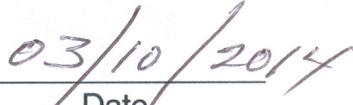


Determination of Need for Commercial Services  
Pleasant/Lemesurier/Inian Islands Wilderness Area  
Hoonah Ranger District  
Tongass National Forest



Inian Islands - gcisneros

  
Arthur Burbank, Hoonah District Ranger

  
Date

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## I. Introduction

The Hoonah Ranger District (HRD) has developed this needs assessment to determine the types of commercial outfitter and guide activities that could take place in the Pleasant / Lemesurier / Inian Islands (PLI) Wilderness. A needs assessment is 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 areas. This document is tiered to the 2008 Tongass Land and Resource Management Plan (Forest Plan) and the *Determination of Need and Extent of Commercial Uses within Wilderness Areas on the Tongass National Forest* (USDA 2007).

As identified in The Wilderness Act of 1964: "Commercial services may be performed with 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".

Public need is identified by the Forest Service for activities that are deemed essential or required for the well-being of the public and in order to meet the intent of the Forest Service's mission to manage and protect resources, provide for public safety, and provide high-quality public recreation services. Market-generated demand for conducting outfitting and guiding activities does not, by itself, constitute a need for commercial services. Identification of need also considers how an outfitter and guide operation can contribute to meeting Forest Plan management objectives.

Outfitters and guides can serve as important partners for the Forest Service. In particular, guides provide wilderness awareness and leave no trace education. Outfitters and guides can also assist with monitoring activities, such as reporting invasive plants and illegal activities, which help the Forest Service achieve a higher level of wilderness stewardship. For visitors who might not otherwise be exposed through typical education and outreach efforts, outfitters and guides can help build support for Wilderness preservation.

A commercial needs assessment is not a decision document subject to environmental analysis. Rather, it is an analytical tool. A separate analysis, known as a visitor capacity, will be done in conjunction with this needs assessment to identify the recreational capacity (for both guided and unguided use) of the PLI Wilderness. The decision to allocate a portion of the visitor capacity to outfitted and guided visitors, as well as the decision to issue or renew outfitter and guide permits, will be accomplished through an environmental analysis in compliance with the National Environmental Policy Act (NEPA).

Existing outfitter and guide activities occurring in the PLI Wilderness are authorized under the Shoreline Outfitter/Guide Record of Decision (ROD) and Final Environmental Impact Statement (FEIS; 2004). This decision is currently under review.

## II. Wilderness Management Direction

This document includes excerpts for wilderness management from the following resources (see Appendix 1):

- The Wilderness Act of 1964
- Alaska National Interest Lands Conservation Act of 1980 (ANILCA)

- Title 36 - Code of Federal Regulations
- USDA Forest Service Strategic Plan FY 2007-2012
- Forest Service Chief's 10-Year Wilderness Stewardship Challenge
- Forest Service Manual 2320, Wilderness Management
- Tongass National Forest, Land and Resource Management Plan, 2008 (Forest Plan)
- Recreation Opportunity Spectrum (ROS)
- Forest Service Special Use Permit Stipulations for Outfitting and Guiding on National Forest System lands, Tongass National Forest, 2012.

### III. Pleasant/Lemesurier/Inian Islands (PLI) Wilderness

#### Area Description

In 1990 Congress designated 23,096 acres located north of Hoonah as the Pleasant/Lemesurier/Inian Islands Wilderness. These scenic islands are located along the Icy Strait corridor near the entrance to Glacier Bay National Park and Preserve, north of the City of Hoonah.

Pleasant Island, the easternmost island, lies fairly flat with dense forest and vast muskegs; its highest point, The Knob, is at approximately 600 feet. At least two of the island's lakes and three of its streams hold fresh water. It is about two miles from the City of Gustavus across Icy Passage and accessible by boat. Residents hunt and gather with success here.

Lemesurier Island, the next island west is mostly rolling terrain with one peak reaching 2,180 feet above sea level--high enough to claim sub-alpine habitat. It is densely forested with several freshwater streams and small lakes. Hoonah Ranger District maintains a primitive trail that leads to a lake above Jacks Cove. This lake has no outlet and is surrounded by carbonate bedrock, which suggests a viable karst system. There are two parcels of private land on this island.

The Inian Islands, westernmost of this Wilderness are made up of four main islands with four smaller satellites. A short distance north off the Inian Peninsula and the community of Elfin Cove, the "Inians" rise to about 1,000 feet on the largest island. Substantial tree cover provides habitat for deer and small mammals.

#### Statement Defining the Wilderness Character of the PLI Wilderness Area

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. These qualities as they relate to PLI Wilderness include:

- **Untrammeled** – *The Wilderness is essentially unhindered and free from modern human control or manipulation.* The existing outfitter/guide activities for Remote Setting Nature Tours and Camping have not developed significant impacts and have not altered natural systems in the PLI Wilderness area.
- **Natural** - *Wilderness ecological and evolutionary systems are substantially free from the effects of modern civilization.* The current outfitting/guiding activities do not manipulate vegetation, soils, air quality, or other physical and biological components of this wilderness.
- **Undeveloped** - *Wilderness retains its primeval character and influence and has minimal evidence of modern human occupation or modification.* The existing outfitter/guide activities do not establish permanent structures and guides practice Leave-No-Trace principles.
- **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 PLI Wilderness area is located along the Icy Strait corridor between the communities of Hoonah, Gustavus, and Elfin Cove. This corridor receives continuous boat and plane traffic. Once ashore, these wilderness islands are relatively free of human encounters and guided hiking and camping activities expose clients to outstanding opportunities for a primitive recreation experience.

