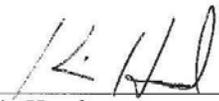


Appendix F

Wilderness Commercial Needs Assessments



**Kootznoowoo Wilderness Recreation Commercial
Needs Assessment**
Admiralty Island National Monument

Submitted by:  10/18/2013
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Date

Approved by:  10/18/13
Chad VanOrmer
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Date

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.

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. The 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:

- 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.
- Is an internal analysis.
- Does not analyze or mitigate potential environmental impacts from commercial outfitting and guiding activities.
- 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:

- **Introduction** – provides the context and scope of this needs assessment.
- **Kootznoowoo Wilderness** – provides brief overview of the wilderness qualities and applicable laws.
- **Commercial Service Activities & Public Purposes** – defines the commercial service activities, purposes and screening questions for determining need.
- **Wilderness Character** – defines wilderness character and provides screening questions

to determine compatibility with activities.

- **Determination of Need for Commercial Service Activities** – presents findings for determination of need.

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).

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:

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) 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.

(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.

² 36 CFR 293.8, Permanent structures and commercial services.

³ Forest Service Manual, 1110 Directives, exhibit 1110.8.

“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.

This section concludes with examining in greater detail:

- I. Commercial Outfitter and Guide Service Activities
- II. 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.

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

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 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]

⁵ Ibid, 16 USC 1133(b).

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

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

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?

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?

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

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?

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 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.

⁹ ANILCA, 1980, 16 USC 3101

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.

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

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:

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.

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 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?

Untrammeled

“Untrammeled” is also defined as “unfettered”:

4. Untrammeled. 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 untrammeled 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 untrammeled 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 untrammeled character. The habituated bears at Pack

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.

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.

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

Untrammelled 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.

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;

- Failure to realize the recreational purposes for the Kootznoowoo Wilderness (Rp1-Challenge, Rp2-Traditional);
- Failure to realize the scenic purposes for the Kootznoowoo Wilderness (Sp2-

connections);

- 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?

Table F1-1. Wilderness Area uses, public purposes, and wilderness character.

	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

Tracy Arm – Ford’s Terror & Chuck River Wilderness Commercial Needs Assessment

Juneau Ranger District, Tongass National Forest

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Executive Summary

This document applies criteria of the Wilderness Act to determine which recreation commercial service activities may be necessary in the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas. Section 4(d)6 of the Wilderness Act reads:

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.

The preservation of wilderness character is a requirement of Sections 2(a) and 4(b) of the Wilderness Act, and is a critical element in determining which commercial service activities may or may not be compatible in these wilderness areas. There cannot be a need for commercial services that degrades wilderness character: preservation of wilderness character takes precedence as the paramount purpose of the Wilderness Act. Section 2(c) of the Wilderness Act defines wilderness and presents the terms that depict wilderness character.

Section 4(d)6 requires commercial services to realize purposes listed by the Wilderness Act that categorize beneficial uses of wilderness. These purposes, called the public purposes or recreation and wilderness purposes, are listed under Sections 2(c) and 4(b). Section 4(b) affirms that these purposes are subordinate to the primary purpose of preserving wilderness character. A positive determination of need for a recreation commercial service requires the activity realize public purposes while being compatible with preserving wilderness character.

This assessment pertains solely to recreation commercial service activities commonly referred to as commercial outfitting and guiding operations. It does not consider other commercial or noncommercial uses. It concludes with a determination as to whether or not five categories of recreation commercial services are necessary in the in the Tracy Arm – Ford's Terror and Chuck River Wilderness Areas. Need was determined with 17 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 Act of 1980 (ANILCA). If recreation or other wilderness purposes are realized while wilderness character is upheld, commercial services may be deemed necessary. The following summarizes the findings:

Determination of Need for Commercial Service Activities:

- *Remote setting nature tour commercial service activities are necessary in the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas.*
- *Floatplane landing tour commercial service activities are not necessary in the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas.¹⁶*
- *Camping commercial service activities are necessary in the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas.*
- *Freshwater fishing commercial service activities are necessary in the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas.*
- *Hunting commercial service activities are necessary in the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas.*

¹⁶ See p.9 for definition of floatplane landing tour.

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.

INTRODUCTION

This document is a wilderness commercial needs assessment for the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas. It applies criteria of the Wilderness Act of 1964 (Wilderness Act) to determine which recreation commercial service activities may be necessary in the Tracy Arm – Ford's Terror and Chuck River Wildernesses.

The need for 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 public 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) requires analysis of any proposed commercial outfitter and guide allocation of the overall recreation capacity. This analysis culminates in a decision that establishes mitigation measures that balance use with protection of the National Forest resource. The decision would define the extent and amount of commercial recreation use to be authorized. This process informs 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 uses permits authorize individual outfitter-guides within the determined allocation and according to established mitigation measures.

This needs assessment:

1. Determines the need for various activities of commercial outfitter-guides based on fulfilling public purposes of the Wilderness Act and compatibility with preserving wilderness character within the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas.
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 entirety of both the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas.

This is intended to be a living document. It is recognized that wilderness conditions and factors that affect them may change, as may 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:

- **Introduction** – provides the context and scope of this needs assessment.
- **Tracy Arm - Ford's Terror and Chuck River Wilderness Areas** – provides brief overview of the areas' wilderness qualities and applicable laws.
- **Commercial Service Activities & Public Purposes** – defines the commercial service activities, public purposes and screening questions for determining need.
- **Wilderness Character** – defines wilderness character and provides screening questions to determine compatibility with activities.
- **Determination of Need for Commercial Service Activities** – presents findings for determination of need

TRACY ARM - FORD'S TERROR AND CHUCK RIVER WILDERNESS AREAS

Tracy Arm - Ford's Terror Wilderness: A Primeval Sanctuary

Behold primordial time itself: a glacier reminding us of an ice age that began over a million years ago. Across the millennia this condensed ice flowed down from the mountains grinding granite into flour. Today, the glacier retreats as it calves icebergs into the sea and continues its centuries-old unveiling of the dramatic fjord it has sculpted. Ancient crumbling ice supports precious new life: a harbor seal pup born minutes ago flops on an iceberg. Eagles descend on the afterbirth and possibly the hapless pup itself. The mother seal squirms to protect her vulnerable newborn. Then she pushes her pup into the water and follows, their awkwardness on ice transformed into aquatic grace.

The fjords of Tracy Arm and Endicott Arm comprise a primeval sanctuary where the ageless cycles of rock and ice and seals and eagles challenge our perceptions. Time is brief and yet eternal. Life is frail yet resilient. The only constant in nature is impermanence. 17

From Human and Natural History in Tracy Arm – Ford's Terror Wilderness:¹⁸

The Tracy Arm-Ford's Terror Wilderness is about forty-five miles southeast of Juneau. It encompasses 653,179 acres of the rugged Coast Mountains bordering Holkham Bay, on the east side of Stephens Passage. It surrounds three dramatic glacial fjords—Tracy and Endicott Arms and Ford's Terror—and extends eastward to the glaciers and high mountains of the Canadian border.

Tracy Arm-Ford's Terror is mountainous and heavily glaciated, with most of its terrain above treeline. Although a few low valleys host mature forest, most land along shore is covered in an early-successional mix of alder, willow and young spruce. Steep shores, swift streams, cliffs, narrow gorges, glaciers and thick vegetation make travel on land difficult. The wilderness has no cabins or maintained trails. However, protected waters, spectacular scenery and small beaches contribute to ideal sea kayaking, if you can stand the rain.

For many visitors this wilderness is all about glaciers, both present and past. In addition to three tidewater glaciers that regularly calve ice bergs into the ocean, its surrounding mountains tell a dramatic story of Pleistocene glaciation, with rounded domes, sheer walls and deep, U-shaped valleys.

Traveling Tracy or Endicott Arms, both about thirty miles long, is like taking a trip back to the Pleistocene Epoch, when huge glaciers covered southeast Alaska. In Holkham Bay, where the arms begin, mature rain forest lines steep shores that have been de-glaciated for thousands of years. Permanent snowfields and a few glaciers cover mountaintops high above the bay. But within the fjords, the snow and ice increase and the forest is noticeably younger, a result of more recent glaciation. Instead of mature spruce and hemlock, thickets of alder and willow dominate the thin soil. A few spruce rise above the thickets, pioneers of the tall forests that will eventually fill the valleys. At the ends of the arms, close to the glaciers, even the alders and willows are rare. The developing soils only support clusters of pioneer plants such as lupine and fireweed. In this raw landscape, the receding glaciers uncover more bare rock and gravel each year.

The landscape also grows more dramatic within the fjords, which reach deep into the Coast Mountains. Some peaks exceed 7,000 feet a little more than a mile from shore. Pleistocene glaciers sculpted them into dramatic nunataks, horns and domes. Most still host permanent snow fields and alpine glaciers.

¹⁷ JRD Wilderness program specialists' descriptive statement for the Tracy Arm - Ford's Terror Wilderness Area.

¹⁸ By Tim Lydon, USFS wilderness ranger.

Tracy Arm-Fords Terror became part of the Tongass National Forest in the early 1900s. It was designated a National Forest Scenic Area in 1960, after years as a tourist attraction. In 1970 it became a Wilderness Study Area in recognition of its dramatic beauty and opportunities for solitude. In 1980, it was designated wilderness as part of the Alaska National Interest Lands Conservation Act (ANILCA). The law put the area under the authority of the 1964 Wilderness Act.

The wilderness surrounds Tracy Arm, Fords Terror and most of Endicott Arm and Holkham Bay. The south shore of Holkham Bay and part of Endicott Arm's south shore are part of the adjacent Chuck River Wilderness, designated in 1991.

Chuck River Wilderness: The Promise of Wilderness

Chuck River reflects the rise of wilderness appreciation in modern society. The local Tlingit enjoyed the bounty of nature by trapping and fishing in Windham Bay. Settlers arrived in the 1890's seeking gold. They dug mines into the mountains, laid roads through the forests and built structures along the shore. The mining boom subsided around the 1920's, people moved on and their developments fell into disrepair. In the 1980's, timber resources were marked and potential roads were staked. But before it was logged, the American people embraced a new value - that of wilderness. In order to protect old-growth forest and riparian habitat, Congress designated the Chuck River Wilderness in 1990. The section adjoining the Tracy Arm – Ford's Terror Wilderness completes the protection of spectacular Endicott Arm. Today this wilderness patiently re-wilds its weather-beaten ruins as people treasure it for tranquility, scenic beauty, aged forests, healthy fish runs, hunting opportunities and protected anchorages.¹⁹

In whole, the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas currently has at least 18 outfitter-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-guides are allowed to operate on shore along the entire marine coast of the wilderness area. Only one outfitter-guide, a mountain goat hunting guide, is authorized to operate within the interior lands (generally ½ mile or more from mean high tide) or lakes of the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas due to lack of market demand and appropriate environmental analysis.

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 Tracy Arm - Ford's Terror Wilderness. The Chuck River Wilderness was designated as part of an amendment to ANILCA passed under the Tongass Timber Reform Act of 1990. ANILCA includes exceptions to the Wilderness Act that apply to Alaskan wilderness areas. Specific sections that apply to the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas and this assessment include:

- 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 (including the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas); however, there are no present day commercial operations that

¹⁹ JRD Wilderness program specialists' descriptive statement for the Chuck River Wilderness Area.

were authorized use within the bounds of the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas on that date.

- Section 1315(d) allows for construction of new cabins if necessary for the protection of public health and safety.
- Section 1316 (a) allows, subject to reasonable regulation to insure compatibility, for existing uses and future establishment, and use, of temporary campsites, tent platforms, shelters, and other temporary facilities and equipment directly and necessarily related to taking of fish and wildlife.
- 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.

Other than the exceptions expressed in ANILCA, commercially guided uses within Tracy Arm - Ford's Terror and Chuck River Wilderness Areas 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, 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.²⁰

²⁰ Wilderness Act, 16 USC 1133(d)(5).

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. 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-guide services in the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas:

- (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.²¹

Outfitter-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 popular with the public who visit the Tongass National Forest. Not all of these activities are currently authorized within the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas, but they represent reasonably foreseeable future demands for services. Outfitter-guide activities that are currently not authorized by the Forest Service in the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas 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."²² 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 Tracy Arm - Ford's Terror Wilderness, and the TTRA which designated the Chuck River Wilderness as an amendment to ANILCA.

(4) To The Extent Necessary

²¹ 36 CFR 293.8, Permanent structures and commercial services.

²² Forest Service Manual, 1110 Directives, exhibit 1110.8.

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. The phrase “to the extent necessary” has been subject to court arguments where the prevailing ruling mandates this to be a minimizing provision, which aligns with the overall limitations on commercialism instituted by the Wilderness Act.

“Extent” means “scope” or “magnitude.”²³ 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.

Commercial service activities are “necessary” if they are found to achieve the public purposes of wilderness without impairment of wilderness character.

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

Proper activities are those that 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, 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 five broad categories that encompass the spectrum of commercial outfitting and guiding operations: 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-guides play a meaningful role in teaching the skills necessary to enjoy historic and recreational pursuits, in interpreting the scenic, scientific, educational, conservation and historical values of the visited wilderness area and in training visitors to be good stewards of wilderness.

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 are those that occur above mean high tide on National Forest System lands. Not included are strictly point-to-point transportation services that are not a tour or part of a package trip. Many activities that take place within the Tracy Arm - Ford’s Terror and Chuck River Wilderness Areas 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, and 5) hunting.

²³ Webster’s 9th New Collegiate Dictionary, 1990, page 440.

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 popular with wilderness visitors and offered by commercial service providers within the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas. The size of these day use groups tends to be the largest of all activities (group size in wilderness is capped at a maximum of 12 people per group). Visitors may spend from one to several hours participating in these activities. Desirable attributes for these activities include accessible sections of shoreline and unique features of geological, ecological or cultural interest. Specific areas within the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas that are popular for these activities include the shores near the Dawes Glacier, North Dawes Inlet, Sanford Cove, Wood Spit and the south shore of Holkham Bay, with other shores, streams and bays attracting occasional interest. Access to the wilderness and along adjacent marine waters is achieved by boat, aircraft or paddle craft. Travel within the wilderness is typically by foot.

Floatplane landing tour activities are common in other parts of the Tongass National Forest, but are not traditional or currently authorized within the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas. A floatplane landing tour is defined in this assessment as a day-use activity that predominantly involves a substantial portion of the tour viewing natural features by air and landing once or multiple times within the wilderness and returning back to its point or vessel of origin. It typically involves a party of six to twelve people who spend little time on land and most of the time in the air flightseeing. The definition of a floatplane landing tour does not include point-to-point floatplane transport.

