behavior, and actions that increase visitor encounters.¹¹

¹⁰ Landres, P., Vagias, W. & Stutzman, S. *Using wilderness character to improve wilderness stewardship*. Park Science, Volume 28, Number 3, Winter 2011-2012, ISSN 1090-9966. National Park Service, U.S. Department of the Interior, Natural Resource Stewardship and Science, Office of Education and Outreach, Lakewood, Colorado.

¹¹ Landres, P., Vagias, W. & Stutzman, S. *Using wilderness character to improve wilderness stewardship*. Park Science, Volume 28, Number 3, Winter 2011-2012, ISSN 1090-9966. National Park Service, U.S. Department of the Interior, Natural Resource Stewardship and Science, Office of Education and Outreach, Lakewood, Colorado.

Kootznoowoo Wilderness contains approximately 1,500 square mile of wildland preserved in its natural state. Opportunities for solitude or a primitive and unconfined type of recreation abound. Certain discrete areas within the wilderness, such as the Pack Creek Zoological Area, marine shoreline zone, and others with developed trails and cabins may offer fewer opportunities for this type of experience. The Monument staff actively monitor for conditions of solitude. These areas under threat of losing this aspect of wilderness character will be considered in future NEPA decision making processes.

Outfitter and guide activities can enhance the wilderness experience quality for visitors, contributing to people's use and enjoyment of wilderness; and outfitter and guides can mitigate visitor impacts leaving such outstanding opportunities unimpaired. Where commercial service activities occur often, in numbers, or with a large footprint (spread out, loud noise, bright lights, lingering exhaust), the outstanding opportunities for solitude or a primitive and unconfined type of recreation quality suffers. As noted in a recent threat analysis prepared for Kootznoowoo Wilderness "If not properly planned and managed, commercially guided recreation activities can negatively affect outstanding opportunities for solitude, or primitive and unconfined experiences, as well as other aspects of wilderness character. "(source: Kootznoowoo Wilderness Information Needs Assessment, 2011)

Outstanding opportunities for solitude or a primitive and unconfined type of recreation character screening questions:

- Oc1 - Are commercial services activities compatible with preserving opportunities for solitude, challenge, decision-making and self-reliance?
- Oc2 – Are commercial service activities compatible with preserving primitive or unconfined type of recreation experiences?

Undeveloped

The undeveloped quality is essential to primeval wilderness which contrasts with those areas where expanding settlement and growing mechanization have occupied and modified the land:

3. **Undeveloped.** Wilderness retains its primeval character and influence and is essentially without permanent improvement or modern human occupation. This quality is influenced by what are commonly called the "Section 4c prohibited uses," that is, the presence of modern structures, installations, habitations, and use of motor vehicles, motorized equipment, or mechanical transport. The removal of structures and not conducting these prohibited uses preserve or improve this quality. In contrast, the presence of structures and prohibited uses degrades this quality, whether by the agency for administrative purposes, by others authorized by the agency, or when there are unauthorized uses.¹²

ANILCA specifically allowed for the continued use of airplanes, motorboats, and snowmachines (during periods of adequate snow cover) for traditional activities and travel to and from villages

¹² Landres, P., Vagias, W. & Stutzman, S. *Using wilderness character to improve wilderness stewardship*. Park Science, Volume 28, Number 3, Winter 2011-2012, ISSN 1090-9966. National Park Service, U.S. Department of the Interior, Natural Resource Stewardship and Science, Office of Education and Outreach, Lakewood, Colorado.

and homesites. These ANILCA exceptions do not alone constitute a degradation of the Undeveloped Quality.¹³

The Kootznoowoo Wilderness is primarily undeveloped, but does have some Forest Service infrastructure to accommodate resource protection, public use and safety. The Kootznoowoo Wilderness contains 28 miles of trail, 14 public use cabins, nine public use shelters, an administrative camp in the PCZA and radio repeater on Windfall Mountain. In addition, other non-Forest Service developments are permitted which include 19 private recreation cabins, one resort, and three communication sites. There are no authorized permanent structures or installations, aside from Thayer Lake Lodge, that support outfitter and guide activities.