## Existing Condition - Commercial Visitor Use

Like many of the wilderness areas in Alaska, PLI Wilderness is only accessible by float plane or boat. There is no single departure or access point for this Wilderness area. Current recreation use consists of hunting, visiting the shoreline beaches, hiking, and camping. Boaters skirt the islands traveling between the communities of Juneau, Hoonah, Gustavus, Elfin Cove, and Pelican. Much of the use in PLI Wilderness consists of visitors from fishing boats and pleasure crafts stopping on accessible beaches when weather permits.

Commercial outfitters and guides are permitted to use the PLI Wilderness and their activities provide services for forest visitors that are unfamiliar with Southeast Alaska's wilderness. Outfitters and guides are required to submit use reports annually that identify the use location, type of use, number of clients, number of groups, and length of stay at each location. From this information, the number of service days used at each location is calculated. A service day is defined as a day, or any part of a day, on National Forest System lands for which an outfitter or guide provides goods or services, including transportation, to a client. Actual use reports provide an effective mechanism to track and monitor outfitter and guide use in wilderness.

Currently the Hoonah Ranger District has no means to track the number of private users that recreate in this wilderness area.

A review of the past and current outfitter/guide use, as well as the potential of additional use, was used as a foundation for this needs assessment. Based on past and potential future use, the following outfitter/guide activities were considered for this needs assessment:

- Remote Setting Nature Tours
- Camping
- Freshwater Fishing
- Big Game Hunting

Table 1 shows the permitted outfitter/guide use activities and actual use that occurred on PLI Wilderness between 2007 to 2012.

Table 1. Authorized Outfitter/Guide Activities and Actual Use -- PLI Wilderness (2007-2012).							
Activity	Actual Use – Service Days						
	2007	2008	2009	2010	2011	2012	TOTAL
Remote Setting Nature Tours	174	158	78	91	124	207	832
Camping	0	0	0	10	0	0	10
Freshwater Fishing	0	0	0	0	0	0	0
Big Game Hunting	0	0	0	0	0	0	0
<b>TOTAL</b>	<b>174</b>	<b>158</b>	<b>78</b>	<b>105</b>	<b>124</b>	<b>207</b>	<b>842</b>
<sup>1</sup> A service day is defined as a day, or any part of a day, on National Forest System lands for which an outfitter or guide provides goods or services, including transportation, to a client.							

The Pleasant/Lemesurier/Inian Islands Wilderness area is split between Guide Use Area (GUA) 04-11 and 04-16. GUA 04-11 includes Pleasant Island. GUA 04-16 is split into four sub-units – 04-16A, 04-16B, 04-16C, and 04-16D. GUA 04-16D includes Lemesurier and Inian Islands.

Authorizations for big game hunting and freshwater fishing activities are generally permitted for individual Guide Use Areas (GUA). Each GUA may include a portion of designated wilderness. Although big game hunters and fishing guides may be permitted to operate in a particular GUA that may include a portion of a wilderness area, these activities take place where fish and game are more likely to occur.

No big game hunting or freshwater fishing activities have taken place on PLI Wilderness in the last five years. There are no anadromous fish streams on the islands and brown bear do not inhabit the islands. Though there may be an occasional transient brown bear on the islands that make up PLI Wilderness, there is an extremely low likelihood of conducting a viable hunt for brown bear within the Wilderness. Successful brown bear hunts and freshwater fishing activities take place on other areas of the district. There are, however, healthy populations of Sitka black-tailed deer on the three main islands of the PLI Wilderness and resident deer hunts are successful. The Forest Service has not received proposals for commercial deer hunting activities in PLI Wilderness.

Table 1 indicates that the only commercial activities to take place in this wilderness area are Remote Setting nature Tours (RSNT) and Camping. RSNT includes day use activities such as hiking, exploring, wildlife viewing, picnicking, photography, etc.

Table 2 shows all guides authorized to operate in the PLI Wilderness from 2007 to 2012. This table also shows the actual use for each guide and the area of operation by Guide Use Area (GUA).

Table 2. Outfitter/Guides Authorized to Operate on PLI Wilderness (2007-2012)							
GUIDE	GUA	ACTUAL USE -- Service Days					
		2007	2008	2009	2010	2011	2012
Chichagof Charters	04-16	0	0	0	0	0	0
Tok River Outfitters	04-11	0	0	0	0	0	0
Ken Schoonover	04-11, 04-16	0	0	0	0	0	0
Whisper Marine Charters	04-11, 04-16	0	0	0	0	0	0
<b>Spirit Walker Expeditions of Alaska</b>	<b>04-11, 04-16</b>	<b>174</b>	<b>158</b>	<b>78</b>	<b>101</b>	<b>118</b>	<b>207</b>
Alaska Mtn. Guides	04-11	0	0	0	0	0	0
South Passage Outfitters	04-16	0	0	0	0	0	0
<b>Hobbit Hole Guest House</b>	<b>04-16</b>	X	X	X	<b>4</b>	<b>6</b>	0
Eagle Charters	04-16	X	X	X	X	0	0
Cove Lodge	04-11, 04-16	0	0	0	0	0	0
Icy Strait Adventures	04-11, 04-16	0	0	0	0	X	X
Glacier Bay Sport Fishing	04-11, 04-16	0	0	0	X	X	X
<sup>1</sup> A service day is defined as a day, or any part of a day, on National Forest System lands for which an outfitter or guide provides goods or services, including transportation, to a client.							

- Actual Use is based on outfitter/guide submitted use reports
- X = guide was not under permit to operate on National Forest System lands
- 04-16 – designated Guide Use Area, includes Lemesurier and Inian Islands
- 04-11 – designated Guide Use Area, includes Pleasant Island

Table 2 shows all outfitter/guides authorized to operate on PLI Wilderness. According to the outfitter/guide submitted actual use records, all RSNT activities took place on Pleasant Island. There were only 10 camping service days recorded from 2007-2012. All camping activities took place on Inian Islands.

## IV. Evaluation 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 demand for conducting outfitting and guiding activities does not, by itself, constitute a need for commercial services.