Camping is defined as overnight use within the wilderness. Daytime activities associated with camping 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 and so on. Popular camping locations feature accessible marine shoreline which can be severely limited by steep-walled fjords or sheer shorelines. This limited geographic availability combined with commonly desired destinations (e.g. glaciers, bays, islands) concentrates camping use in certain sites. This concentration of use creates impacts to the natural resource and to the areas' outstanding opportunities for solitude. Camping use within the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas can be characterized as moderate and concentrated. It should be noted that there is significant camping use by noncommercial sea kayaking groups.

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. There has been almost no guided freshwater fishing in the Tracy Arm - Ford's Terror Wilderness as there are much better fishing options elsewhere than the glacial fjords. There has been slightly more (but still little) guided freshwater fishing within the Chuck River Wilderness as this area has a few rivers running out of old-growth forest.

Hunting includes the hunting of brown bear, black bear, mountain goats, deer, and waterfowl. This use depends on places and times where game occur and must comply with state regulations. State regulations require a registered guide or resident kin for nonresident big game hunters. Additionally, hunting requires a high degree of solitude for safety and practical reasons (undisturbed wildlife). This need for solitude combined with the limited number of sheltered bays / safe anchorages in the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas limits the number of commercial hunting guides that can operate at the same time without impinging on each other's or noncommercial users' operations. Guided hunting use typically reflects a boat-based guiding operation that thoroughly explores a bay, fjord or an expanded area of marine shoreline for the duration of the hunt. Currently there is only one outfitter-guide authorized to use an alpine camp as their base of operations. Groups tend to be smallest in size (average of 1.8 clients per group) to minimize disturbance and competition and to maximize chances of success. Hunting

seasons vary by species but generally speaking are open for spring, fall and some summer months and are closed during the peak of summer and for the winter.

Recreational or Other Wilderness Purposes

Activities provided by outfitter-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.**²⁴
[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 identified in the law. Drawing a clear connection between commercial service activities and purposes is the basis of determining the need for commercial services. The Wilderness Act does not specify how many public purposes must be realized. Those commercial services that realize the most public purposes without impairing wilderness character would be the most compatible with wilderness according to the criteria of the law.

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....”²⁵ 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 Tracy Arm - Ford’s Terror and Chuck River Wilderness Areas follow.

Recreational

The recreational use purpose of wilderness includes participation and/or instruction in traditional wilderness activities such as hiking, backpacking, canoeing, skiing, wildlife viewing, hunting, and fishing in an unconfined primitive setting that provides opportunities for solitude. There is a distinct qualitative aspect to the recreational purpose of wilderness:

²⁴ Wilderness Act, 1964, 16 USC 1133(b).

²⁵ Wilderness Act, 1964, 16 USC 1131 (a).

An area of wilderness if further defined to mean in this Act an area ... which ... **has outstanding opportunities for solitude or a primitive and unconfined type of recreation**²⁶ [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**.²⁷ [emphasis added]

This qualitative aspect is realized if outfitter-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-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 a substantial degree of specialized skill, equipment and involve challenges that inhibit access and enjoyment by the majority of the general public?

Rp2 - Do the commercial service activities align with traditional wilderness pursuits?

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 inspiration within. It allows visitors to experience being a part of something much bigger, more complex and 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 inspiration and/or allow for deep connections with nature uninhibited by modern civilization?

Scientific

Activities offered by commercial outfitter-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-guide activities might assist State Fish & Game Departments or other organizations with

²⁶ Wilderness Act, 1964, 16 USC 1131(c).

²⁷ Title 36, Code of Federal Regulations, Part 293.2.

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-guide is to enhance client enjoyment and use of wilderness. This entails a teacher-student relationship that imparts knowledge and skills from the outfitter-guide to clients, and includes interpretation which forges emotional connections between clients and nature.

Commercial service activities may realize the educational purpose by educating clientele about 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. Outfitter-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-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 Tracy Arm - Ford's Terror and Chuck River Wilderness Areas 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-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, Leave No Trace practices, proper hunting and fishing ethics and proper wildlife viewing ethics such as marine mammal viewing guidelines.

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 Tracy Arm - Ford's Terror Wilderness features some of the fastest wasting glaciers on earth; the Chuck River Wilderness features old-growth forest once slated for logging and re-wilded settlements. These provide opportunities to measure human impact on the environment and to contemplate nature's resiliency. 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 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-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?

WILDERNESS CHARACTER

In order to determine need, commercial outfitter-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 Tracy Arm - Ford's Terror and Chuck River Wilderness Areas and determines whether the outfitter-guide activities are compatible with their preservation for future generations.

This assessment determines compatibility with the Wilderness Act and screens out inappropriate activities; it does not analyze the effects of outfitter-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 Tracy Arm - Ford's Terror and Chuck River Wilderness Areas are described in ANILCA Section 101(b):

It is the intent of Congress in this Act to preserve unrivaled scenic and geological values associated with natural landscapes; to provide for the maintenance of sound populations of, and habitat for, wildlife species of inestimable value to the citizens of Alaska and the Nation, including those species dependent on vast relatively undeveloped areas; to preserve in their natural state extensive unaltered arctic tundra, boreal forest, and coastal rainforest ecosystems, to protect the resources related to subsistence needs; to protect and preserve historic and archeological sites, rivers, and lands, and 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; and to maintain opportunities for scientific research and undisturbed ecosystems.²⁸

This assessment is organized to consider the wilderness character for the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas 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 wilderness:

²⁸ The Alaska National Interest Lands Conservation Act, 1980, Section 101(b).

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.²⁹

The Tracy Arm - Ford's Terror and Chuck River Wilderness Areas covers ecosystems from the austere Stikine Icefield to old growth forests. Wildlife populations range from terrestrial mammals such as black and brown bear, Sitka black-tailed deer, mountain goat, gray wolf and river otter to sea birds, waterfowl and shorebirds such as marbled and Kittlitz murrelets, loons, scoters, oystercatchers, arctic terns and gulls to fish including all five salmon plus cutthroat and steelhead trout to amphibians such as boreal toads and various newts. Marine mammals plying the adjoining waters include humpback whales, orca, harbor seals, Steller sea lions and harbor porpoises.

Key ecological processes include:

- Harbor seals returning to Tracy and Endicott Arms in the hundreds every summer to haul out in front of the glaciers on ice floes to birth and nurse pups and to molt.
- Arctic terns returning each summer to nest in colonies in the gravelly moraines of the glaciers.
- Oystercatchers nesting on the ground and gulls nesting in cliff colonies.
- Bears feeding in the intertidal zone in late spring to get calories after the long winter and before the vegetation returns and then feeding on salmon runs in the late summer.

There may be plant species that are officially listed as threatened and endangered in the Tracy Arm – Ford's Terror wilderness areas, but none have been found yet. Invasive plants are limited to localized patches in areas of historic human settlement.

Absent human influence, air quality is high. Stream water quality is believed to be high. Undeveloped watersheds, continuous flushing from rainfall and freezing winter temperatures contribute to purity. Soils range from recently de-glaciated bare rock to newly established thin soils to thick organic soils in the older forests.

Challenges to naturalness include:

- Tourism operations interfering with wildlife by getting too close.
- Powered vessels impairing air quality and the natural soundscape.
- Denuding of thin soil bases in recently de-glaciated areas by concentrated use.
- Climate change impacts altering ecosystems (e.g. glacial wasting; yellow cedar dying off; warming rivers no longer supporting salmon reproduction)

Outfitter-guide services play an important role in protecting natural aspects of Tracy Arm - Ford's Terror and Chuck River Wilderness Areas by respecting wildlife and by helping clients to understand wildlife sensitivities, game laws, and best management practices. Outfitter-guides can also help prevent the spread of invasive species and impacts to sensitive soils and vegetation. Outfitter-guides can also take measures to uphold clean air and the natural soundscape.

Natural character screening question:

²⁹ 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.

Nc1 - Are commercial service activities compatible with preserving the natural character of Tracy Arm - Ford's Terror and Chuck River Wilderness Areas?

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.³⁰

For the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas it is uncommon, though not rare, to encounter someone ashore; nonetheless, solitude has been impaired. The constrained waterways – tight fjords, narrow channels and intimate bays – place the off-forest marine traffic in close quarters with on-forest wilderness visitors. The effect is that encounters recorded here by wilderness users are often rated as having more impact than similar distance encounters elsewhere. The loss of outstanding opportunities for solitude is a serious degradation and continuing threat facing the Tracy Arm – Ford's Terror and Chuck River wilderness areas. For the first wilderness, there is a constant presence of people where guided recreation is growing in popularity, where engine noise carries far over water and echoes off granite walls, where public address announcements can be heard over three miles from the ships broadcasting them and where haze from emissions lingers. For the latter wilderness, the south shore of Holkham Bay, Sanford Cove and Windham Bay are increasingly popular anchorages for vessels offering commercial tours and the private lodge in Windham Bay may invite increased use.

The wilderness staff actively monitor for conditions of solitude. These areas where this aspect of wilderness character has been lost or is threatened will be considered in future NEPA decision making processes.

Regarding Primitive and Unconfined Type of Recreation indicators, for the Tracy Arm – Chuck River wilderness areas there has been little change in recent years. There are no cabins, shelters or outhouses in the wilderness areas. The single trail up from Windham Bay to Taylor Lake has been buried under a massive landslide and flooded by diligent beavers; there is no intention of re-creating it. Two food-storage cables have been fixed in Ford's Terror in areas popular with campers and bears, but lacking in trees adequate for caching food. Primitive and Unconfined Recreation Opportunities abound.

Outfitter-guide activities can enhance the wilderness experience quality for visitors, contributing to people's use and enjoyment of wilderness, and 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. A recent threat analysis prepared for Tracy Arm - Ford's Terror and Chuck River Wilderness Areas noted,

³⁰ 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.

Activities authorized under special use permit, as well as those occurring adjacent to wilderness on the marine waters or inholdings, add more visiting parties to the landscape. Increased visitor presence and the haze produced by cruise vessels affect the **outstanding opportunities** for solitude or primitive and unconfined recreation.³¹

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.³²

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 and homesites. These ANILCA exceptions do not alone constitute a degradation of the Undeveloped Quality.³³

Indicators for the Undeveloped Quality relate to the presence/absence of constructs and uses reflecting modern development rather than primeval wilderness. In terms of structures and installations on national forest system land, the Tracy Arm – Ford’s Terror and Chuck River wilderness areas are largely undeveloped save for ANILCA-allowed navigational aids and scattered USGS survey markers.³⁴ The Beezer Mountain radio repeater lies just outside the wilderness boundary and the communication site on Dry Mountain is also outside of wilderness.

Regarding inholdings, there are a few areas of non-national forest land in the Tracy Arm – Ford’s Terror wilderness area that could potentially be developed to the detriment of the wilderness character. The Chuck River wilderness area has several developed inholdings, including a waterfront lodge. The Forest Service has acquired some inholdings from willing sellers; however new owners with strong tourism

³¹ Tracy Arm - Ford’s Terror and Chuck River Wilderness Areas Information Needs Assessment, 2011.

³² 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.

³³ Note, however, that noise, lights and emissions from such modes of transportation 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.

³⁴ Recreational structures and installations are considered under Outstanding Opportunities for Solitude or a Primitive and Unconfined Type of Recreation.

industry connections have recently purchased the lodge. Renovation and new construction could further impair the Undeveloped Quality of the surrounding area (and associated use and effects might comprise additional impacts, as well as afford new opportunities to realize educational, recreational and experiential benefits).

Undeveloped character screening question:

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?

Untrammeled

“Untrammeled” is also defined as “unfettered”:

4. **Untrammeled.** 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 untrammeled 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.³⁵

ANILCA allows a few exceptions for actions that may impair the untrammeled wilderness character quality, such as fish habitat enhancement.

Regarding the Tracy Arm – Ford’s Terror and Chuck River wilderness areas, outfitter-guides generally do not intentionally control or manipulate ecological systems or their constituents. Commercial operators may affect wildlife, vegetation, air quality and other natural aspects, but these impacts are considered under the natural quality of wilderness character.

Some commercial operators have expressed interest in assisting in USFS-led weed pulls to eradicate invasive weeds. Such instances would impinge the untrammeled quality, but likely be offset by the positive benefits to naturalness and the realization of conservation and education 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

³⁵ 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.

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.³⁶

The history of Tracy Arm – Ford’s Terror and Chuck River Wildernesses includes cultural sites and subsistence uses intrinsic to the history and identity of its people. Former settlement sites related to native Alaskans, miners and fox farmers have been identified in the Tracy Arm – Ford’s Terror and Chuck River Wildernesses – and large areas still remain uninventoried by archeologists. Subsistence opportunities exist for seal, mountain goat, bear, deer, smaller fur-bearers, salmon, berries and other resources.

Professional outfitter-guides and properly managed commercial services may help protect cultural sites and artifacts and uphold subsistence opportunities. Conversely, improperly managed or conducted commercial operations may damage such sites or artifacts through negligence or abuse. Guides may also impact subsistence opportunities if their operations result in:

- Reduction in resources available for subsistence
- Major redistribution of resources
- Substantial interference with access to resources
- Major increases in the use of subsistence resources by nonrural residents³⁷

Commercial services should only occur if they are compatible with upholding these Other Features of Value for the Tracy Arm – Ford’s Terror and Chuck River Wilderness Areas.

Other Wilderness Character screening question:

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

Ovc2 – Are commercial service activities compatible with the preservation of prominent ecological, geological and scenic features identified in the Tracy Arm – Ford’s Terror and Chuck River Wilderness Areas?

³⁶ 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.

³⁷ Region 10 Amendment 2090.23-2006-1, 2006, Forest Service Handbook 2090.23, Chapter Zero Code, page 5.

DETERMINATION OF NEED FOR COMMERCIAL SERVICE ACTIVITIES

The following section examines the commercial services by activity for the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas. 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 realize recreation or other wilderness purposes and be compatible with preserving wilderness character. 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 Tracy Arm - Ford's Terror and Chuck River Wilderness Areas.

Hiking, wildlife viewing, photography and sightseeing are popular activities, especially along the marine shorelines of Tracy Arm - Ford's Terror and Chuck River Wilderness Areas. The glacial fjords offer world class opportunities to witness tidewater glaciers, sculpted fjords and how life succeeds an ice age. 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 Tracy Arm - Ford's Terror and Chuck River Wilderness Areas.