Undeveloped character screening question:

Uc1 - Are commercial services activities compatible with preserving the undeveloped character by not relying on developments or motorized equipment and mechanical transport not specifically allowed under ANILCA?

Untrammelled

“Untrammelled” is also defined as “unfettered”:

4. **Untrammelled.** Wilderness is essentially unhindered and free from the actions of modern human control or manipulation. This quality is influenced by any activity or action that controls or manipulates the components or processes of ecological systems inside the wilderness. Management actions that are not taken support or preserve the untrammelled quality, while actions that are taken degrade this quality, even when these actions are taken to protect resources, such as spraying herbicides to eradicate or control nonindigenous species or reducing fuels accumulated from decades of fire exclusion.¹⁴

ANILCA again allows for exceptions to actions that may impair the untrammelled wilderness character quality. Specific exceptions applicable to the Kootznoowoo Wilderness include the taking of fish and wildlife, and fish habitat enhancement. Currently within the wilderness there are three non-commercial activities authorized through ANILCA exceptions that include the Kanalku fish weirs, Kanalku fish habitat enhancement and collaring bears within the PCZA.

For recreation commercial service activities, habituation of bears at the Pack Creek Bear Viewing Area can be constituted as an activity that degrades the untrammelled character. The habituated bears at Pack Creek are a consequence of its history prior to wilderness designation. The viewing publics are required to follow strict procedures for movement and behavior that in turn provides bears an expectation and reduces the natural threat of people. Habituation of the bears at Pack Creek is an objective for a safe viewing experience for both visitors and bears.

In addition, the Pack Creek Bear Viewing area is cooperatively managed by the Forest Service and Alaska Department of Fish & Game. The area is staffed on-site June through September and

¹³ Note, however, that noise, lights and emissions from such vehicles may degrade outstanding opportunities for solitude. Lower profile vehicles are more conducive to preserving wilderness character in this regard. This is not much different than noting that while people may visit wilderness, at a certain magnitude (of numbers or concentration), crowdedness degrades solitude.

¹⁴ Landres, P., Vagias, W. & Stutzman, S. *Using wilderness character to improve wilderness stewardship*. Park Science, Volume 28, Number 3, Winter 2011-2012, ISSN 1090-9966. National Park Service, U.S. Department of the Interior, Natural Resource Stewardship and Science, Office of Education and Outreach, Lakewood, Colorado.

permits are required by visitors. The site has a high level of visitor controls in place for resource protection purposes.

Untrammeled Character question:

Utc1 - Are commercial service activities compatible with preserving unhindered natural processes that are free from human control or manipulation?

Other Features of Value

The quality Other Features of Value pertains to distinct features fundamental to the wilderness character that are not contained within the other qualities:

5. **Other features.** This aspect is based on the last clause of Section 2c in the 1964 Wilderness Act, that a wilderness “may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.” This fifth quality is unique to an individual wilderness based on the features that are inside that wilderness. These features typically occur only in specific locations within a wilderness and include cultural resources, historical sites, paleontological sites, or any feature not in one of the other four qualities that has scientific, educational, scenic, or historical value. While many different types of features could be included, the intent is to include those that are significant or integral to the park and wilderness. Features mentioned in park or wilderness enabling legislation would likely qualify, such as the historic sites in Death Valley Wilderness and volcanoes in Katmai Wilderness. Likewise, significant cultural sites, whether mentioned in enabling legislation or not, occur in most wildernesses and have scientific, educational, scenic, or historical value.¹⁵

One key aspect of Kootznoowoo Wilderness is its rich cultural value as manifested in sites and subsistence uses intrinsic to the history and identity of its people. Both cultural sites and subsistence activities reflect landscape features essential to the character of Kootznoowoo Wilderness. In some cases, known heritage resources have been damaged or removed. Outfitters and guides may contribute to the protection of these resources or they may inadvertently damage them through negligence or abuse. Guides may also impact subsistence priorities if they bring clients in sufficient numbers to compete for limited subsistence resources.