The criteria used for evaluating the need for outfitter/guide activities in the management of the PLI Wilderness include:

Skills and Equipment – outfitter/guide skills and equipment are needed by the public because of one or more of the following:

- Specific skills required for activities appropriate for the area require substantial time and/or talent to learn.
- 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 time and money.
- 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 the activity.

Knowledge – guide knowledge of the wilderness resource and the activity area is needed by the public, especially nonresident visitors, in order to safely 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. This criterion is not meant to diminish the wilderness values of self-reliance or the opportunity to challenge one's self or experience a degree of risk.

Outfitter/Guide Demand and Utilization – are current outfitted/guide activities booked or over-booked, indicating a larger interest in the service?

Management Objectives – outfitter/guides help the Forest Service meet management objectives to: 1) provide opportunities for special populations, which include persons with disabilities and the elderly, to access certain areas and to participate in recreational and educational activities and , 2) provide opportunities for public use, enjoyment, and understanding of the wilderness through experiences that depend upon a wilderness setting and are consistent with management of the area as wilderness.

Level of Use and Conflict – conflicts between all users. The extent to which already authorized use days or capacity exists for existing permittees to fill the need. What is the compatibility of commercial and general public use, and the amount of use and social capacity within a given area of the Wilderness? Are trail systems and use patterns (congestion and number of encounters) a potential problem? Is there a temporal congestion pattern—weekend use vs. weekday use, day vs. 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 amount of interference an outfitter/guide operation will have with the natural biological and physical processes of the wilderness?

Dependency on Wilderness for Activities – the extent to which the proposed service cannot be offered on non-wilderness national forest lands including private or other public lands. Some examples of dependence could be: 1) trips in which solitude or unconfined, primitive recreation are the central components of the experience; and 2) visits to ecosystems, geological features, or physical resources found predominantly in wilderness for recreational, scientific, or educational purposes.

Wilderness Character – would outfitter/guide activities degrade wilderness character to an unacceptable level? Alternatively, could outfitter/guide activities improve wilderness character?

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 the PLI Wilderness area.

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 limited to a select few?

## V. Evaluation of Activities Authorized for PLI Wilderness Area.

To determine the types of commercial outfitting and guiding activities that could take place in the Pleasant/Lemesurier/Inian Islands Wilderness area, the key criteria used to establish public need were evaluated for the following authorized activities:

- Remote Setting Nature Tours
- Camping
- Freshwater Fishing
- Big Game Hunting

Each criterion was rated based on existing data and information compiled at the Hoonah Ranger District.

Table 3. Evaluation Process for Determination of Public Need	
<b>Remote Setting Nature Tours (RSNT)</b>	
<b>Criteria</b>	<b>Rating Summary</b>
Skills and Equipment	High – expert skills and equipment required, high cost for equipment
Knowledge	High – local knowledge required, marine navigation and extreme weather
Safety	High-Moderate – experienced guides required to provide for safety of visitors
Management Objectives	High – guides required
Demand and Utilization	High – continued demand for RSNT and Camping activities.
Level of Use and Conflict	Low – no conflicts by other outfitter/guides
Land Capability	Low – guides emphasize Leave No Trace ethics
Wilderness Dependency	High – proximity to Gustavus (base of operations) for RSNT and Camping activities. Remote wilderness character required for successful trips
Wilderness Character	Low – existing use is low impact
Forest-wide Availability	Low – proximity to Gustavus (base of operations), desired use
Public Purpose	Moderate – only select groups can afford and participate
<b>Camping</b>	
<b>Criteria</b>	<b>Rating Summary</b>
Skills and Equipment	High – expert skills and equipment required, high cost for equipment
Knowledge	High – local knowledge required due to dangerous shoreline and extreme weather
Safety	High-Moderate – guides required to provide for safety of visitors and extended trip lengths
Management Objectives	High – guides required
Demand and Utilization	Moderate – low demand for camping
Level of Use and Conflict	Low – no conflicts by other outfitter/guides
Land Capability	Low – guides emphasize Leave No Trace ethics
Wilderness Dependency	High – wilderness camping and practicing leave no trace is wilderness dependent honing wilderness skills.
Wilderness Character	Low – existing use is low impact
Forest-wide Availability	Low – proximity to Gustavus (base of operations), desired use
Public purpose	Moderate – only a select group will participate

<b>Freshwater Fishing</b>	
<b>Criteria</b>	<b>Rating Summary</b>
Skills and Equipment	High – expert skills and equipment required, high cost for equipment
Knowledge	High – local knowledge required due to dangerous shoreline and extreme weather conditions
Safety	High-Moderate – guides required to provide for safety of visitors
Management Objectives	High – guides required
Demand and Utilization	Low – no anadromous fish streams, lakes do not contain game fish
Level of Use and Conflict	Low
Land Capability	Low –
Wilderness Dependency	Low – fishing is not dependent on wilderness
Wilderness Character	Low
Forest-wide Availability	Moderate – several non-wilderness fish stream exist
Public Purpose	Low – fishing would address the purpose of recreation and scenic qualities, but only a select group will participate
<b>Big Game Hunting</b>	
<b>Criteria</b>	<b>Rating Summary</b>
Skills & Equipment	High – expert skills and equipment required; equipment can be expensive; habitat not known to produce trophy animals
Knowledge	High – local knowledge required due to dangerous shoreline and extreme weather conditions
Safety	High-Moderate – guides required to provide for safety of visitors
Management Objectives	High – guides required
Demand & Utilization	Low – no requests for big game hunts. No bear population on PLI Wilderness
Level of Use & Conflict	Low
Land Capability	Low – relatively small area and big game tend to require a larger territory.
Wilderness Dependency	Low
Wilderness Character	Low
Forest-wide Availability	Moderate: productive hunting areas are available in non-Wilderness areas
Public Purpose	Moderate: guides support recreation purposes of hunting but generally only a select group will participate

## VI. Determination of Need for Commercial Services

### **Special Uses Management Direction**

To control resource impacts from increased use or to address concerns due to competition between outfitter and guide groups and other unguided forest users, the Forest Service developed mitigation measures. These mitigation measures are included with all outfitter/guide special use permits as special stipulations and therefore become part of the permit. Failure to adhere to the stipulations would be a violation of the terms in the special use authorization and could lead to the termination of the permit. These mitigation measures evolve in response to current conditions and trends and will continue to be used as a management tool to respond to impacts or conflicts that become apparent during the monitoring efforts. The current special use stipulations are listed in Appendix 2.