Floatplane landing tour activities are common in other parts of the Tongass National Forest, but are not traditional or currently authorized within the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas. 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. The definition of floatplane landing tours 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 Public Purpose Screening Questions Rp2-Traditional, Sp2-Inspirational and Cp3-Stewardship; and Wilderness Character Screening Questions Nc1-Natural, Oc1-Solitude and Oc2-Primitive. Compared to other activities examined in this assessment, floatplane landing tours realize fewer public purposes and degrade wilderness character.

This activity primarily accesses freshwater lakes or marine waters. There are few suitable lakes within the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas and they afford outstanding opportunities

for solitude that have been lost along the accessible marine corridors penetrating the wilderness. There is no need to introduce floatplane landing tours along the well-trafficked marine waters to access sites already used by boat-based tourism. In addition, this activity is not considered a traditional wilderness pursuit, as it predominantly involves viewing natural features from the air and landing for only short periods of time within the wilderness (question Rp2). This activity generally does not allow opportunities for visitors to forge deep connections with nature uninhibited by modern civilization. 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 dominated by modern mechanization and convenience (flying) and does not fulfill the scenic purposes of wilderness (question Sp2). This activity, with brief visits in wilderness but primarily focused on flying, does not offer an in-depth experience that supports participation in citizen stewardship projects; nor does it provide sufficient context for larger world conservation concerns (question Cp3). Therefore, this commercial service activity is not necessary to achieve the recreation public purposes of the Wilderness Act.

Floatplane landing tours are not compatible with preserving wilderness character, in particular, with regards to naturalness and to outstanding opportunities for solitude or a primitive and unconfined type of recreation, specifically Wilderness Character Screening Questions Nc1, Oc1 and Oc2. The confined fjords with granite walls and marine floors project aircraft noise for many miles. This activity would occur on lakes that afford degrees of solitude rare elsewhere in the wilderness and would degrade 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 Tracy Arm - Ford's Terror and Chuck River Wilderness Areas.

Outfitted and guided camping services are currently a small component of commercial use in the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas, but significant in the rich experiences they afford visitors. The majority of camping services occur in connection with multiple day marine based kayak trips along the shoreline. Camping involve skills that embrace traditional techniques and require elements of risk and challenge, especially for those new to the activity. 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.

Freshwater Fishing

Freshwater fishing commercial service activities are necessary in the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas.

Fishing guides in general can help realize the purposes of wilderness in most locations of Tracy Arm - Ford's Terror and Chuck River Wilderness Areas 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 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 Tracy Arm - Ford's Terror and Chuck River Wilderness Areas.

Hunting guides can realize most of the public purposes while preserving wilderness character. Non-resident big game hunters are required under state regulation to be accompanied by a guide or resident family member. The Tracy Arm – Ford's Terror and Chuck River Wildernesses feature 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 involve challenges that inhibit access and enjoyment by the majority of the general public?

Rp2 - Do the commercial service activities align with traditional wilderness pursuits?

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

Sp2 - Do the commercial service activities invoke opportunities for inspiration 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 Tracy Arm - Ford's Terror and Chuck River Wilderness Areas 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 Tracy Arm - Ford's Terror and Chuck River Wilderness Areas?

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?

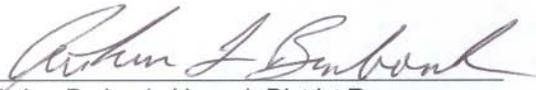
Ovc2 - Are commercial service activities compatible with the preservation of prominent ecological, geological and scenic features identified in the Tracy Arm - Ford's Terror and Chuck River Wilderness Areas?

Table F2-1. Findings for the Tracy Arm – Ford’s Terror and Chuck River Wilderness Areas

	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-Inspirational	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	No	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
Ovc2-OtherFeatures	Yes	Yes	Yes	Yes	Yes
Determination of Need	Yes	No	Yes	Yes	Yes

Determination of Need for Commercial Services in the Pleasant/Lemesurier/Inian Islands Wilderness Area

Hoonah Ranger District, Tongass National Forest


Arthur Burbank, Hoonah District Ranger

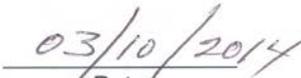

Date

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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:

- *Untrammelled – 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 3-1 shows the permitted outfitter/guide use activities and actual use that occurred on PLI Wilderness between 2007 to 2012.

Table F3-1. 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

TOTAL	174	158	78	105	124	207	842
1 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 F3-2. 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
Spirit Walker Expeditions of Alaska	04-11, 04-16	174	158	78	101	118	207
Alaska Mtn. Guides	04-11	0	0	0	0	0	0

South Passage Outfitters	04-16	0	0	0	0	0	0
Hobbit Hole Guest House	04-16	X	X	X	4	6	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

¹ 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 F3-3. Evaluation Process for Determination of Public Need

Remote Setting Nature Tours (RSNT)	
Criteria	Rating Summary
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
Camping	
Criteria	Rating Summary
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
Freshwater Fishing	
Criteria	Rating Summary
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
Big Game Hunting	
Criteria	Rating Summary
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

Table F3-4. Remote Setting Nature Tour needs.

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.
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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

Table F3-5. Camping Needs.

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

Table F3-6. Freshwater Fishing needs.

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

Table F3-7. Big Game Hunting needs.

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://fsweb.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

Table F3-8. Setting indicators, standards, and guidelines.

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 (grater 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

Table F3-9. Semi-Primitive motorized setting indicators, standards and guidelines.

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.

Determination of Need for Commercial Outfitter/Guide Services in the West Chicagof-Yakobi Wilderness

Sitka and Hoonah Ranger Districts, Tongass National Forest


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03/04/2014
Date


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3/4/14
Date

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Executive Summary

This document applies to the criteria of Section 4(d)6 of the Wilderness Act of 1964 (“Wilderness Act”) to determine which commercial recreation service activities may be necessary in the West Chichagof-Yakobi Wilderness.

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 commercial recreation service activities. It does not consider other commercial or noncommercial uses. The need for commercial recreation 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 six commercial recreation service activities in the West Chichagof-Yakobi Wilderness. Need was determined with a set of evaluation criteria that assessed the ability of activities to fulfill the purposes of the Wilderness Act and compatibility with preserving wilderness character. Market-generated demand for conducting outfitter and guide 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 the Tongass Land and Resource Management Plan (USDA Forest Service 2008b) management objectives. The following summarizes the findings.

Determination of Need for Commercial Service Activities:

- Big Game Hunting for Brown Bear commercial service activities **are necessary** in the West Chichagof-Yakobi Wilderness
- Big Game Hunting for Deer commercial service activities **are necessary** in the West Chichagof-Yakobi Wilderness
- Camping (including overnight use of public recreation cabins) commercial service activities **are necessary** in the West Chichagof-Yakobi Wilderness
- Floatplane Landing Tours commercial service activities **are not necessary** in the West Chichagof-Yakobi Wilderness
- Freshwater Fishing commercial service activities **are necessary** in the West Chichagof-Yakobi Wilderness
- Remote Setting Nature Tours commercial service activities **are necessary** in the West Chichagof-Yakobi Wilderness

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 West Chichagof-Yakobi 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. Guided activities will only be authorized to the extent consistent with the Wilderness Act’s direction to maintain wilderness character.

Introduction

The Forest Service has developed this needs assessment to determine the types of commercial outfitter/guide activities that could take place in the West Chichagof - Yakobi Wilderness (WCYW). A needs assessment is a methodology for determining if there is a ‘need’ for private enterprise to assist the agency in providing access, services and/or other assistance for the recreating public to enjoy National Forest wilderness areas. This document is tiered to the Tongass Land and Resource Management Plan (“Forest Plan”; USDA Forest Service 2008b) and the Determination of Need and Extent of Commercial

Uses within Wilderness Areas on the Tongass National Forest (USDA Forest Service 2007). Relevant management direction is provided in Appendix A.

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

Visitor capacity is the amount of recreational use (both commercial and non-commercial) an area can accommodate given the desired natural conditions, visitor experiences, and management program. Visitor capacity is an administrative process to identify the reasonable amount of recreation opportunities that are consistent with management direction for an area. Once a capacity is determined it can be used as a tool to develop a proposed action for allocating commercial outfitter and guide use and environmental analysis.

Environmental analysis document per *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. 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 meet the criteria.

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

The need for commercial services is determined by assessing the ability of activities to be compatible with the Wilderness Act of 1964 (“Wilderness Act”). A determination of need may be found where activities fulfill the purposes of the Wilderness Act and are compatible with preserving wilderness character. Market-generated demand for conducting outfitter and guide 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.

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 WCYW.
2. Is an internal analysis.
3. Does not analyze or mitigate potential environmental impacts from commercial outfitting and guiding activities.
4. Does not determine, establish, allocate or authorize commercial outfitter and guide services.

Outfitter/guides can serve as important partners for the Forest Service. In particular, they can provide wilderness awareness and leave no trace education for visitors that may not be reached by other educational efforts. Outfitter/guides can also assist with monitoring activities, such as reporting invasive plants and illegal activities; these activities help the Forest Service achieve a higher level of wilderness stewardship. Existing outfitter/ guide activities occurring in WCYW are authorized under the Shoreline Outfitter/Guide Record of Decision and Final Environmental Impact Statement (USDA Forest Service 2004). This decision is currently under review.

West Chichagof - Yakobi Wilderness

Area Description

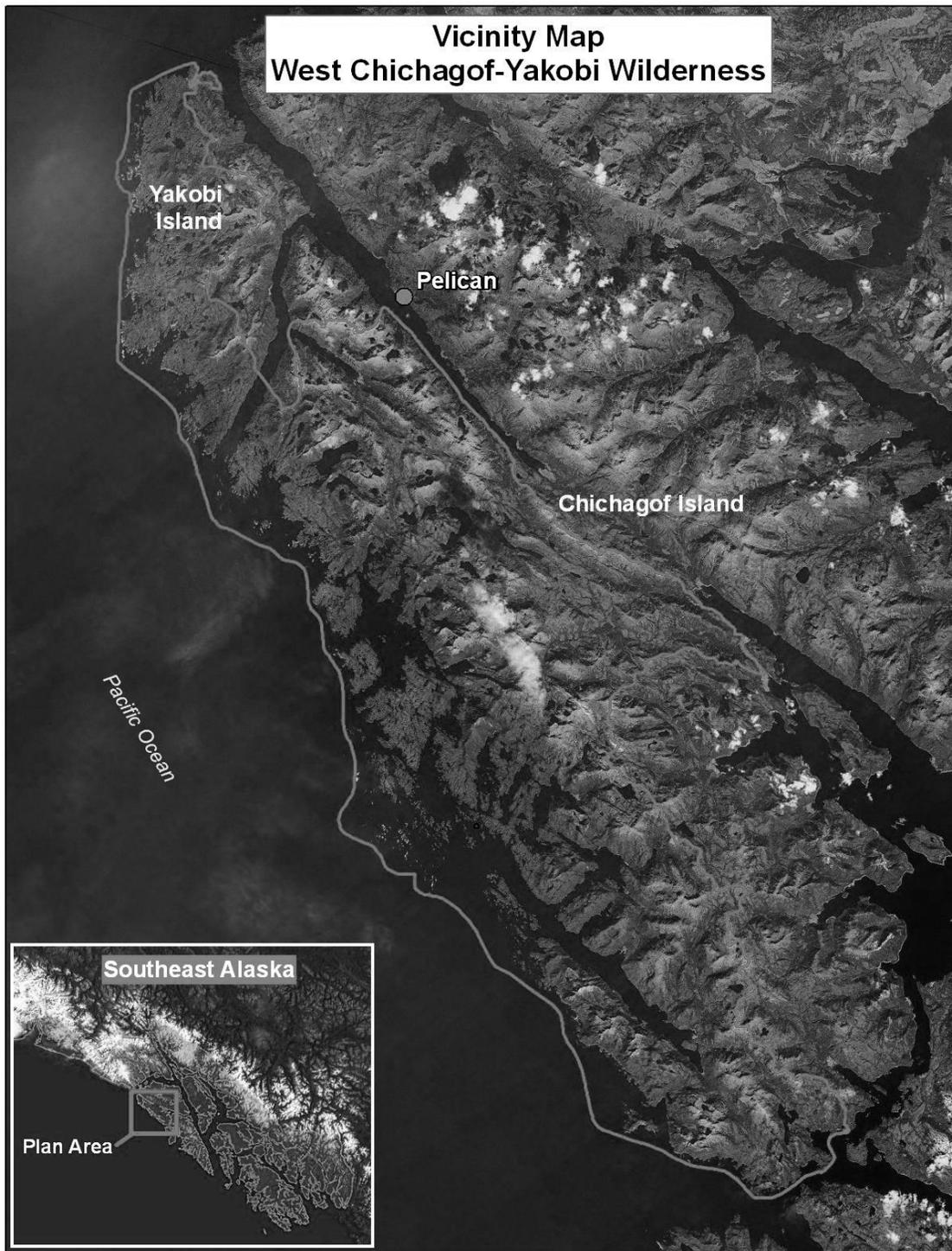
The West Chichagof-Yakobi Wilderness (WCYW) includes 265,286 acres of coastal temperate rainforest, bounded to the west by the Gulf of Alaska (Figure 1). The wilderness area spans approximately 60 miles of coastline and includes hundreds of smaller islands in close proximity to Chichagof and Yakobi Islands. The communities of Sitka and Hoonah are each about 30 miles distant from their nearest respective access to the wilderness. The village of Pelican lies only a short distance from the WCYW boundary.

WCYW consists of numerous sheltered bays and a wild outer coast. Western hemlock and Sitka spruce forests cover approximately one-third of the WCYW, with muskeg, alpine, and estuarine vegetation making up the rest. Sitka black-tailed deer are common and brown bears are frequently sighted, along with an abundance of smaller furbearing animals. Migratory waterfowl frequent WCYW in large numbers and marine mammals, including sea otters, sea lions, and seals, can be seen.

Long before the Russians came, Tlingit Indians began utilizing this area for its rich natural resources. Centuries of people's close relationship to the land have left behind mining cabins and equipment, remnants of fox farms, small communities, and Tlingit village sites. Remnants of past and current human presence include several mine adits, cabins, fish weirs, and trails.

The WCYW is remote and difficult to access and the wilderness character of the area is largely intact. There are concerns about the impacts of motorized transport, particularly floatplanes and motorized boats, in some areas of the WCYW. The Alaska National Interest Lands Conservation Act (ANILCA) allows for the use of motorized boats and planes to access WCYW, but does not discuss their use for commercial outfitting and guiding purposes. Ultimately, the Forest Service must ensure that the area is administered for the use and enjoyment of the American people leaving it unimpaired for future use and enjoyment as wilderness while protecting the area and preserving its wilderness character (Wilderness Act of 1964, Section 2(a)).