Other Wilderness Character screening question:

Ovc1 - Are commercial service activities compatible with the preservation of cultural values, sites and subsistence activities?

¹⁵ Landres, P., Vagias, W. & Stutzman, S. *Using wilderness character to improve wilderness stewardship*. Park Science, Volume 28, Number 3, Winter 2011-2012, ISSN 1090-9966. National Park Service, U.S. Department of the Interior, Natural Resource Stewardship and Science, Office of Education and Outreach, Lakewood, Colorado.

V. DETERMINATION OF NEED FOR COMMERCIAL RECREATION SERVICE ACTIVITIES

The following section examines the commercial recreation services by activity for the Kootznoowoo Wilderness and finds whether or not they realize public purposes and are compatible with preserving wilderness character. If recreation or other public purposes are realized while wilderness character is upheld, commercial services may be necessary. Each activity was subjected to the public purpose and wilderness character screening questions.

In order for a positive determination of need, the recreation commercial service activity must at a minimum meet the recreation purpose and be compatible with preserving wilderness character. Since this needs assessment focuses on commercial recreation services, it must at a minimum meet the recreation purpose as defined. Appendix 1 provides a compilation of all the screening questions and a matrix that displays the results of the screening questions by activity.

Remote Setting Nature Tours

Remote setting nature tour commercial service activities are necessary in the Kootznoowoo Wilderness.

Hiking, wildlife viewing, photography and sightseeing are popular activities, especially along the marine shorelines of Kootznoowoo Wilderness. Pack Creek Bear Viewing Area is a world class opportunity that offers unparalleled opportunities for being with bears in their natural environment. Scenic vistas and wildlife observations are normally the highlights of such trips, and clients are often given opportunities to contemplate and appreciate nature. The experiences that result often forge deep connections to nature that inspire photographs and art. Guides can help clients understand the regulations and ethics surrounding the viewing of wildlife. Commercially guided trips sometimes involve archaeologists or historians to connect human habitation to the broader ecology. Hiking is a traditional pursuit that requires elements of risk and challenge, especially off-trail. It encourages self-reliance and helps strengthen independent decision-making. Hiking guides can also help preserve wilderness through avoidance of motorized equipment and mechanical transport, and by not competing for subsistence resources. Remote setting nature tour commercial service activities fulfill the public purposes and are compatible with preserving the wilderness character as defined by the Wilderness Act.

Floatplane Landing Tours

Floatplane landing tour commercial service activities are not necessary in the Kootznoowoo Wilderness.

Floatplanes are a common and allowed method of transport for recreation use on the Tongass NF. However, the authorization of floatplane landing tours on the Tongass is limited and has not been authorized within the Kootznoowoo Wilderness. A floatplane landing tour is defined in this assessment as a day-use activity that predominantly involves viewing natural features by air and landing once or multiple times within the wilderness and returning back to its point of origin. This activity does not include point-to-point floatplane services that are provided as an ancillary

service to other guides who are permitted for other activities or for services to individuals who hire these services to provide access to these areas for their recreation needs; such as using a cabin, or shuttle services to and from a community.

The determination of no need was concluded based on;

- 1) Failure to realize the recreational purposes for the Kootznoowoo Wilderness (Rp1-Challenge, Rp2-Traditional);
- 2) Failure to realize the scenic purposes for the Kootznoowoo Wilderness (Sp2-connections);
- 3) Incompatibility with preserving wilderness character per Wilderness Character Screening Questions Oc1-Solitude and Oc2-Primitive.