### **Recreation Opportunity Spectrum (ROS)**

The Recreation Opportunity Spectrum (ROS) is a system for inventorying recreation experience opportunities into seven classes. Each class is defined in terms of the degree to which certain recreation opportunities are possible based on the extent to which 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. There are seven classes identified within the Tongass Land Management Plan. The PLI Wilderness area consists of Semi-Primitive Motorized and Semi – Primitive Non-Motorized ROS Classes. These ROS Classes are defined in Appendix 3.

### **Assumptions and Evaluation Criteria**

#### **Assumptions**

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

- Some people would not visit the PLI Wilderness without an outfitter or guide because they lack the skills, knowledge, equipment, or ability to do so on their own.
- There will be a continued demand for special use permits to authorize outfitter/guide operations in the PLI Wilderness area. Access points and use locations are limited to safe harbors and accessible beaches. Increased demand and use levels at popular locations are issues to consider.
- Overall visitor use is expected to remain at current levels or continue to increase (Forest Plan Record of Decision 2008). There may also be shifts in use patterns (timing and location) and user types (hikers, backpackers, day users, etc.).
- Much of the use on PLI Wilderness is incidental. Visitors from fishing boats and pleasure crafts stop on accessible beaches when weather permits.
- Conflicts between outfitter/guide operations and the non-outfitted/guided public have the potential to occur if overall use increases.

## Evaluation Criteria

The following criteria were used to determine the public need for commercial outfitter and guide services in PLI Wilderness:

- Wilderness Dependence
- Potential Impacts to Wilderness Character
- Knowledge, Skills, and Equipment
- Visitor Safety
- Outfitter and Guide Demand and Utilization
- Public Purpose

### Wilderness Dependency

The Forest Plan directs managers to “Avoid authorizing uses that are not dependent upon Wilderness resources or uses for which reasonable alternative locations exist outside of Wilderness” (3-12). Determination of need is based on the extent to which the proposed service can or cannot be offered on non-wilderness National Forest System (NFS) lands or non-NFS lands, including private or other public lands. Some examples of wilderness dependence could include 1) trips in which solitude or primitive and unconfined recreation are the central components of the experience; and 2) visits to ecosystems, geological features, or physical resources found predominantly in wilderness for recreational, scientific, or educational purposes.

### Potential Impacts to Wilderness Character

Determination of need is based on the extent to which outfitter and guide activities have the potential to degrade or improve wilderness character. The Wilderness Act of 1964 specifies that “each agency administering any area designated as Wilderness shall be responsible for preserving the Wilderness character of the area (Section 2(c)). Section 2(c) of the Act also defined four qualities of wilderness character that managers shall try to preserve, including the following:

- *Untrammeled – The Wilderness is essentially unhindered and free from modern human control or manipulation.* 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. Outfitter and guide activities generally do not affect the untrammeled quality of wilderness character.
- *Natural - Wilderness ecological and evolutionary systems are substantially free from the effects of modern civilization.* This quality describes the ecological effects of human activities on vegetation, soils, air quality, or other physical and biological components of Wilderness. Outfitter and guide activities have the potential to impact the natural qualities of wilderness character.
- *Undeveloped - Wilderness retains its primeval character and influence and has minimal evidence of modern human occupation or modification.* This quality describes the effects of structures, habitations, or other evidence of human presence or occupation. Outfitter and guide activities that require the use of temporary or permanent structures, or create noticeable impacts on the ground, have the potential to impact the undeveloped qualities of wilderness.

- 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.* Outfitter and guide activities have the potential to impact opportunities for solitude in wilderness.

### Knowledge, Skills, and Equipment

Determination of need is based on the degree to which outfitter and guide services are needed by the public because 1) the specific skills required for activities appropriate to the area require substantial time and/or talent to learn; 2) participating in the activity requires acquisition and use of expensive, specialized equipment for which the public could not, or ordinarily would not, expend the time and money; and 3) the skills, knowledge, and equipment required are so unique that the use of an outfitter or guide is almost a prerequisite if area visitors are to have the opportunity to participate safely in the activity. Outfitters and guides possess knowledge about the local area and wilderness resource that may be required to safely access the area and minimize resource damage and visitor conflicts. This knowledge may include knowing where, and by what method, to best access and travel through an area.

### Visitor Safety

Determination of need is based on the degree to which outfitter and guide services are needed by the public because of the special skills, knowledge, and equipment needed for a reasonable level of visitor safety. Without guide assistance, members of the public and visitors to the area may seriously endanger their health or lives, or would not visit the wilderness area due to safety concerns. Outfitter and guide services should not diminish other wilderness visitors' opportunities to experience a degree of challenge and risk, and/or sense of self-reliance.

### Outfitter and Guide Demand and Utilization

Determination of need is based on the amount of demand that exists for an outfitter and guide activity and the extent to which the activity is already authorized.

### Public Purpose

The Wilderness Act specifies that "Wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use" (Section 4(b)). Determination of need is based on the extent to which guide services help fulfill these public purposes of wilderness. Determination of need is based on the degree to which outfitters and guides help the Forest Service meet management objectives to 1) provide opportunities for public use, enjoyment, and understanding of the wilderness through experiences that depend upon a wilderness setting and are consistent with management of the area as wilderness, and 2) provide opportunities for special populations, including persons with disabilities and the elderly, to access certain areas and participate in recreational and educational activities.