Figure F4-1. West Chichagof-Yakobi Wilderness vicinity map.



Commercial Visitor Use

Like many of the wilderness areas on the Tongass National Forest, WCYW is primarily accessed by float plane or boat. Weather, marine conditions, and terrain make this remote area difficult to access.

Thirty outfitter/guides were permitted and providing visitor services in the WCYW between 2008 and 2012; their activities provide services for forest visitors that are unfamiliar with Southeast Alaska's wilderness. Authorized outfitted and guided activities include big game hunting for brown bear and deer, remote setting nature tours (including hiking, beach use, hot spring use, and wildlife viewing), camping (including some overnight use at Greentop public recreation cabin), freshwater fishing, and outfitting.

Outfitter/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/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. Table 1 shows the type and amount of outfitter/guide use that occurred in WCYW between 2008 and 2012.

Table F4-1. Amount of service days¹ of outfitter and guide activities occurring in WCYW, 2008-2012.

Activity	2008	2009	2010	2011	2012	Average Annual Use 2008-2012
Big Game Hunting - Brown Bear	155	125	143	115	143	136
Big Game Hunting - Deer	0	0	0	13	0	3
Remote Setting Nature Tours (including hiking, hot spring, wildlife viewing, and beach use)	157	112	43	78	27	83
Freshwater Fishing	114	48	22	29	44	51
Camping	20	33	50	88	50	48
Outfitting	21	0	0	0	0	4
1 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.						

Almost half of the guided use occurring in WCYW involves day use brown bear hunting accessed via motorized boat. Guided brown bear hunters typically stay on a live-aboard boat during their hunt. In spring, they scan the shoreline beaches from their vessel before beginning their stalk. More use occurs in the uplands during the fall season when hunters can more easily travel by foot along streams. One brown bear hunting guide has reported occasional overnight use at Rust Lake.

Most guided deer hunting occurs in association with guided brown bear hunts. Clients are given the option of including a deer hunt as part of a package, with the target species still being brown bear. In recent years, however, there has been an increased interest in guided deer-only hunting.

The second most popular outfitter/guide activity occurring in WCYW between 2008 and 2012 was remote setting nature tours (including hiking, hot spring, wildlife viewing, and beach use). White Sulphur Springs is a popular location for guided visitors. Guides have also reported remote setting nature tour use at Takanis Lake, Green Top, Goulding Lake, Didrickson Bay, and Dry Pass Trails.

Guided camping (including overnight use at public recreation cabins) in WCYW has primarily involved visitors on kayak-based excursions and the majority of this use has occurred along the shoreline. Some overnight use has been reported at Green Top public recreation cabin; however other wilderness cabins are not currently available for commercial use. It is anticipated that lake visits from unguided visitors will continue to decrease due to transportation costs.

There are 13 businesses permitted and providing guided freshwater fishing in WCYW; not all service days are being utilized. Ford Arm is the most frequently fished location primarily during the steelhead run in April-May.

Outfitting has occurred infrequently in the WCYW since 2008. One operator has expressed an interest in providing transportation and outfitting services to visitors, but there has not been a large demand for this type of use.

Determination of Need for Commercial Services – 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 WCYW without an outfitter or guide because they lack the skills, knowledge, equipment, or ability to do so on their own, or they have safety concerns.
- There will be a continued demand for special use permits to conduct outfitter and guide operations in the WCYW. Access points and use locations are generally 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). There may also be shifts in use patterns (timing and location) and user types (hikers, backpackers, campers, day users, etc.).
- Visitor conflicts have the potential to increase if overall use increases. Conflicts are already occurring in some areas on the district, particularly between guided bear hunters and visitors participating in other types of activities (e.g. freshwater fishing, remote setting nature tours). Guided and unguided groups tend to participate in similar activities at similar locations.

Evaluation Criteria

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

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

Wilderness Dependence

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” (USDA Forest Service 2008b, p.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. Wilderness dependence may also be considered for 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.

This needs assessment is one part of a sequential process of evaluating commercial recreation use on NFS lands within wilderness. Applications for outfitter and guide use in WCYW must include adequate justification for why the proposed activity requires the use of wilderness.

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 specifies that “each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area” (Section 4(b)). The wilderness character of WCYW is largely intact due to the area’s remoteness, challenging terrain, and limited means of access. There are, however, some areas where wilderness character is affected by recreational use. Section 2(c) of the Wilderness Act defined the qualities of wilderness character that managers shall try to preserve, which include 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. The natural quality of wilderness character in WCYW is largely unaffected by past and present human activity; however there are some noted instances of affect. Red squirrels, marten, beaver, and non-native fish species have been introduced. Rainbow Trout were stocked in Elfendahl, Goulding, and Suloia Lakes. Thirteen non-native plant species, comprising 2.5 acres, have been documented. Forest Service employees have documented soil and vegetation impacts at a campsite on an unnamed lake at 920’ elevation as well as campsites near Ford Arm within WCYW.
- **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.

The past and current presence of humans is evident in WCYW; several mine adits, permitted cabins, and private inholdings exist. Developments include an abandoned cabin at Klag Ballard Claim, two fish weirs (Ford Arm and Klag Bay), two isolated cabins (Klag and Lake Anna), and two agricultural residences at Greentop. There are also several old mine sites at Cook, Branson, Herbert Graves, Falcon, and Cobol and three large-scale developments, including Boomer Mine Road, Sisters Lake Powerhouse, and Chichagof Mine (inholding). Unauthorized structures have

occurred at Lower Goon Dip Lake, Lake Elfendahl, and Ford Arm, which have a localized impact on the undeveloped quality of wilderness character.

The Forest Service maintains four public recreation cabins in WCYW, including White Sulphur Cabin and Bathhouse, Greentop, Goulding Lake, and Suloia Lake Cabins. Impacts at cabins and dispersed campsites include tree damage, litter, fire rings and duff fires, and social trails. Outfitters and guides are required to practice Leave No Trace to minimize their impacts.

In general, there is less evidence of human occupation or modification as one travels inland from the shoreline zone. Outfitter and guide activities that require the use of temporary or permanent structures, or create noticeable impacts on the ground, have the potential to further impact the undeveloped quality of wilderness character in WCYW.

- **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.

Noise associated with motorized transport (e.g. motorized boats and float planes) has the potential to diminish wilderness character by reducing opportunities for solitude. While some motorized activities occur in the air and on the marine waters adjacent to WCYW, and are outside of Forest Service jurisdiction, other activities (e.g. floatplane landings on lakes and shoreline excursions associated with motorized transport) are within Forest Service jurisdiction and require a special use authorization.

Surveys undertaken at the lakes in WCYW between 2003 and 2008 indicate that opportunities for solitude are outstanding at most lakes. There is, however, limited useable space on most lakes. For other areas, conflicts may occur between visitors, particularly during steelhead fishing season (April - May) and the spring and fall bear hunting seasons.

In general, outstanding opportunities for solitude exist throughout WCYW, particularly in the interior portions of the larger islands and Chichagof Island. These areas receive fewer visitors due to the lack of facilities and difficult lake landings and are away from the primary marine travel routes and popular commercial fishing anchorages.

- **Other Features of Value.** *This quality pertains to distinct features fundamental to the wilderness character that are not contained within the other qualities.* This aspect is based on the last clause of Section 2(c) in the 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. The following unique qualities are associated with WCYW:

- **Brown Bear** - Admiralty, Baranof, and Chichagof Islands together are considered unique due to the singular large predator (brown bear) dominating these landscapes.
- **White Sulphur Springs** offers a unique soaking experience on the outer pacific coast that dates back to the early 1900s. This site has been determined eligible for the National Register of Historic Places for Traditional and Cultural Values based on its importance to the communities that have historically used the site. Four generations of residents from the communities of Pelican, Elfin Cove, and Gustavus have used the site for community and family gatherings; the commercial fishing fleet has used the site for decades to celebrate season opening and closings, and for bathing and washing.

- **Historic and Pre-Historic Values** - Since pre-historic times the lands within the WCYW have supported a broad range of human use, development and occupancy. Thousands of years ago West Chichagof became an area of seasonal habitation by local native peoples. Little is known about the prehistoric use of the present-day wilderness. There are a few documented prehistoric sites, but surveys have been very limited. Later, Russians and Americans arrived. Despite the continual presence by humans, the wilderness character of the area remained virtually uncompromised until the late 1890s when extensive mineral prospecting began in southeast Alaska. From then until the late 1950s the outer coast supported numerous small settlements associated with mining, fur farms, fishing and services in support of these activities. Since 1950, however, most of these activities have been discontinued and many of the sites are being reclaimed by nature.
- **Subsistence Use** - Gathering wild food and other items has been an integral part of the way of life in southeast Alaska for thousands of years. At one time or another, the entire coastal zone of the WCYW has been used for subsistence gathering. Traditionally, Hoonah residents have used the Cape Bingham area and the mouth of Lisianski Strait for harvesting sea mammals. Waterfowl and game were harvested around the mouth of Lisianski Strait. Waterfowl was harvested in the White Sulphur area. Pelican residents used Stag Bay, Lisianski Inlet and Lisianski Strait for the taking of personal-use timber and in the early part of the century; mining operations in and around Klag Bay resulted in subsistence use of that area as well. Today, residents of Hoonah, Pelican, Elfin Cove, and Gustavus still depend a great deal on subsistence gathering activities. In general, the entire area is used for the harvest of seal and sea otter by groups exempt from the Marine Mammal Protection Act; Lisianski Inlet, Lisianski Strait and Stag Bay are used for harvesting game animals, fish and furbearers. A variety of subsistence activities occur in the Hoktaheen, Takanis and Surge Bay areas on Yakobi Island and the Klag Bay, Ford Arm and Leo's Anchorage areas on Chichagof Island.
- **Early roots of environmentalism in Alaska** - The Sitka Conservation Society, an environmental/community advocacy organization based in Sitka, was formed in 1967 around the establishment of the West Chichagof-Yakobi Wilderness. The special qualities of this place inspired a group of Sitka residents to develop the first citizens' proposal for establishment of a wilderness area in Alaska. This initial effort resulted in the designation of West Chichagof-Yakobi Wilderness under ANILCA in 1980.

In general, outstanding opportunities exist in WCYW for hunting and viewing brown bear, for exploring the history of the area at numerous historic sites, for subsistence gathering, and for experiencing the special qualities that led to the proposal and designation of the area as wilderness. Recent improvements to White Sulphur Springs bathhouse and cabin will ensure that another generation of visitors can continue their traditions associated with this site. However, the other historic sites that exist across the WCYW landscape are slowly being reclaimed by nature and will eventually cease to exist. With the exception of White Sulphur Springs, the Forest Service does not have plans to restore or maintain any of the features associated with the other existing historic sites. Thus, the history that is documented will be retained, but the features themselves have a limited lifespan and will eventually fade.

Knowledge, Skills, and Equipment Required

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, while still achieving a level of

self-reliance and challenge 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, and the amount of use currently occurring. Market-generated demand for conducting outfitter and guide activities does not, by itself, constitute a need for commercial services. However, the determination of public need for a service is informed by examining current and past use trends.

Public Purposes / Management Objectives

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 also 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. Guides can serve as important partners for the Forest Service by providing wilderness awareness education and training in outdoor skills and ethics. Consideration will also be given to the compatibility of commercial use with use by the general public.

Determination of Need for Commercial Services by Activity

Activities Considered

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

- Big Game Hunting for Brown Bear
- Big Game Hunting for Deer
- Camping (including overnight use of public recreation cabins)
- Floatplane Landing Tours
- Freshwater Fishing
- Remote Setting Nature Tours

This assessment may be revised in the future as recreation use patterns change and demands for new outfitter/guide services are identified.

Big Game Hunting – Brown Bear

Brown bear hunting includes day use and overnight activities in the wilderness. Activities incidental to the primary brown bear hunt may involve camping, remote setting nature tour activities, freshwater fishing, or hunting for lower value game and waterfowl species.

Table F4-2. Brown Bear Hunting needs.

Evaluation Criteria	Evaluation of Need
Wilderness Dependence	Guide Use Areas (GUAs) 04-13, 04-14, and 04-15 encompass the WCYW. GUAs 04-13 and 04-15 have large tracts of non-wilderness NFS lands with suitable bear habitat and hunting opportunities. GUA 04-14 is entirely within wilderness. The closest private lands to WCYW are located in the town of Pelican and at Soapstone Cove. A limited amount of private land (Shee Atika Incorporated) may be available in Katlian Bay (north of Sitka) for bear hunting. Permission would need to be secured from the landowner.
Wilderness Character	The majority of guided hunting in WCYW and surrounding areas on the Tongass National Forest is boat-based and results in minimal impacts to vegetation, soil, and water resources. Guided groups typically stay aboard a boat and hike up streams and very little use occurs in the uplands. The Alaska Department of Fish and Game (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. Guided hunting groups have the potential to impact the undeveloped quality of wilderness if tent platforms are constructed or remain in place when not in use. Guided groups also have the potential to impact opportunities for solitude, particularly if access is by motorized boat or floatplane, and use occurs in popular areas. Conflicts have been reported on other parts of the district between guided bear hunting groups and other permitted users, such as freshwater fishing and remote setting nature tour groups. Conflicts with unguided visitors are less common as brown bear hunting is not a popular unguided activity.
Skills, Equipment, and Knowledge Required	Visitors primarily access the WCYW using motorized boats or float planes. Outfitters and guides can provide the skills, equipment, and knowledge required to safely access and enjoy the wilderness. 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 considered to be 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, particularly with brown bear, also pose a risk to safety. Guides know how to track and retrieve animals, carry radios and/or satellite phones for communication, and carry back-up rifles in case of emergency.
Outfitter and Guide Demand and Utilization	There is consistently high demand for guided brown bear services in WCYW. Between 2008 and 2012, nearly half of the guided use in WCYW was for brown bear hunting. Most authorizations are being fully utilized by existing guides. There are also several prospective applicants should more guided brown bear hunts become available. Most guides are booked years in advance for these hunts.
Public Purposes & Special Management Objectives	Guided brown bear hunting contributes to the recreational purpose of wilderness. Guides can also help the ADF&G male to female harvest ratio objectives and ensure that hunters care for and process carcasses in accordance with State law. Guide hunt records also help track harvest locations and success rates, contributing to better management of bear populations.