This activity primarily accesses freshwater lakes within the Kootznoowoo Wilderness. The vast majority of freshwater lakes have developed trail access and public recreation cabins that do not require an extraordinary degree of specialized skill, equipment and challenge that inhibits access and enjoyment of the lakes by the majority of the general public (question Rp1). In addition, this activity is not considered a traditional wilderness pursuit within the Kootznoowoo Wilderness, as it predominantly involves viewing natural features from the air and landing for only short periods of time within the wilderness (question Rp2). Therefore, this commercial service activity is not necessary to achieve the recreation public purposes of the Wilderness Act.

This activity generally does not allow opportunities for visitors to forge deep connections with nature uninhibited by modern civilization (question Sp2). The act of viewing the wilderness from an aircraft and spending relatively short periods of time on the ground, within the landscape and soundscape represents an activity predominantly inhibited by modern civilization (flying) and does not fulfill the scenic purposes of wilderness.

Floatplane landing tours are not compatible with preserving the wilderness character of outstanding opportunities for solitude or a primitive and unconfined type of recreation, specifically Wilderness Character Screening Question Oc1 and Oc2. This activity occurring on lakes that are predominantly accessed by visitors from traditional wilderness means, hiking and paddling, degrades opportunities for those visitors to experience solitude and primitive recreation. Therefore this commercial service activity is not necessary due to its incompatibility with preserving outstanding opportunities for solitude or a primitive and unconfined type of recreation.

Camping

Camping commercial service activities are necessary in the Kootznoowoo Wilderness.

Outfitted and guided camping services are currently a small, but important, component of commercial use in the Kootznoowoo Wilderness. The majority of camping services come in connection with multiple day marine based kayak trips along the shoreline. Camping involves skills that embrace traditional techniques and require elements of risk and challenge, especially for those new to the sport. It encourages self-reliance and helps strengthen independent decision-making. Scenic vistas and wildlife observations are normally the highlights of such trips, and

clients are often given opportunities for quiet time to contemplate and appreciate nature. The multiple day experiences that result often forge deep connections to nature that inspire photographs and art. Guides can help clients understand the regulations and ethics surrounding the viewing of wildlife and the requirements of camping. Outfitted and guided camping services may be necessary at Forest Service shelters and cabins where access is difficult and public use of the facilities is low.

Freshwater Fishing

Freshwater fishing commercial service activities are necessary in the Kootznoowoo Wilderness.

Fishing guides in general can help realize the purposes of wilderness in most locations of Kootznoowoo Wilderness while preserving wilderness character. Historically guided fresh water fishing activities have largely been day-use accessed from the confluence with marine waters. Fishing is a traditional wilderness pursuit where guides can teach skills and connect clients to nature in meaningful and memorable experiences that involve self-reliance. Fishing groups are generally smaller and they seek solitude in order to avoid competition with others. Fishing groups often spend more time in wilderness which enhances their appreciation of scenery and affords more opportunity to study nature. Guides often practice catch-and-release fishing, uphold state regulations pertaining to the harvest of fish and they must report results to State officials who manage the harvest and consider effects upon populations. Fishing guides do not typically realize historical purposes of wilderness in that clients don't study historic sites under agreement with archaeologists.

Hunting

Commercial hunting activities are necessary in the Kootznoowoo Wilderness.

Brown bear and deer guides can realize most of the public purposes while preserving wilderness character. Non-resident bear hunters are required under state regulation to be accompanied by a guide or resident family member. Kootznoowoo features accessible terrain that affords Outstanding Opportunities for Solitude or a Primitive and Unconfined Type of Recreation to hunters. Hunting is a traditional pursuit that requires ample solitude to watch, track and pursue ranging game. Skills developed during hunts often require challenging decision making and self-reliance. Binoculars and viewing devices are normally used and clients have abundant opportunities to enjoy scenery and to study nature. Guides uphold state regulations pertaining to the pursuit and harvest of game and they must report results to State officials who manage the harvest and consider effects upon populations. They have the opportunity to involve clients in studies and connect clients to nature through education described in their operating plans. Hunting guides do not help realize historical purposes of wilderness in that clients don't study historic sites under agreement with archaeologists.