## VII. Determination of Need for Commercial Services by Activity

### **Activities Considered**

A review of past and current outfitter and guide use in the area surrounding the PLI Wilderness provided a starting point for this needs assessment. Based on past use, the following commercial activities were considered:

- Remote Setting Nature Tours
- Camping
- Freshwater Fishing
- Big Game Hunting

This assessment may be revised in the future if recreation use trends and demand for new outfitter and guide services is identified. The following individual assessments for each activity include:

## Remote Setting Nature Tours

Evaluation Criteria	Determination of Need
Wilderness Dependency	Opportunities for remote setting nature tours exist in the non-wilderness portion of the Hoonah Ranger District and surrounding areas of the Tongass National Forest. Wilderness, however, provides the remote wild land setting desired for this type of activity. PLI Wilderness provides this setting for guided groups originating from Hoonah and Gustavus.
Potential Impact to Wilderness Character	Remote setting nature tours occurring in the PLI Wilderness are boat-based and use is concentrated on beaches and established trails. As a result, this activities results in minimal impacts to vegetation, soil, and water resources. There is a potential for guided groups to impact opportunities for solitude in the wilderness, particularly if the groups are large and use is authorized in popular locations. Motorized boat traffic along adjacent waterways also has the potential to reduce opportunities for solitude in the PLI Wilderness. Guided remote setting nature tours do not affect the untrammled and undeveloped qualities of wilderness character.
Knowledge, Skills, and Equipment	Visitors must access the PLI Wilderness using motorized boats or float planes. Outfitters and guides can provide the skills, equipment, and knowledge required to safely access and enjoy the Wilderness.
Visitor Safety	Southeast Alaska's weather conditions and tidal fluctuations can be extreme throughout the year. Exposure to wind and cold weather poses a threat to visitor safety. Wildlife encounters also pose a risk to safety, although the PLI Wilderness does not provide suitable bear habitat so the risk of encounters is minimal.
Outfitter and Guide Demand and Utilization	There is demand for guided remote setting nature tours in the PLI Wilderness. The beaches in PLI Wilderness provide desirable recreation settings for this type of activity. PLI Wilderness is also located in close proximity to the City of Gustavus, which is a base of operations for guides leading remote setting nature tours. (Document could use some clarification earlier about where the visitors originate? I assumed the use was from the Icy Strait cruise ships?)
Public Purpose	Guided remote setting nature tours provide an opportunity for the visiting public to safely access and enjoy the PLI Wilderness for recreational pursuits. Outfitters and guides providing remote setting nature tours emphasize Leave No Trace skills and outdoor ethics. Remote setting nature tours depend on a wild land setting and are consistent with management of the area as wilderness.

In summary, guided remote setting nature tours occurring in PLI Wilderness are primarily boat-based and use is concentrated on beaches and established trails. These activities result in minimal impacts to vegetation, soil, and water resources. Authorized outfitters and guides emphasize Leave No Trace skills and outdoor ethics. Remote setting nature tours depend on a wild land setting and are consistent with management of the area as wilderness.

There is a potential for guided groups to impact opportunities for solitude in the wilderness, particularly if the groups are large and use is authorized in popular locations. Group size will be limited to twelve and permit stipulations will be designed to reduce potential conflicts with unguided visitors.

There is demand for guided remote setting nature tours in PLI Wilderness. The beaches in PLI Wilderness provide desirable recreation settings for this type of activity. PLI Wilderness is also located in close proximity to the communities of Gustavus and Hoonah. Outfitters and guides can provide area visitors with the skills, equipment, and knowledge required to safely access and enjoy the Wilderness. There is a need for commercially-guided remote setting nature tours in PLI Wilderness.

## Camping

Evaluation Criteria	Determination of Need
Wilderness Dependence	Opportunities for guided camping exist in the non-wilderness portion of the Hoonah Ranger District and surrounding areas of the Tongass National Forest. Wilderness, however, provides the remote wild land setting desired for this type of activity. PLI Wilderness provides this setting for guided groups originating from Hoonah and Gustavus. Wilderness also provides an opportunity for guided visitors to practice Leave No Trace camping skills and learn about outdoor ethics.
Potential Impact to Wilderness Character	Guided camping generally occurs on the beaches along the shoreline of PLI Wilderness and results in minimal impacts to vegetation, soil, and water resources. There is a potential for guided groups to impact opportunities for solitude in the wilderness, particularly if the groups are large or use is authorized in popular locations. Motorized boat traffic along adjacent waterways also has the potential to reduce opportunities for solitude. Guided camping tours do not affect the untrammeled and undeveloped qualities of wilderness character.
Knowledge, Skills, and Equipment	Visitors must access the PLI Wilderness using motorized boats or float planes. Outfitters and guides can provide the skills, equipment, and knowledge required to safely access and enjoy the Wilderness. Guides also provide the skills, equipment, and knowledge needed to minimize impacts from overnight visitors.
Visitor Safety	Southeast Alaska's weather conditions and tidal fluctuations can be extreme throughout the year. Exposure to wind and cold weather poses a threat to visitor safety. Wildlife encounters also pose a risk to safety, although the PLI Wilderness does not provide suitable bear habitat so the risk of encounters is minimal.
Outfitter and Guide Demand and Utilization	There is demand for guided camping services for the PLI Wilderness. Where? Beaches?
Public Purpose	Guided camping tours provide an opportunity for the visiting public to safely access and enjoy the PLI Wilderness for recreational pursuits. Outfitters and guides providing camping tours emphasize Leave No Trace skills and outdoor ethics. Campers often seek a wild land setting and this activity is consistent with the management of the area as wilderness.