Outfitter/guides provide access to brown bear hunting opportunities in WCYW that would otherwise be unavailable to many members of the visiting public because of the high level of knowledge, skills, and

equipment needed to safely conduct a remote hunt. Outfitters and guides also help the Forest Service meet special management objectives for dispersing impacts related to nonresident harvest. This activity contributes to the recreational purpose of wilderness and has little resource concerns. These factors, along with the State of Alaska’s requirement for non-resident hunters to be accompanied by a licensed guide, indicate there is a need for outfitter/guide brown bear hunting services in WCYW. Guides operating in WCYW will be required to educate clients about low-impact skills to minimize impacts to the natural and undeveloped qualities of wilderness character.

Big Game Hunting – Deer

Deer hunting includes day use and overnight activities in the wilderness. Activities incidental to the primary deer hunt may involve camping, remote setting nature tour activities, freshwater fishing, or hunting for lower value game and waterfowl species.

Table F4-3. Deer Hunting needs.

Evaluation Criteria	Evaluation of Need
Wilderness Dependence	Guide Use Areas (GUAs) 04-13, 04-14, and 04-15 encompass the WCYW. GUAs 04-13 and 04-15 have large tracts of non-wilderness NFS lands with suitable deer habitat and hunting opportunities. GUA 04-14 is entirely within wilderness. The closest private lands to WCYW are located in the town of Pelican and at Soapstone Cove. A limited amount of private land (Shee Atika Incorporated) may be available in Katlian Bay (north of Sitka) for deer hunting. Permission would need to be secured from the landowner.
Wilderness Character	The majority of guided hunting in WCYW and surrounding areas on the Tongass National Forest is boat-based and results in minimal impacts to vegetation, soil, and water resources. Guided groups typically stay aboard a boat and hike up streams and very little use occurs in the uplands. 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. Guided hunting groups have the potential to impact the undeveloped quality of wilderness if tent platforms are constructed or remain in place when not in use. Guided groups also have the potential to impact opportunities for solitude, particularly if access is by motorized boat or floatplane, and use occurs in popular areas. Currently, conflicts are uncommon with guided deer hunters and non-guided or subsistence hunters due to the limited amount of use that has occurred. However, subsistence use has historically occurred in this wilderness area and is identified as an Other Feature of Value. If demand increases, consideration will be needed for subsistence users.
Skills, Equipment, and Knowledge Required	Visitors primarily access the WCYW using motorized boats or float planes. Outfitters and guides can provide the skills, equipment, and knowledge required to safely access and enjoy the wilderness. A guide can ensure that State regulations and ethical hunting procedures are followed. Guides are also knowledgeable about deer behavior and where conflicts with unguided visitors may occur. There is no State requirement for a registered guide for deer hunting.
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, particularly with brown bear, also pose a risk to safety. There have been documented incidents of deer hunters being attacked by brown bear. Guides carry radios and/or satellite phones for communication and back-up rifles in case of emergency.
Outfitter and Guide Demand and Utilization	Between 2008 and 2012, there was a low level of demand for guided deer hunting. Most guided deer hunting occurs as incidental take to a bear hunt, or as part of combination hunt for bear and deer. Recently, there has been an increased demand for adding deer-only hunts to existing big game hunting permits.
Public Purposes &	Guided deer hunting contributes to the recreational purpose of wilderness. Guide

Special Management Objectives	hunt records help track harvest locations and success rates, contributing to better management of deer populations. Guides can also teach clients about low-impact camping and hiking skills.
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Outfitter/guides provide access to deer hunting opportunities in WCYW that would otherwise be unavailable to many members of the general public because of the high level of knowledge, skills, and equipment needed to safely conduct a remote hunt. Outfitters and guides also help the Forest Service meet special management objectives for dispersing impacts related to nonresident harvest. This activity contributes to the recreational purpose of wilderness and results in limited impacts to Forest resources, including wilderness character. These factors indicate there is a need for outfitter/guide deer hunting services in WCYW.

Camping (including overnight use of public recreation cabins)

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.

Table F4-4. Camping needs.

Evaluation Criteria	Evaluation of Need
Wilderness Dependence	Opportunities for guided camping exist in the non-wilderness portion of the Sitka Ranger District and surrounding areas of the Tongass National Forest. Wilderness, however, provides the remote wild land setting desired for this type of activity. Wilderness also provides an opportunity for guided visitors to practice Leave No Trace camping skills and learn about outdoor ethics. Camping opportunities are limited on non-NFS lands; some opportunities may exist at Katlian Bay (Shee Atika Incorporated), and nearby Magoun Islands, Sea Lion Cove, and Big Bear Baby Bear State Parks.
Wilderness Character	Guided camping generally occurs on the beaches along the shoreline of WCYW and results in minimal impacts to vegetation, soil, and water resources. There are some locations where impacts to vegetation and soil are noticeable. There is also 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 (e.g., White Sulphur Springs). Many of the lakes in WCYW are small and can only accommodate one group for camping. Motorized boat traffic along adjacent waterways also has the potential to reduce opportunities for solitude. Guided camping tours do not affect the untrammelled and undeveloped qualities of wilderness character. Guided camping may increase the size of existing campsite boundaries. Firewood collection for campfires could occur, resulting in “human browse lines” or stumps. Stipulations for waste disposal and use of fire pans would have to be added to permits to ensure degradation of areas did not occur.
Skills, Equipment, and Knowledge Required	Camping visitors primarily access the WCYW using kayaks, motorized boats or float planes, including charter services. Outfitters may also provide camping equipment that visitors do not have. 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. Camping (including stays at remote wilderness public use cabins) involves skills that embrace traditional techniques and include elements of risk and challenge, especially for those new to the activity. It encourages self-reliance and helps strengthen independent decision-making.

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, however there are parts of WCYW that provide more protected waters and suitable locations for sheltering from the weather. Wildlife encounters also pose a risk to safety. Outfitters and guides may provide communication with rescue services in the event of an emergency.
Outfitter and Guide Demand and Utilization	There is demand for guided camping services in the WCYW. Between 2008 and 2012, an average of 48 service days annually was reported for this guided activity. The shoreline areas in this wilderness provide desirable recreation settings for this type of activity. There have been no commercial use requests for fly-in non-hunting related camping, with the exception of cabin camping, at any lakes in WCYW.
Public Purposes & Special Management Objectives	Guided camping tours provide an opportunity for the visiting public to safely access and enjoy the WCYW for recreational pursuits. Multiple day experiences allow visitors to forge deep connections with nature. 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. Forest Plan direction for public use cabins located in wilderness is to maintain them at present or improved condition. However, high costs of maintenance for low-use cabins are becoming prohibitive. An opportunity exists for partnerships with guides to perform deferred maintenance on low-use cabins or provide firewood. Guides who pursue this activity could educate visitors on the use of primitive tools as well as the enabling legislation, which allows for these structures in wilderness.

In summary, guided camping generally occurs on the beaches and along the shoreline of WCYW and results in minimal impacts to vegetation, soil, and water resources. Wilderness provides an opportunity for guided visitors to practice traditional skills, learn about outdoor ethics, and forge deep connections with nature. Backcountry camping experiences depend on a wild land setting and are consistent with management of the area as wilderness. 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 outfitter/guide camping services in WCYW.

There is a potential for guided groups to impact opportunities for solitude in the wilderness, particularly if the groups are large, use is authorized in popular locations (e.g., White Sulphur Springs), and access is via motorized transport. Group size will be limited to twelve in non-cabin locations and six to eight persons at cabins (depending on cabin capacity). Permit stipulations will be designed to reduce potential conflicts with unguided visitors. Preference will be given to operators that access the wilderness using non-motorized transport, that promote Leave No Trace and outdoor ethics, and educate their clients about wilderness values.

Floatplane Landing Tours

A floatplane landing tour is defined 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. Visitors typically spend little time on land at each stop. Floatplane landing tours do not include authorized point-to-point floatplane transport used as an ancillary service to another commercial service for activities such as remote setting nature tours, hunting, fishing, or camping (including public use cabins).

Table F4-5. Floatplane Landing needs.

Evaluation Criteria	Evaluation of Need
Wilderness Dependence	Floatplanes are a common and allowed method of transport for recreation use on the Tongass National Forest. However, the authorization of floatplane landing tours on the Tongass National Forest is limited and has not been authorized within the WCYW. Misty Fiords National Monument provides a high number of service

	<p>days for operators with lake landings. There are also several air taxi companies who provide this service without lake landings. In addition, several lakes exist outside of wilderness that offer sightseeing in a lake environment, for example, Rosenburg, Cold Storage, and Hogan Lakes.</p>
Wilderness Character	<p>This activity is entirely dependent on the use of floatplanes. ANILCA Special Access provisions (Section 1110(a)) specifically allow for the continued use of airplanes for traditional activities and travel to and from villages and homesites. Recreation activities, such as sightseeing, are considered “traditional” as defined in Forest Service Manual 2326.1(6) (USDA Forest Service 2008a). As such, the presence of floatplanes in WCYW is an accepted method of access and does not constitute a degradation of the undeveloped quality of wilderness character.</p> <p>However, the frequency and duration of floatplane use can affect outstanding opportunities for solitude or primitive and unconfined recreation. Repeated landings at locations within wilderness by floatplane landing tour activities are not compatible with preserving these outstanding opportunities. The higher incidence of floatplane flights and landings that are associated with floatplane landing tours degrades the opportunities for those visitors seeking to experience the natural sounds of the wilderness and primitive recreation.</p>
Skills, Equipment, and Knowledge Required	<p>Floatplane landing tours typically do not require a high degree of specialized skill, equipment or challenge for the forest visitor. Visitors typically step off the plane and explore the nearby area on foot, spending a short amount of time in the wilderness before re-boarding the plane. However, this activity does require an aircraft and pilot with experience in the challenging flying conditions of southeast Alaska. The average person would not have this equipment or skill and commercial services are typically needed for this activity.</p>
Visitor Safety	<p>Any activity that exposes people to southeast Alaska’s wind, rain, and cold weather conditions poses a threat to visitor safety if visitors are unprepared. Wildlife encounters may also pose a risk to safety. Hazards that people could encounter include brown bears, sudden weather changes, uneven terrain, falls and hypothermia. Since the time spent out of the plane is relatively brief and groups typically stay close to the landing site, risk of hypothermia and exposure to the elements is low.</p>
Outfitter and Guide Demand and Utilization	<p>No outfitter/guides have been authorized for floatplane landing tours in WCYW. There have been no commercial use requests for this activity.</p>
Public Purposes & Special Management Objectives	<p>This activity predominantly involves viewing natural features from the air and landing for only short periods of time within the wilderness. 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. Although floatplanes are an accepted method of access in WCYW, the activity itself does not fulfill the purposes of wilderness that strives for invoking opportunities for spirituality and/or allow for deep connections with nature.</p>

In summary, floatplane landing tours do not offer opportunities for self-reliance and challenge to the wilderness visitor. This activity is entirely dependent on the use of aircraft to view the wilderness from the air with short periods of time on the ground. Although the method of access is allowed, the activity itself degrades outstanding opportunities for solitude or primitive types of recreation, and does not provide visitors the opportunity for developing deep connections with nature. There is not a need for outfitter/guide floatplane landing tour services in WCYW.

Freshwater Fishing

Freshwater fishing includes both catch-and-take and catch-and-release methods under Alaska sport fishing regulations (excludes commercial and subsistence fishing). This use depends on places and times where anadromous and resident fish are located.

Table F4-6. Freshwater Fishing needs.

Evaluation Criteria	Evaluation of Need
Wilderness Dependence	Several streams in non-wilderness NFS lands on the Sitka Ranger District and surrounding areas of the Tongass National Forest support anadromous fish populations and provide excellent freshwater fishing opportunities, including the North Arm of Hoonah Sound, Sitkoh, Nakwasina, Salmon Lake, and Lake Eva river systems. Opportunities for fishing on non-NFS lands are limited, but include Katlian Bay (Shee Atika Incorporated) and possibly State park areas. The nearest non-wilderness lakes are located on the east side of Chichagof Island and north of Sitka, where fishing opportunities are limited. Catch & release steelhead fishing is a guided activity that is desired throughout southeast Alaska and there are a limited number of primary steelhead streams available, one of which is in WCYW.
Wilderness Character	The majority of guided freshwater fishing is accessed via motorized boat and results in minimal impacts to vegetation, soil, and water resources. Current resource concerns at streams include litter, development of “fishing paths,” and wildlife displacement. There have been some concerns over habituation of bears in site-specific areas on the Sitka district. ADF&G provides sport fishing guidelines that help maintain the natural quality of wilderness character through the sustainable management of fish populations. Guided groups have the potential to impact opportunities for solitude, particularly if the groups are large and use is authorized in popular locations (e.g., Ford Arm). Many of the lakes in WCYW are small and can only accommodate one or two groups for fishing. Visitor conflicts may occur, particularly during steelhead fishing season (April-May). Access via motorized boat or floatplane has the potential to impact opportunities for solitude.
Skills, Equipment, and Knowledge Required	Visitors primarily access the WCYW 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. Navigating and route-finding in steep, brushy terrain may also be beyond the skill level of many visitors. Outfitter/guides can impart knowledge of catch and release techniques, where and when the fish runs are occurring, fish identification, and proper disposal methods.
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.
Outfitter and Guide Demand and Utilization	There are several streams and a few lakes that support anadromous fish species in the WCYW. Average annual guided use is 51 service days. There are 13 permitted guides providing freshwater fishing services in WCYW. Not all service days are being utilized. The current level of use for fishing is low depending on the area and species. There is potential for conflicts especially in fall and spring during guided bear hunts and during times of subsistence fish harvest (June 1 – August 15 at Klag Bay and Ford Arm).
Public Purposes & Special Management Objectives	Guided freshwater fishing contributes to the recreational purpose of wilderness. Outfitter/guides promote proper catch and release techniques and an understanding of population dynamics in isolated streams and lakes. Outfitter/guides are required to turn in freshwater fishing logs to ADF&G; the results of these can be used to determine non-resident fishing harvest.

WCYW provides outstanding opportunities for remote freshwater fishing. Fishing is an appropriate use of wilderness and outfitter/guides contribute to the recreational purpose of wilderness. Guides can assist

visitors by navigating and route-finding in steep, brushy terrain and teach low-impact practices. Guides also impart knowledge of catch and release techniques, where the runs are occurring, fish identification and proper disposal methods. There is a need for outfitter/guide freshwater fishing services in WCYW. Preference will be given to outfitter/guides that promote Leave No Trace and outdoor ethics and educate their clients about wilderness values.