APPENDIX 1: Screening questions and conclusions of screening questions sorted by activity

Public Purpose Screening Questions:

- Rp1 - Do the commercial service activities require an extraordinary degree of specialized skill, equipment and challenge that inhibits access and enjoyment by the majority of the general public?
- Rp2 - Do the commercial services align with recreation pursuits that are traditional within the Kootznoowoo Wilderness?
- Sp1 - Do the commercial service activities enhance clients' appreciation of the aesthetics of the wilderness?
- Sp2 - Do the commercial service activities invoke opportunities for spirituality and/or allow for deep connections with nature uninhibited by modern civilization?
- Scp1 - Do the commercial service activities provide opportunities to assist with scientific studies or involve the scientific process of studying nature?
- Ep1 - Do the commercial service activities offer opportunities for education and interpretation about certain values of the Kootznoowoo Wilderness such as cultural, ecological or geological in a way that fosters connections to nature?
- Cp1 - Do the commercial service activities adhere to laws, regulations and outdoor ethics that protect and support wilderness character?
- Cp2 - Do the commercial service activities provide opportunities for clients to learn why certain laws, regulations and ethics are in place for conservation concerns?
- Cp3 - Do the commercial service activities offer opportunities to engage in citizen stewardship projects and/or provide context to larger world conservation concerns?
- Hp1 - Do the commercial service activities offer opportunities to foster a connection between local human habitation and use of the wilderness and its other ecological values?

Wilderness Character Screening Questions:

- Nc1 - Are commercial service activities compatible with preserving the natural character of Kootznoowoo Wilderness?
- Oc1 - Are commercial services activities compatible with preserving opportunities for solitude, challenge, decision-making and self-reliance?
- Oc2 - Are commercial service activities compatible with preserving primitive or unconfined type of recreation experiences?
- Uc1 - Are commercial services activities compatible with the preserving the undeveloped character by not relying on developments or motorized equipment and mechanical transport not specifically allowed under ANILCA?
- Utc1 - Are commercial service activities compatible with preserving unhindered natural processes that are free from human control or manipulation?
- Ovc1 - Are commercial service activities compatible with the preservation of cultural values, sites and subsistence activities?

	Remote Setting Nature Tours	Floatplane Landing Tours	Camping	Freshwater Fishing	Hunting
Public Purposes					
Recreational					
Rp1-Challenge	Yes	No	Yes	Yes	Yes
Rp2-Traditional	Yes	No	Yes	Yes	Yes
Scenic					
Sp1-Appreciation	Yes	Yes	Yes	Yes	Yes
Sp2-Spiritual	Yes	No	Yes	Yes	Yes
Scientific					
Scp1-Study	Yes	Yes	Yes	Yes	Yes
Educational					
Ep1-Connections	Yes	Yes	Yes	Yes	Yes
Conservation					
Cp1-Rules/ethics	Yes	Yes	Yes	Yes	Yes
Cp2-Values	Yes	Yes	Yes	Yes	Yes
Cp3-Stewardship	Yes	Yes	Yes	Yes	Yes
Historical					
Hp1-Connections	Yes	Yes	Yes	Yes	Yes
Wilderness Character					
Natural					
Nc1-Natural	Yes	No	Yes	Yes	Yes
Outstanding					
Oc1-Solitude	Yes	No	Yes	Yes	Yes
Oc2-Primitive	Yes	No	Yes	Yes	Yes
Undeveloped					
Uc1-Undeveloped	Yes	Yes	Yes	Yes	Yes
Untrammeled					
Utc1-Untrammeled	Yes	Yes	Yes	Yes	Yes
Other					
Ovc1-Cultural	Yes	Yes	Yes	Yes	Yes
Determination of Need	Yes	No	Yes	Yes	Yes