In summary, guided camping generally occurs on the beaches along the shoreline of PLI Wilderness and results in minimal impacts to vegetation, soil, and water resources. As a result, these activities result in minimal impacts to vegetation, soil, and water resources. Wilderness also provides an opportunity for guided visitors to practice Leave No Trace camping skills and learn about outdoor ethics. Backcountry camping experiences depend on a wild land setting and are consistent with management of the area as wilderness.

There is a potential for guided groups to impact opportunities for solitude in the wilderness, particularly if the groups are large and use is authorized in popular locations. Group size will be limited to twelve and permit stipulations will be designed to reduce potential conflicts with unguided visitors.

There is demand for guided camping tours in PLI Wilderness. The beaches in PLI Wilderness provide desirable recreation settings for this type of activity. PLI Wilderness is also located in close proximity to the communities of Gustavus and Hoonah. Outfitters and guides can provide area visitors with the skills, equipment, and knowledge required to safely access and enjoy the Wilderness. There is a need for commercially-guided camping in PLI Wilderness.

## Freshwater Fishing

Evaluation Criteria	Determination of Need
Wilderness Dependence	Several streams in non-wilderness National Forest System lands on the Hoonah Ranger District and surrounding areas of the Tongass National Forest support anadromous fish populations and provide excellent freshwater fishing opportunities.
Potential Impact to Wilderness Character	The majority of freshwater fishing in the non-wilderness portion of the northern Tongass National Forest is boat-based and results in minimal impacts to vegetation, soil, and water resources. ADF&G provides sport fishing guidelines that help maintain the natural quality of wilderness character through the sustainable management of fish populations. Guided fishing activities do not impact the undeveloped quality of wilderness character. Guided groups have the potential to impact opportunities for solitude, particularly if the groups are large and use is authorized in popular locations.
Knowledge, Skills, and Equipment	Visitors must access the PLI Wilderness using motorized boats or float planes. Outfitters and guides can provide the skills, equipment, and knowledge required to safely access and enjoy the Wilderness.
Visitor Safety	Southeast Alaska's weather conditions and tidal fluctuations can be extreme throughout the year. Exposure to wind and cold weather poses a threat to visitor safety. Wildlife encounters also pose a risk to safety, although the PLI Wilderness does not provide suitable bear habitat so the risk of encounters is minimal.
Outfitter and Guide Demand and Utilization	There are no streams in the PLI Wilderness that support anadromous fish species (e.g. salmon, steelhead). The lakes in PLI Wilderness also do not provide suitable habitat for game fish. While authorized, there is no reported freshwater fishing by guides over the last five years.
Public Purpose	There is little to no public interest in guided fishing in the PLI Wilderness.

In summary, there are no streams or freshwater lakes in the PLI Wilderness that support anadromous fish such as salmon and steelhead. Although authorized, there has been no reported use for this activity by guides over the last five years. Opportunities for freshwater fishing are available on the non-wilderness portions of the Hoonah Ranger District and surrounding areas on the northern part of the Tongass National Forest. Given the lack of anadromous fish species and interest in outfitting and guiding permits for freshwater fishing, there is no commercial need for this activity in PLI Wilderness.

## Big Game Hunting

Evaluation Criteria	Determination of Need
Wilderness Dependence	Opportunities for big game hunting exist on non-wilderness National Forest System lands of the Hoonah Ranger District and surrounding areas of the Tongass National Forest. Private lands near Hoonah also provide some opportunities for guided big game hunts.
Potential Impact to Wilderness Character	The majority of hunting in PLI Wilderness and surrounding areas on the Tongass National Forest is boat-based and results in minimal impacts to vegetation, soil, and water resources. ADF&G provides recommendations, population estimates, and historical harvest data to help the Forest Service determine the number of guided hunts an area can sustain, thereby ensuring that the natural quality of wilderness character is maintained. Guided hunting groups have the potential to impact the undeveloped quality of wilderness if tent platforms are constructed. Guided groups also have the potential to impact opportunities for solitude, particularly if the groups are large and use is authorized in popular locations.
Knowledge, Skills, Equipment	Visitors must access the PLI Wilderness using motorized boats or float planes. Outfitters and guides can provide the skills, equipment, and knowledge required to safely access and enjoy the Wilderness. The Alaska Department of Fish and Game (ADF&G) requires non-resident brown bear hunters to be accompanied by a registered guide or a relative within the second degree of kin. The knowledge and skills required to identify male bears and properly care for the animal carcass in accordance with State law are beyond the average person's abilities.
Visitor Safety	Southeast Alaska's weather conditions and tidal fluctuations can be extreme throughout the year. Exposure to wind and cold weather poses a threat to visitor safety. Wildlife encounters also pose a risk to safety, although the PLI Wilderness does not provide suitable bear habitat so the risk of encounters is minimal.
Outfitter and Guide Demand and Utilization	There is low demand for guided big game hunting authorizations for the PLI Wilderness. The islands within the Wilderness do not provide bear habitat, but do provide habitat for deer. Though there are healthy populations of Sitka black-tailed deer on all of the PLI islands, there has been no request for commercially guided deer hunts. While resident hunters access the area for deer hunting, there has been no guided big game hunting reported in this area between 2008 and 2012.
Public Purpose	There is little to no public interest in guided fishing in the PLI Wilderness. Federally-qualified subsistence hunters hunt on some of PLI islands. Permitting commercial deer hunts could result in conflict between guided sport hunters and subsistence hunters.

In summary, PLI Wilderness does not provide suitable habitat for big game species such as brown and black bear. The Wilderness does provide habitat for Sitka black-tailed deer, but there has been no demand or use of guided deer hunting services documented in past years. There is no State requirement for a registered guide for deer hunting. Deer are commonly hunted without a guide throughout Southeast Alaska. While wildlife encounters may pose a risk to hunter safety, deer hunting does not pose the safety challenges associated with black and brown bear hunting. Opportunities for big game hunting are available on the non-wilderness portion of the Hoonah Ranger District and surrounding areas on the northern part of the Tongass National Forest. Given the lack of suitable habitat and interest in outfitting and guiding permits for big game hunting, there is no commercial need for this activity in PLI Wilderness.