Remote Setting Nature Tours

Remote setting nature tours encompass, but are not limited to, a wide variety of day use activities such as hiking, paddling, wildlife viewing, photography, exploring, sightseeing, hot springs soaking, and cultural tours. Visitors may spend 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.

Table F4-7. Remote Setting Nature Tour needs.

Evaluation Criteria	Evaluation of Need
Wilderness Dependence	There are opportunities for guided remote setting nature tours (RSNT) on non-wilderness NFS lands on the Sitka Ranger District and surrounding areas of the Tongass National Forest. For example, Rosenberg, Cold Storage, and Hogan Lakes can provide sightseeing and hiking opportunities at a lake environment. There are also outstanding hiking opportunities to the north of Sitka at non-wilderness locations including Bohemia Basin, Lisianski Trail, Lake Eva, Kruzof Island, Sitkoh, and Kook Lake. Guides currently offer tours in all of these areas. RSNT opportunities are limited on non-NFS lands; some opportunities exist at Katlian Bay (Shee Atika Incorporated), nearby State parks including an outstanding trail to Sea Lion Cove. Guides currently offer hikes in some of these non-NFS locations. However, wilderness provides the remote, wild land setting often desired for these activities. WCYW in particular provides visitors the opportunity to learn about and experience the cultural history features and rural Alaskan lifestyle that is unique to this wilderness.
Wilderness Character	RSNTs occurring in the WCYW are primarily boat-based and use is generally concentrated on beaches and along established trails. It is rare that most visitors participating in RSNT travel more than one-half mile from shorelines unless there is an established trail. As a result, these activities typically result in minimal impacts to vegetation, soil, and water resources. However, potential resource concerns include repeated use on unprotected native tread (e.g., muskeg and forested wetlands), user-created trails and trail marking (e.g. flagging and rock cairns), particularly in areas with interesting features and recreation attractions. The potential for vegetative damage and soil erosion exists. There is also a potential for outfitted/guided groups to impact opportunities for solitude in the wilderness, particularly if the groups are large, use is authorized in popular locations, or access is by motorized boat or float plane. Impacts to opportunities for solitude and primitive and unconfined recreation will be most noticeable in areas where visual screening from vegetation and topography is low.
Skills, Equipment, and Knowledge Required	Visitors primarily access the WCYW using boats or float planes. Outfitters and guides can provide the skills, equipment, and knowledge required to safely access and enjoy the wilderness. Equipment for day hiking (e.g. rain gear, footwear, warm clothing) can be obtained at relatively inexpensive prices at stores nationwide. Air taxi services can drop off and pick up visitors at locations of their choice, but without local knowledge of the landscape, it may be difficult for a visitor to identify suitable locations for this activity. Outfitters/ guides can provide the skills, equipment, and knowledge required to safely access the wilderness.

Visitor Safety	While hiking and beach walking are simple skills, 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 if visitors are unprepared. Wildlife encounters may also pose a risk to safety. Hazards that people could encounter include brown bears, sudden weather changes, steep terrain, falls and hypothermia. Risk to safety and the physical and emotional challenges of surviving in this environment are high.
Outfitter and Guide Demand and Utilization	Fourteen outfitter/guides are currently permitted and providing RSNTs in WCYW. Of these, not all service days are being utilized and most of the use is occurring at White Sulphur Springs and along the shoreline zone surrounding protected bays and beaches. Use of the uplands is low, but operators have expressed an interest in providing hiking tours on trails that provide access to the upland portion of the wilderness from saltwater, as well as floatplane access to lakes.
Public Purposes & Special Management Objectives	Guided RSNTs provide an opportunity for the visiting public to safely access and enjoy WCYW for recreational pursuits. Outfitters/guides providing RSNTs emphasize Leave No Trace skills and outdoor ethics. RSNTs depend on a wild land setting and are consistent with management of the area as wilderness. Guides authorized to operate in wilderness are required to educate clients about Leave No Trace outdoor ethics. For example, a guide could encourage clients to spread out in alpine and muskeg areas rather than walk single file. Additionally, an opportunity exists for partnerships with guides to perform deferred maintenance on low-use wilderness trails that are becoming cost-prohibitive to maintain.

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, use is authorized in popular locations (e.g., White Sulphur Springs), and access is via motorized boat or float plane. Guides can assist visitors by navigating and route-finding in steep, brushy terrain and teach low-impact practices. Outfitter/guides provide visitors with the skills, equipment, and knowledge required to safely access and enjoy the wilderness while still achieving a high level of self-reliance and challenge in the activity. There is a need for outfitter/guide remote setting nature tour services in SBW. Preference will be given to outfitter/guides that promote Leave No Trace and outdoor ethics, educate their clients about wilderness values, use smaller group sizes, and use non-motorized transport. Group size will be limited to twelve and permit stipulations will be designed to reduce potential conflicts with unguided visitors as well as minimize impacts to soils and vegetation.

Citations

ANILCA, 1980. Alaska National Interest Lands Conservation Act, Public Law 96-487, 96th Congress.

USDA Forest Service, 2008a. Forest Service Manual, Alaska Region (Region 10), FSM 2300 – recreation, wilderness and related resource management, chapter 2320 – wilderness management. November 14, 2008.

USDA Forest Service, 2008b. Tongass National Forest Land Resource and Management Plan. January 2008. R10-MB-603b.

USDA Forest Service, 2007. Determination of Need and Extent of Commercial Uses within Wilderness Areas on the Tongass National Forest.

USDA Forest Service, 2004. Shoreline Outfitter/Guide Record of Decision and Final Environmental Impact Statement. December 2004. R10-MB-519a.

Wilderness Act, 1964. Public Law 88-577. 19 U.S. C. 1131-1136. 88th Congress.

Appendix A. 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)

In 1990, the Tongass Timber Reform Act (TTRA) amended ANILCA and designated two new wilderness areas. Section 707 of ANILCA specifies that, “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 that apply to this assessment include:

- (1) Section 811 – Reasonable access for subsistence resource uses.
- (2) 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.
- (3) 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.
- (4) Section 1303(b)(2) – Allowance for the continuation of existing cabins.
- (5) Section 1307(b) – Provides a preference for providing visitor services (except for fishing and hunting) within conservation system units to Native Corporations and local residents.

- (6) Section 1315(c) – Allows for the permitting, maintenance, replacement, and continued use of public use cabins.
- (7) 1315(d) allows for the construction of new cabins if they are necessary for the protection of public health and safety.
- (8) Section 1316(a) – Allows for existing and future establishment of temporary structures necessary for the taking of fish and game subject to reasonable regulation to insure compatibility, the continuance of existing uses, and the future establishment, and use, of temporary campsites, tent platforms, shelters, and other temporary facilities and equipment directly and necessarily related to such activities.
- (9) 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.”

Forest Service Manual and Handbook 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:

- (1) 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;
- (2) Administer special uses based on resource management objectives and sound business management principles;
- (3) Develop and maintain a well-trained workforce to properly manage and administer special uses; and
- (4) Facilitate the delivery of recreational opportunities on National Forest System lands for services not provided by the Forest Service.

Forest Service Special Uses objectives specifically for outfitting and guiding, provided in FSH 2709.14, Chapter 50, Section 53.1b states:

- (1) 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.
- (2) Facilitate greater participation in the outfitting and guiding program by organizations and businesses that work with youth and educational groups.
- (3) 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 Uses policy for outfitting and guiding provided in FSH 2709.14, Chapter 50, Section 53.1c states:

- (1) 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.
- (2) 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.
- (3) 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).
- (4) 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:

- (1) 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.
- (2) Provide outstanding opportunities for solitude or a primitive and unconfined type of recreation.

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

- (1) 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.
- (2) Use information, interpretation, and education as the primary tools for management of wilderness visitors.
- (3) Manage for recreation activities that are dependent on the wilderness environment so that a minimum of adaptations within wilderness are necessary to accommodate recreation.
- (4) 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.

Tongass National Forest Land and Resource Management 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.

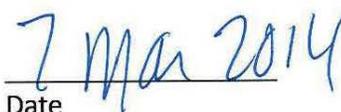
The Forest Plan notes that; “Special Use Authorizations permitting individuals or organizations to provide visitor services in wilderness may be issued if there is a demonstrated need for the service(s) and they are deemed appropriate for the area proposed.”

Determination of Need for Commercial Outfitter/Guide Services in the South Baranof Wilderness

Sitka Ranger District



CAROL A. GOULARTE
Sitka District Ranger



Date

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Executive Summary

This document applies to the criteria of Section 4(d)6 of the Wilderness Act of 1964 (“Wilderness Act”) to determine which commercial recreation service activities may be necessary in the South Baranof Wilderness.

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 commercial recreation service activities. It does not consider other commercial or noncommercial uses. The need for commercial recreation 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 seven commercial recreation service activities in the South Baranof Wilderness. Need was determined with a set of evaluation criteria that assessed the ability of activities to fulfill the purposes of the Wilderness Act and compatibility with preserving wilderness character. Market-generated demand for conducting outfitter and guide 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 the Tongass Land and Resource Management Plan (USDA Forest Service 2008b) management objectives. The following summarizes the findings.

Determination of Need for Commercial Service Activities:

- Big Game Hunting for Brown Bear commercial service activities **are necessary** in the South Baranof Wilderness
- Big Game Hunting for Deer commercial service activities **are necessary** in the South Baranof Wilderness
- Big Game Hunting for Mountain Goat commercial service activities **are necessary** in the South Baranof Wilderness
- Camping (including overnight use of public recreation cabins) commercial service activities **are necessary** in the South Baranof Wilderness
- Floatplane Landing Tours commercial service activities **are not necessary** in the South Baranof Wilderness
- Freshwater Fishing commercial service activities **are necessary** in the South Baranof Wilderness
- Remote Setting Nature Tours commercial service activities **are necessary** in the South Baranof Wilderness

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 South Baranof 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. Guided activities will only be authorized to the extent consistent with the Wilderness Act’s direction to maintain wilderness character.

Introduction

The Forest Service has developed this needs assessment to determine the types of commercial outfitter/guide activities that could take place in the South Baranof Wilderness (SBW). A needs assessment is a methodology for determining if there is a ‘need’ for private enterprise to assist the agency in providing access, services and/or other assistance for the recreating public to enjoy National Forest

wilderness areas. This document is tiered to the Tongass Land and Resource Management Plan (“Forest Plan”; USDA Forest Service 2008b) and the Determination of Need and Extent of Commercial Uses within Wilderness Areas on the Tongass National Forest (USDA Forest Service 2007). Relevant management direction is provided in Appendix A.

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

Visitor capacity is the amount of recreational use (both commercial and non-commercial) an area can accommodate given the desired natural conditions, visitor experiences, and management program. Visitor capacity is an administrative process to identify the reasonable amount of recreation opportunities that are consistent with management direction for an area. Once a capacity is determined it can be used as a tool to develop a proposed action for allocating commercial outfitter and guide use and environmental analysis.

Environmental analysis document per 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. 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 meet the criteria.

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

The need for commercial services is determined by assessing the ability of activities to be compatible with the Wilderness Act of 1964 (“Wilderness Act”). A determination of need may be found where activities fulfill the purposes of the Wilderness Act and are compatible with preserving wilderness character. Market-generated demand for conducting outfitter and guide 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.

This needs assessment:

1. Determines the need for various activities of commercial outfitter and guide services based on fulfilling the purposes of the Wilderness Act and compatibility with preserving wilderness character within the SBW.
2. Is an internal analysis.
3. Does not analyze or mitigate potential environmental impacts from commercial outfitting and guiding activities.
4. Does not determine, establish, allocate or authorize commercial outfitter and guide services.

Outfitter/guides can serve as important partners for the Forest Service. In particular, they can provide wilderness awareness and Leave No Trace education for visitors that may not be reached by other educational efforts. Outfitter/guides can also assist with monitoring activities, such as reporting invasive plants and illegal activities; these activities help the Forest Service achieve a higher level of wilderness stewardship.

Existing outfitter/ guide activities occurring in SBW are authorized under the Shoreline Outfitter/Guide Record of Decision and Final Environmental Impact Statement (USDA Forest Service 2004). This decision is currently under review.

South Baranof Wilderness

Area Description

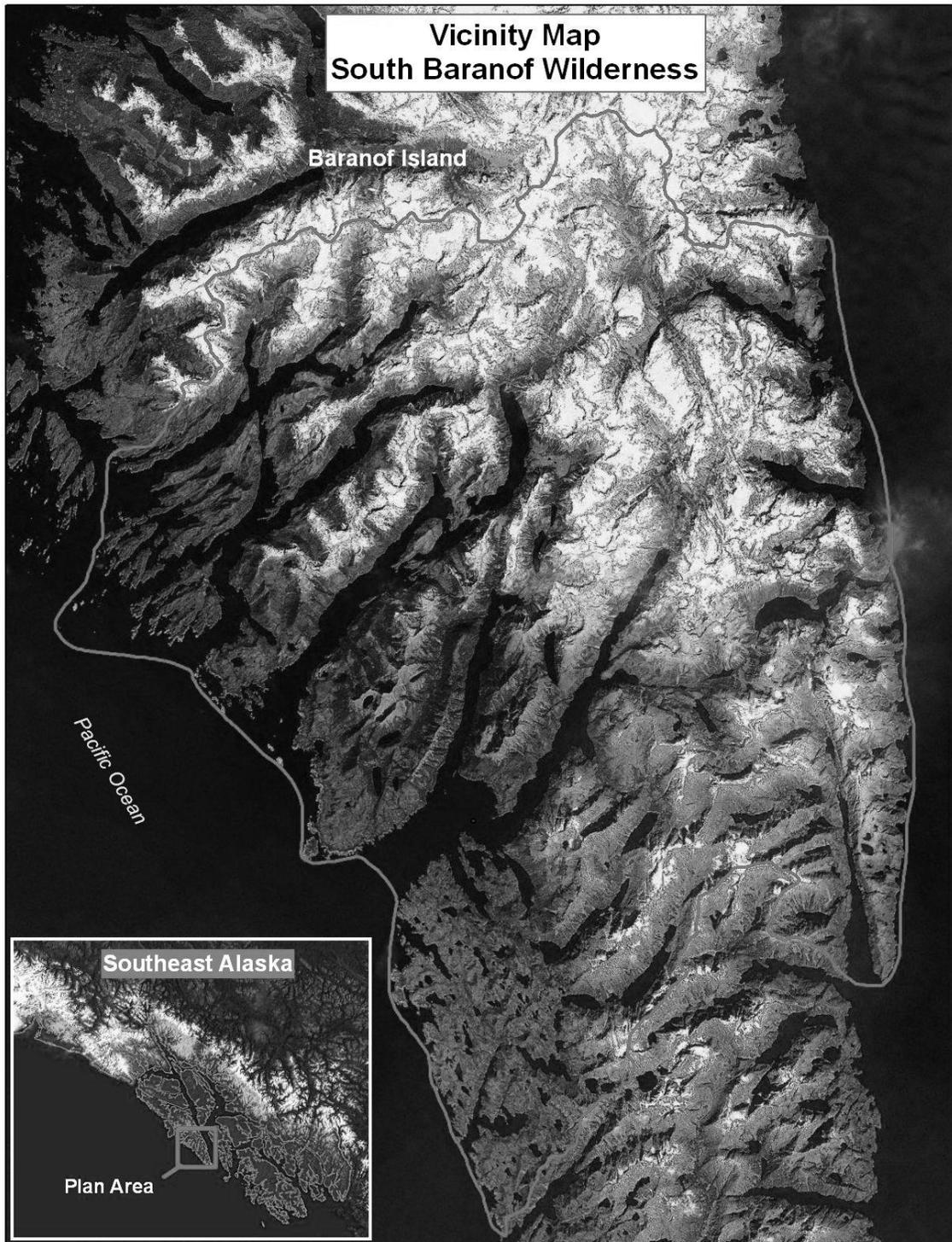
The South Baranof Wilderness (SBW; Figure 1) includes 319,568 acres of coastal temperate rainforest. Numerous bays along the area's rugged shoreline cut deep into the mountainous interior of Baranof Island, providing safe anchorage for boats in an otherwise exposed ocean environment. The community of Sitka lies approximately 19 miles to the north of the SBW and Port Alexander is approximately 20 miles to the south.