## VIII. Summary

This needs assessment was developed to determine the public need for commercial outfitter and guide services in the PLI Wilderness. Public need is identified for services that are required to meet the Forest Service's mission to manage and protect the resources, provide for visitor safety, and provide high-quality recreation opportunities.

Based on the evaluation of the existing commercial activities on the PLI Wilderness area, a need has been identified for commercially-guided Remote Setting Nature Tours and Camping. A need has not been identified for commercially-guided big game hunting or freshwater fishing in the PLI Wilderness.

### Decision

The determination of need for commercially outfitter and guide services on the PLI Wilderness is as follows:

- Remote Setting Nature Tours: It is recommended that commercially guided remote setting nature tours **should be authorized** in the PLI Wilderness area through this needs assessment.
- Camping: It is recommended that commercially guided camping **should be authorized** in the PLI Wilderness area through this needs assessment.
- Freshwater Fishing: It is recommended that commercially guided fresh water fishing **should not be authorized** in the PLI Wilderness area through this needs assessment.
- Big Game Hunting: It is recommended that commercially guided big game hunting **should not be authorized** in the PLI Wilderness area through this needs assessment.

Commercially guided Remote Setting Nature Tours and Camping activities will only be authorized to the extent consistent with the Wilderness Act of 1964's direction to maintain wilderness character.

It is important to note that a determination of need does not imply that a commercial activity will be authorized for all locations in the PLI Wilderness. This document does not fully address the effects (e.g. social, physical) of existing and proposed commercial uses. Decisions regarding the appropriate types and levels of commercial use in particular locations will be accomplished in compliance with the National Environmental Policy Act (NEPA).

## Appendix 1. Wilderness Management Direction

### **The Wilderness Act of 1964**

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;

- Section 811 – Reasonable access for subsistence resource uses
- Section 1010 – Mineral assessments with access by air.
- Section 1110(a) – Special Access allowing for the use of airplanes, motorboats, and snowmachines (during periods of adequate snow) within conservation system units as defined by Section 102 (4). These rights may be subject to reasonable regulation to protect the natural and other values of the conservation system units.
- 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
- Section 1303(b) (2) – Allowance for the continuation of existing cabins.
- Section 1310 – Allowing for the maintenance of existing and future navigation aids and other facilities.

- 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.
- 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.

ANILCA exceptions may influence the character of some Wildernesses more than others. 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 FY 2007-2012

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 WCS identifies that, "**Needs assessments are completed for new operations or for major changes to existing outfitter programs**" [emphasis added]. 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:

- 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).
- Perception that solitude is too subjective and individualistic to manage for.
- Lack of standards or agreement on standards that define when there is a problem requiring corrective action.
- Managing for solitude without equal consideration of managing for primitive and unconfined recreation opportunities.
- The importance of access to visitors even when they support Wilderness preservation.
- Tension between providing outstanding opportunities for solitude vs. primitive and unconfined recreation.

## **Forest Service Direction**

Outfitters/guides must also meet agency objectives. These objectives are specifically outlined in the Forest Service Manuals (FSMs) and Forest Service Handbooks (FSHs).

FSM 2702 Special Uses Management states: The objectives of the special-uses program are to:

- Authorize and manage special uses of National Forest System lands in a manner which protects natural resources and public health and safety, consistent with National Forest System Land and Resource Management Plans;
- Administer special; uses based on resource management objectives and sound business management principles;
- Develop and maintain a well-trained workforce to properly manage and administer special uses; and
- Facilitate the delivery of recreational opportunities on National Forest System lands for services not provided by the Forest Service.

Forest service special use objectives specifically for outfitting and guiding, provided in FSH 2709.14, Chapter 50, Section 53.1b states:

- Provide for outfitting and guiding services that address concerns of public health and safety and that foster successful small businesses consistent with the applicable land management plan.
- Facilitate greater participation in the outfitting and guiding program by organizations and businesses that work with youth and educational groups.
- Encourage skilled and experienced individuals and entities to conduct outfitting and guiding activities in a manner that protects environmental resources and ensures that national forest visitors receive high-quality services.

Forest Service Special Use policy for outfitting and guiding provided in FSH 2709.14, Chapter 50, Section 53.1c states:

- Authorize only those outfitting and guiding activities that are consistent with the applicable land management plan and that meet the screening criteria in 36 CFR 251.54(e) and FSH 2709.11, chapter 10.
- Not authorize any development or permanent improvements in non-wilderness in the National Forest System for outfitting and guiding services, except when there is a demonstrated public need and the structures, improvements, or installations have negligible value and minimal impact on national forest resources, as with hitching posts, corrals, tent frames, permitted access routes, and shelters.

- Not authorize any development, improvements, or installations in wilderness areas for the purpose of convenience to the holder or the holder's clients; caches in wilderness areas; and permanent structures, improvements, or installations in wilderness areas unless they are necessary to meet minimum requirements for administration of the area for the purposes of the Wilderness Act (16 U.S.C. 1133c).
- Work with other Federal agencies, State and local authorities, outfitters and guides, outfitting and guiding organizations, and other interested parties to ensure that outfitting and guiding activities are consistent with applicable laws and regulations and to identify unauthorized outfitting and guiding activities. Follow procedures in FSM 5300 in investigating and preventing the occurrence of unauthorized outfitting and guiding activities.

Forest Service policy addressing outfitter and guide operations in wilderness found in FSM 2323.13g states that managers should;

Address the need for and role of outfitters in the forest plan. The plan must address the type, number, and amount of recreation use that is to be allocated to outfitters. Ensure that outfitters provide their service to the public in a manner that is compatible with use by other wilderness visitors and that maintains the wilderness resource.

Objectives for wilderness management provided in FSM 2323.11 are to:

- Provide, consistent with management of the area as wilderness, opportunities for public use, enjoyment, and understanding of the wilderness, through experiences that depend upon a wilderness setting.
- Provide outstanding opportunities for solitude or a primitive and unconfined type of recreation.

Forest Service policy addressing recreation management in wilderness is found in FSM 2323.12 states:

- Maximize visitor freedom within the wilderness. Minimize direct controls and restrictions. Apply controls only when they are essential for protection of the wilderness resources and after indirect measures have failed.
- Use information, interpretation, and education as the primary tools for management of wilderness visitors.
- Manage for recreation activities that are dependent on the wilderness environment so that a minimum of adaptations within wilderness are necessary to accommodate recreation.
- Consistent with management as wilderness, permit outfitter/guide operations where they are necessary to help segments of the public use and enjoy wilderness areas for recreational or other wilderness purpose.

## **Forest Plan Direction for Wilderness** (pages 3-7 to 3-25)

### **Goals**

To manage all designated Wilderness to maintain an enduring Wilderness resource while providing for public access and uses consistent with the Wilderness Act of 1964 and the Alaska National Interest Lands Conservation Act of 1980 (ANILCA).

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

To 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 modern human control or manipulation, including actions taken to manage Wilderness.

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

### **Objectives**

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

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

Provide for public use of the Wilderness in accordance with ANILCA provisions for motorized and non-motorized access and travel, including reasonable traditional subsistence use by rural residents.

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. Facilities tend to allow for challenge and risk instead 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.

## **Desired Condition**

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 for public access and other uses to the extent provided by ANILCA. If not specifically provided through an ANILCA exception, the resources within a designated Wilderness shall be administered in accordance with the applicable provisions of the Wilderness Act.

The Forest Plan notes that; “Special Use Authorizations permitting individuals or organizations to provide visitor services in Wilderness may be issued if there is a demonstrated need for the service(s) and they are deemed appropriate for the area proposed.”

## Appendix 2. Special Use Permit Stipulations for Outfitting and Guiding on National Forest System Lands, Tongass National Forest

### SPECIAL STIPULATIONS

The first group of stipulations apply to all National Forest System lands covered by this permit. These are followed by lists of stipulations specific to individual Forest Service Administrative Units.

#### All Areas Within The Scope Of This Permit

A copy of the permit (with current operating plan, maps, amendments, or other attachments), must be with the permit holder, or accessible at all times to all employees, when operating on National Forest System lands. The number of copies of the permit needed in the field to comply with this requirement is the responsibility of the permit holder. An operator providing ancillary service for only point-to-point transport of clients to and from the field will not be required to copy the permit but must be able to identify the permit holder to whom the services are being provided if asked.

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.

Outfitter-guides will incorporate "Leave No Trace" skill into all activities on National Forest in accordance with the Appendix.

In a congressionally designated wilderness, no more than two groups of 12 people or less (including guides) from a single vessel or other means of transport or access are allowed. No more than 24 individuals from a vessel may use a specific wilderness in a single day. These groups are required to disperse out of sight and sound from each other when using National Forest System lands to minimize impacts to a specific site or others using the area.

When viewing wildlife, outfitters and guides are required to adhere to the following resource protection measures (Tongass Land and Resource Management Plan, 2008)

- Marine Mammals: Operators will comply with the National Marine Fisheries Service Marine Mammal Viewing Guidelines and Regulations.
- Mountain Goats: Mountain goats are present in subalpine/alpine habitat and are particularly sensitive to disturbance during the winter through the kidding season (approximately June 15). Aircraft should maintain a 1,500 meter- 2 kilometer [4,921 - 6,562 ft] horizontal distance and a minimum 500 meter [1,640 ft] vertical distance from goats. Limit other activities in subalpine/alpine ecosystem and avoid approaching or conducting other activities that elicit fright/flight behavior in goats (nervous glancing around, walking, running).
- Seabird Breeding Colonies: a). Maintain a 250 meter no-disturbance distance from seabird colonies on upland habitats. b) When weather ceilings permit, maintain a constant flight

direction and airspeed and a minimum flight elevation of 1,500 feet (458 meters) for helicopters and fixed-winged aircraft. If at all possible, avoid flying over seabird colonies

- **Waterfowl and Shorebird Habitats:** To reduce human disturbance, provide a minimum distance of 330 feet (100 meters) between human activities on the ground and significant areas being used by other waterfowl.
- **Bald Eagle Nest Sites:** If the activity will be visible or highly audible from the nest, maintain a 330-foot buffer during the breeding season. See National Bald Eagle Management Guidelines for additional considerations.

**Karst and Cave Resources:** Outfitter/guides will protect karst and cave resources as required by the Federal Cave Resources Protection Act (FCPRA). Cave use is not permitted without an approved Cave Protection plan (Tongass Resource and Land Management Plan, 2008).

**Beach Meadows:** To minimize impacts to beach meadows, outfitter/guides and their clients will not 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 (Tongass Land and Resource Management Plan, 2008).

Plant species shall not be collected without a Forest Products Permit. Sightings of listed sensitive plants should be reported to the Forest Service. The updated sensitive plant list can be found at this website: ([http://fswweb.r10.fs.fed.us/staffs/wfew/index\\_wfew.shtml](http://fswweb.r10.fs.fed.us/staffs/wfew/index_wfew.shtml))

Use Reports are required to be submitted within the timeframes identified by the permit and according to the instructions. Use Reports that are incomplete or illegible may be returned to the permit holder for corrections. Use Reports that are late, incomplete or illegible may be a factor in the year-end performance evaluation and can result in a notice of non-compliance.

## Appendix 3. ROS Classes for PLI Wilderness (Tongass Land and Resource Management Plan, 2008 )

### Semi-Primitive Non-Motorized

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 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 class.
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 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

Setting indicators	Standards and Guidelines
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 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.