At 4,528 feet, Mount Ada is the highest peak in the SBW. On the eastern side of Baranof Island, Mount Ada's peak lies less than three miles from saltwater. Permanent snowfields and active glaciers blanket the higher elevations and several high-elevation lakes offer outstanding recreation opportunities. The SBW is part of the temperate rainforest that extends along the Pacific coastline from northern California to Cook Inlet, Alaska. Most of the area's lower-elevations offer old-growth western hemlock and Sitka spruce, with a scattering of yellow cedar and mountain hemlock.

SBW receives an average of 200 inches of precipitation per year with temperatures ranging from mid-20s to high 60s. Wildlife includes brown bears, Sitka black-tail deer, mountain goat, mink, marten, and river otters; trout and salmon (seasonally); as well as eagles and shorebirds. Seals, sea lions, whales, and a large population of sea otters are often seen offshore, and crab, shrimp, herring, salmon and halibut are harvested from the ocean.

The area supports a full range of life zones, from the marine to the alpine. It is this combination of rugged mountains, glaciers, dense rainforest, and the sea that gives the SBW its variety and high value as "wilderness."

Figure F5-1. South Baranof Wilderness vicinity map.



Access

Weather, marine conditions, and terrain make this remote area difficult to access. Much of the high mountains are permanently snow covered and the scenery is dramatic. Access to high-elevation lakes is difficult due to the steep terrain, particularly in the northern portion of the wilderness. Motorized boat, floatplane and kayak are the methods of access primarily used to visit the SBW. Most of the upland use in SBW is accessed by floatplane. Visitors can hire air taxi operators to provide transport services to lakes without a Forest Service special use permit. Upland areas are used for hunting, fishing, overnight use of public recreation cabins, and hiking. It is possible, though difficult, to access some of the lakes by foot from saltwater. There is also increasing interest in cross-island hiking trips and pack-rafting some of the interior lakes.

The long and narrow steep-sided bays on the west side provide a limited number of protected anchorages, resulting in a concentration of use at certain locations. The northwestern portion of the wilderness is comprised of large and small islands offering more protected passages for boaters, providing relatively easy access for the skilled skiff operator or kayaker due to proximity to Sitka. The east side provides several protected bays for taking a break from the open waters of Chatham Strait, and Red Bluff Bay is a common stopping point for those traveling inside waters around Admiralty Island.

There are concerns about the impacts of motorized transport, particularly floatplanes and motorized boats, in some areas of the SBW. The Alaska National Interest Lands Conservation Act of 1980 (ANILCA) allows for the use of motorized boats and planes to access SBW, but does not discuss their use for commercial outfitting and guiding purposes. Ultimately, the Forest Service must ensure that the area is administered for the use and enjoyment of the American people leaving it unimpaired for future use and enjoyment as wilderness while protecting the area and preserving its wilderness character (Wilderness Act, Section 2(a)).

Visitor Use

South Baranof Wilderness provides a diversity of recreation, subsistence, commercial and personal use opportunities. Most activities take place in, and depend on, settings that are primarily undeveloped. The entire area is wild and remote, with no road access available. Recreation facilities are limited, consisting of three public recreation cabins and one short system trail between Plotnikof Lake Cabin and the south end of Davidof Lake. Plotnikof Lake Cabin receives the most use of the three with an average of 15 nights annually (2009-2013). Avoss Lake Cabin receives 13 nights of use on average (2009-2013) followed by Davidof Lake Cabin with 6 nights (2009-2013).

Recreation activities cover a broad spectrum of uses, including sightseeing, wildlife viewing, fishing, hunting, kayaking, camping, and hiking. Some of the lakes support a good trout sport fishery and most streams and inlets support good salmon sport fishing. Port Banks, in particular, is known for a spring steelhead run, early summer coho run, and a fall run of coho making this a popular location throughout the fishing season. Politofski Lake Creek and Sandy Bay also support popular steelhead fisheries in the spring. However, most fishing in the area is commercial and occurs in the saltwater adjacent to the wilderness. Marine passages and bays are used for boating, crabbing, shrimping, and personal and commercial fishing.

Subsistence Use

On the eastern side of Baranof Island, the people of Kake and Angoon have traditional ties to this area and continue to depend on resources within the wilderness for a part of their livelihood. Sockeye salmon are harvested for subsistence purposes from Gut Bay and the Falls Lake system. The west side of the

wilderness is used by residents of Sitka and Port Alexander for sockeye salmon from the Benzeman Lake and Politofski Lake streams. Table 1 shows the subsistence fishing seasons for these areas:

Table F5-1. Subsistence Fishing Seasons.

Stream	Subsistence Fishing Season
Falls Lake	June 1 - August 15
Gut Bay	June 1 - July 20
Necker Bay	June 1 - August 31
Politofski	June 1 - July 31

Subsistence hunting and trapping occurs seasonally by the above mentioned communities. These activities are not intensive on the east side because of game animals and furbearers that are much closer to Kake and Port Alexander.

Historic Use

Unlike other parts of the Tongass National Forest, the area contained within the SBW boundary does not have an active mining history. There have been uses related to the early commercial fishing industry in the area. These include a cannery and herring reduction plant in Red Bluff Bay operating through the 1930's. Remains of this activity can be seen on the ground and draw some visitation to the site. Whale Bay area saw heavy commercial fishing use starting in the 1920s and a store was established during that timeframe in Port Banks. The old structure is still visible. In addition, historic cabin structures have been found in the Yamani Islets and on Lodge Island. The sites that still have evidence of past use have the potential to draw visitors interested in exploring historic ruins.

Commercial Outfitter/Guide Use

Thirty-five outfitter/guides were permitted and providing visitor services in SBW between 2008 and 2012; their activities provide services for forest visitors that are unfamiliar with southeast Alaska's wilderness. Authorized outfitted and guided activities include big game hunting for brown bear, mountain goat, and deer; remote setting nature tours (including hiking, beach use, and wildlife viewing), camping, and freshwater fishing. There was also a small amount of waterfowl and small game hunting that occurred in association with brown bear hunts.

Outfitter/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/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. Table 2 shows the type and amount of outfitter/guide use that occurred on SBW between 2008 and 2012.

Table F5-2. Outfitter and guide activities occurring in SBW, 2008-2012.

Activity	2008	2009	2010	2011	2012	Average Annual Use 2008-2012
Big Game Hunting – Brown Bear	53	88	105	107	46	80
Big Game Hunting – Deer	0	0	1	0	2	1
Big Game Hunting – Mountain Goat	59	17	46	0	4	25
Camping	35	84	44	132	54	70

Freshwater Fishing	251	293	244	206	225	244
Remote Setting Nature Tours (including hiking, wildlife viewing, photography, and beach use)	267	115	111	297	212	200
1 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.						

Freshwater fishing and remote setting nature tours (including hiking, wildlife viewing, photography, and beach use) are the most popular guided activities occurring in the SBW. Brown bear hunting, camping, and mountain goat hunting are also popular guided activities. The Forest Service has also received proposals for guided use at low-use public recreation cabins in SBW, but this use has not been authorized.

Nineteen guides provided freshwater fishing trips in the SBW between 2008 and 2012. Most freshwater fishing is accessed by motorized boat and occurs within a ½-mile distance of the shoreline, in the creeks and bays supporting anadromous fish populations. Gut Bay Creek, Politofski Lake Creek, Port Banks, Red Bluff Bay Creek, and Sandy Bay are the most popular guided fishing locations. Port Banks and Politofski Lake Creek support a steelhead run during April and May, which draws catch-and-release fly fishing operators. A small amount of fishing also occurs on Brentwood, Pass, Plotnikof, Politofski, Rezanof, and Upper Brentwood Lakes. One operator has been authorized to provide fly-in fishing trips in SBW. There have been several requests from guides for fly-in access for fishing and remote setting nature tours at lakes in the SBW, particularly lakes supporting steelhead populations.

Twenty-three guides provided guided remote setting nature tours (includes hiking, wildlife viewing, photography, and beach use) in SBW between 2008 and 2012. The most popular remote setting nature tour activity in SBW is hiking at Red Bluff Bay. Guides have reported using approximately 96 service days per year at Red Bluff Bay for remote setting nature tours activities. Other locations of interest include Gut and Patterson Bays.

Guided brown bear hunters typically access the SBW via motorized boat and camp onboard the boat during their hunt. In spring, they scan the shoreline beaches from their vessel before beginning their stalk. More use occurs in the uplands during the fall season when hunters often travel by foot along streams. Floatplane access for brown bear hunting at lakes in SBW has been authorized in the past, but all reported use (2008-2012) has occurred in coastal inlets and bays accessed from saltwater.

Guided mountain goat hunts also occur in SBW; popular locations include Crawfish, Hoggatt, and Red Bluff Bays. A small amount of guided mountain goat hunting has been reported in the uplands of Politofski Lake. The majority of goat hunts are boat-based, with occasional use of spike camps in the uplands. Floatplane access for guided mountain goat hunting at inland lakes has been authorized and reported in the past. Most hunts last approximately seven days and hunters may hike to the alpine once or twice during a hunt. Camps are typically occupied for a few nights each season. Non-guided hunters typically access high lakes in SBW for goat hunting in the early fall before guides begin conducting hunts, but there is some overlap in November. Access to herds is difficult and use tends to be concentrated at a few areas.

A small amount of guided deer hunting occurs in association with guided brown bear and mountain goat hunts; clients are given the option of including a deer hunt as part of a package, with the target species still being brown bear or mountain goat. In recent years, however, there has been an increased interest in guided deer-only hunting in SBW, with two guides currently authorized in SBW for deer-only hunts.

Three outfitter/guide companies have offered guided camping tours in SBW (2008-2012). Camping is usually offered as part of a multi-day, kayak- or motorized boat-based excursion and occurs along the shoreline of Baranof Island and the smaller, surrounding islands. Actual use locations include Patterson Bay, Rakof Islands, Lodge Island, Cedar Pass, West Crawfish Inlet, and Beauchamp Island. There have also been requests to utilize the existing public-use cabins for fly-in camping excursions at the lakes within SBW.

Determination of Need for Commercial Services - 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 SBW without an outfitter or guide because they lack the skills, knowledge, equipment, or ability to do so on their own, or they have safety concerns.
- There will be a continued demand for special use permits to conduct outfitter and guide operations in the SBW. Access points and use locations are generally 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). There may also be shifts in use patterns (timing and location) and user types (hikers, backpackers, campers, day users, etc.).
- Visitor conflicts have the potential to increase if overall use increases. Conflicts are already occurring in some areas on the district, particularly between guided bear hunters and visitors participating in other types of activities (e.g. freshwater fishing, remote setting nature tours). Guided and unguided groups tend to participate in similar activities at similar locations.

Evaluation Criteria

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

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

Wilderness Dependence

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” (USDA Forest Service 2008b, p.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. Wilderness dependence may also be considered for 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.

This needs assessment is one part of a sequential process of administering commercial recreation use on NFS lands within wilderness. Applications for outfitter and guide use in SBW must include adequate justification for why the proposed activity requires the use of wilderness.

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 specifies that “each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area” (Section 4(b)). The wilderness character of SBW is largely intact due to the area’s remoteness, challenging terrain, and limited means of access. There are, however, some areas where wilderness character is affected by recreational use. Section 2(c) of the Wilderness Act 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.
- The natural quality of wilderness character in SBW is largely unaffected by past and present human activity; however there are some noted instances of effect:
 - Three non-native plant species, covering less than 0.1 acres, have been documented.
 - Red squirrels, marten, beaver, and mountain goat have been introduced. Coho salmon were stocked in Banner and Blanchard Lakes in the 1980s.
 - In 1982, a permit was issued to the Tlingit and Haida Fisheries Development Corporation for the construction of a fish hatchery in Sandy Bay at the outlet of the Maksoutof River. The hatchery was constructed in 1982. Due to various problems which occurred during the hatchery's operation, the facility closed in 1985. In 1993, most of the remains of the hatchery were removed and the ground was recontoured to eliminate the man-made berms and rectangular race-way holes. Some materials still remain on site.
 - Forest Service employees have documented vegetation impacts (primarily tree cutting) at Port Banks and Sandy Bay.
- **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.
- The past and current presence of humans is evident in some parts of SBW. Existing developments include the Falls Lake fish weir and Patterson Bay net pen shoreties. The remains of past developments include the Sandy Bay hatchery as well as a cannery and herring reduction plant in Red Bluff Bay operating through the 1930’s. Whale Bay area saw heavy commercial fishing use starting in the 1920s and a store was established during that timeframe in Port Banks. The old structure is still visible. In addition, historic cabin structures have been found in the Yamani Islets and on Lodge Island.
- The Forest Service maintains three public recreation cabins in SBW, including the Avoss Lake, Davidof Lake, and Plotnikof Lake Cabins. Two additional cabins at Rezanof and Maksoutof Lakes exist, but are identified for decommission and removal. Impacts at cabins and dispersed

campsites include tree damage, litter, fire ring construction, and social trails. Outfitters and guides are required to practice Leave No Trace to minimize these impacts.

- In general, there is less evidence of human occupation or modification as one travels inland from the shoreline zone. Outfitter and guide activities that require the use of temporary or permanent structures, or create noticeable impacts on the ground, have the potential to further impact the undeveloped quality of wilderness character in SBW.
- **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.*
- Noise associated with motorized transport (e.g. motorized boats and float planes) has the potential to diminish wilderness character by reducing opportunities for solitude. Some parts of the wilderness lie on the path of weekly flights heading south from the community of Sitka as well as daily jet flights in the region, which affect noise levels in the southern portion of SBW, particularly during the summer months. While some motorized activities occur in the air and on the marine waters adjacent to SBW and are outside of Forest Service jurisdiction, other activities (e.g. floatplane landings on lakes and shoreline excursions associated with motorized transport) are within Forest Service jurisdiction and require a special use authorization.
- Red Bluff Bay is a popular location; social encounter monitoring during late June (2012 - 2013) and late July (2011-2013) indicates visitors can expect to encounter on average eight or more groups per day in the bay. The majority of this use is occurring on the adjacent saltwater. Land access that occurs is typically via motorized boat, with some access via kayak off nearby mother ships.
- Competition for use at lakes and streams occasionally occurs, particularly during the overlapping brown bear hunting season (April – May) and steelhead fishing seasons (April - June) at Port Banks, Politofski Lake Creek, and Sandy Bay, coho season (June – July and September-October) at Port Banks, sockeye season (June – August) at Gut Bay, Necker Bay, and Politofski Lake Creek, and early in the mountain goat hunting season (August-October).
- Opportunities for solitude are greater in the interior and northern portions of the SBW; upland areas receive fewer visitors due to the lack of facilities and difficult lake landings. The terrain is mountainous and generally without facilities or trails.
- **Other Features of Value.** *This quality pertains to distinct features fundamental to the wilderness character that are not contained within the other qualities.* This aspect is based on the last clause of Section 2(c) in the 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. The following unique qualities are associated with SBW:
 - **Red Bluffs** – Red Bluff Bay is one of the primary attractions in SBW due to the scenic mountain landscape surrounding the bay, waterfalls, brown bear viewing in the estuary, and the “red bluffs” rising above the entrance to the bay. The bluffs are a unique geologic feature of the area composed of serpentinites and serpentinitized periodotites.
 - **Glacial Features** - Unique to Baranof Island, among the hundreds of islands which make up the southeast Alaska panhandle, are it's active glaciers. Associated with these glaciers are narrow, sharp ridges between U-shaped glacial valleys and scenic fiords. Numerous rocky crests, sharp ridges, horns, aretes and cirques are found at higher elevations. Snow can be seen year round on higher summits with cirque glaciers and small permanent icefields, especially in the north half of the area.

- **Brown Bear** - Admiralty, Baranof, and Chichagof Islands together are considered unique due to the singular large predator (brown bear) dominating these landscapes.
- **Historic and Pre-Historic Values** - Since pre-historic times the lands within the SBW have supported a broad range of human use, development and occupancy. Thousands of years ago South Baranof became an area of seasonal habitation by local native peoples. Little is known about the prehistoric use of the present-day wilderness. There are a few documented prehistoric sites, but surveys have been very limited. Later, Russians and Americans arrived. Despite the continual presence by humans, the wilderness character of the area remained virtually uncompromised until the early 1900s when commercial fishing and whaling operations occurred and facilities in support of these activities were established (e.g., cannery, herring reduction plant). Since 1950, the facilities have been discontinued and many of the sites are being reclaimed by nature.
- **Subsistence Use** - Gathering wild food and other items has been an integral part of the way of life in southeast Alaska for thousands of years. The people of Kake and Angoon have traditional ties to this area and continue to depend on resources within the wilderness for a part of their livelihood. Sockeye Salmon are harvested for subsistence purposes from Gut Bay and the Falls Lake system. The west side of the wilderness is used by residents of Sitka and Port Alexander for taking sockeye salmon from the Benzeman Lake and Politofski Lake streams. Subsistence hunting and trapping occurs seasonally by the above mentioned communities. These activities are not intensive on the east side because of game animals and furbearers that are much closer to Kake and Port Alexander.

Knowledge, Skills, and Equipment Required

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, while still achieving a level of self-reliance and challenge 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, and the amount of use currently occurring. Market-generated demand for conducting outfitter and guide activities does not, by itself, constitute a need for commercial services. However, the determination of public need for a service is informed by examining current and past use trends.

Public Purposes / Management Objectives

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 also 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. Guides can serve as important partners for the Forest Service by providing wilderness awareness education and training in outdoor skills and ethics. Consideration will also be given to the compatibility of commercial use with use by the general public.

Determination of Need for Commercial Services by Activity

Activities Considered

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

- *Big Game Hunting for Brown Bear*
- *Big Game Hunting for Deer*
- *Big Game Hunting for Mountain Goat*
- *Camping (including overnight use of public recreation cabins)*
- *Floatplane Landing Tours*
- *Freshwater Fishing*
- *Remote Setting Nature Tours*

This assessment may be revised in the future as recreation use patterns change and demands for new outfitter/guide services are identified.

Big Game Hunting – Brown Bear

Brown bear hunting includes day use and overnight activities in the wilderness. Activities incidental to the primary brown bear hunt may involve camping, remote setting nature tour activities, freshwater fishing, or hunting for lower value game and waterfowl species.

Table F5-3. Brown Bear Hunting needs.

Evaluation Criteria	Evaluation of Need
Wilderness Dependence	Guide Use Areas (GUAs) 04-01 and 04-02 encompass the SBW. Both GUAs have large tracts of non-wilderness National Forest System (NFS) lands with suitable bear habitat. There is also some municipal land at Green Lake, and along the Green Lake Road, however these areas are characterized by a more urban setting. City land may also be available at Goddard Hot Springs, but this area receives a large amount of visitation and may not provide the visitor experience sought by guided bear hunters.
Wilderness Character	<u>Natural Quality</u> : The majority of guided hunting in SBW and surrounding areas on the Tongass National Forest is boat-based and results in minimal impacts to vegetation, soil, and water resources. Guided groups typically stay aboard a boat and hike up streams and very little use occurs in the uplands. 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.

	<p><u>Undeveloped Quality:</u> Guided hunting groups have the potential to impact the undeveloped quality of wilderness if tent platforms are constructed or remain in place when not in use.</p> <p><u>Outstanding Opportunities for Solitude or Primitive & Unconfined Recreation Quality:</u> Guided groups also have the potential to impact opportunities for solitude, particularly if access is by motorized boat or floatplane, and use occurs in popular areas. Conflicts have been reported between guided bear hunting groups and other permitted users, such as freshwater fishing and remote setting nature tour groups. Conflicts with unguided visitors are less common as brown bear hunting is not a popular unguided activity.</p> <p><u>Other Features of Value</u></p> <p>Brown Bear – ADF&G manages the brown bear population to ensure long-term sustainability of the resource.</p>
Skills, Equipment, and Knowledge Required	Visitors primarily access the SBW 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, particularly with brown bear, also pose a risk to safety. Guides know how to track and retrieve animals, carry radios and/or satellite phones for communication, and carry back-up rifles in case of emergency.
Outfitter and Guide Demand and Utilization	There is consistently high demand for guided brown bear services in SBW. An average of 80 service days was reported annually for this activity (2008-2012). Most authorizations are being fully utilized by existing guides. There are also several prospective applicants should more guided brown bear hunts become available. Most guides are booked years in advance for these hunts.
Public Purposes & Special Management Objectives	Guided brown bear hunting contribute to the recreational purpose of wilderness. Guides can also help the ADF&G male to female harvest ratio objectives and ensure that hunters care for and process carcasses in accordance with State law. Guide hunt records also help track harvest locations and success rates, contributing to better management of bear populations. Guides can also teach clients about low-impact skills.

Outfitter/guides provide access to brown bear hunting opportunities in SBW that would otherwise be unavailable to many members of the general public because of the high level of knowledge, skills, and equipment needed to safely conduct a remote hunt. Outfitters and guides also help the Forest Service meet special management objectives for dispersing impacts related to nonresident harvest. This activity contributes to the recreational purpose of wilderness and has little resource concerns. These factors, along with the State of Alaska’s requirement for non-resident hunters to be accompanied by a licensed guide, indicate there is a need for outfitter/guide brown bear hunting services in SBW. Guides can educate clients about low-impact skills to minimize impacts to the natural and undeveloped qualities of wilderness character.

Big Game Hunting – Deer

Deer hunting includes day use and overnight activities in the wilderness. Activities incidental to the primary deer hunt may involve camping, remote setting nature tour activities, freshwater fishing, or hunting for lower value game and waterfowl species.

Table F5-4. Deer Hunting needs.

Evaluation	Evaluation of Need
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Criteria	
Wilderness Dependence	<p>Guide Use Areas (GUAs) 04-01 and 04-02 encompass the SBW. Both GUAs have large tracts of non-wilderness National Forest System (NFS) lands with suitable deer habitat. A limited amount of private land (Shee Atika Incorporated) could be available in Katlian Bay. Permission would need to be secured. There is also some municipal land at Green Lake, and along the Green Lake Road, however these areas are characterized by a more urban setting. City land may also be available at Goddard Hot Springs, but this area receives a large amount of visitation and may not provide the visitor experience sought by guided deer hunters.</p>
Wilderness Character	<ul style="list-style-type: none"> • <u>Natural Quality</u>: The majority of guided hunting in SBW and surrounding areas on the Tongass National Forest is boat-based and results in minimal impacts to vegetation, soil, and water resources. The majority of deer hunts are boat-based, with occasional use of spike camps in the uplands. Camps are typically occupied for a few nights each season, but because they are located in alpine areas, impacts could become noticeable with a small amount of use. 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. • <u>Undeveloped Quality</u>: Guided hunting groups have the potential to impact the undeveloped quality of wilderness if tent platforms are constructed or remain in place when not in use. • <u>Outstanding Opportunities for Solitude or Primitive & Unconfined Recreation Quality</u>: Guided groups have the potential to impact opportunities for solitude, particularly if access is by motorized boat or floatplane, and use occurs in popular areas. Guided hunting groups typically consist of 2-4 hunters plus guides. Occasionally two groups will camp together and hunt different areas. Due to the nomadic approach taken for deer hunting, and the small size of groups involved, the potential for visitor conflicts is minimal. Currently, conflicts are uncommon with guided deer hunters and non-guided or subsistence hunters due to the limited amount of guided use that has occurred. • <u>Other Features of Value</u>: <ul style="list-style-type: none"> ○ Subsistence use has historically occurred in this wilderness area. If demand for guided deer hunting increases, consideration will need to be made for subsistence users.
Skills, Equipment, and Knowledge Required	<p>Visitors primarily access the SBW using motorized boats or float planes. Outfitters and guides can provide the skills, equipment, and knowledge required to safely access and enjoy the wilderness. A guide can ensure that State regulations and ethical hunting procedures are followed. Guides are also knowledgeable about deer behavior and where conflicts with unguided visitors may occur. There is no State requirement for a registered guide for deer hunting.</p>
Visitor Safety	<p>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, particularly with brown bear, also pose a risk to safety. There have been documented incidents of deer hunters being attacked by brown bear. Guides carry radios and/or satellite phones for communication and back-up rifles in case of emergency.</p>
Outfitter and Guide Demand and Utilization	<p>Between 2008 and 2012, there was a low level of demand for guided deer hunting. Most guided deer hunting occurs as incidental take to a bear or goat hunt, or as part of combination hunt for bear and deer. Five permits have been issued authorizing 38 deer hunts; only two of these were exclusively for deer hunting. None of these permits has been fully utilized. Recently, there has been an increased demand for adding deer hunts to existing big game hunting permits.</p>

Public Purposes & Special Management Objectives	Guided deer hunting contributes to the recreational purpose of wilderness. Guide hunt records help track harvest locations and success rates, contributing to better management of deer populations. Guides can also teach clients about low-impact camping and hiking skills.
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Outfitter/guides provide access to deer hunting opportunities in SBW that would otherwise be unavailable to many members of the general public because of the high level of knowledge, skills, and equipment needed to safely conduct a remote hunt. Outfitters and guides also help the Forest Service meet special management objectives for dispersing impacts related to nonresident harvest. This activity contributes to the recreational purpose of wilderness and results in limited impacts to Forest resources, including wilderness character. These factors indicate there is a need for outfitter/guide deer hunting services in SBW. Guides can educate clients about low-impact camping and hiking skills to minimize impacts to the natural and undeveloped qualities of wilderness character.

Big Game Hunting – Mountain Goat

Mountain goat hunting includes day use and overnight activities in the wilderness. Activities incidental to the primary goat hunt may involve camping, remote setting nature tour activities, freshwater fishing, or hunting for lower value game and waterfowl species.

Table F5-5. Mountain Goat Hunting needs.

Evaluation Criteria	Evaluation of Need
Wilderness Dependence	The majority of accessible goat herds on National Forest System (NFS) lands within the Sitka Ranger District occur outside of wilderness, particularly in the area north of Sitka. These non-wilderness NFS lands are also more heavily used by local residents. With the exception of Katlian Valley and Medvejie, there are no private lands in the vicinity of SBW where goats occur during the hunting season.
Wilderness Character	<ul style="list-style-type: none"> • <u>Natural Quality</u>: 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. The majority of goat hunts are boat-based, with occasional use of spike camps in the uplands. Hunts generally last approximately seven days and hunters may hike to the alpine once or twice during a hunt. Camps are typically occupied for a few nights each season, but because they are located in alpine areas, impacts could become noticeable with a small amount of use. • <u>Undeveloped Quality</u>: Guided hunting groups have the potential to impact the undeveloped quality of wilderness if tent platforms are constructed or remain in place when not in use. • <u>Outstanding Opportunities for Solitude or Primitive & Unconfined Recreation Quality</u>: Guided groups have the potential to impact opportunities for solitude, particularly if access is by motorized boat or floatplane, and use occurs in popular areas. Guided goat-hunting groups typically consist of one hunter and one or two guides. Occasionally two groups will camp together and hunt different areas. Due to the nomadic approach taken for goat hunting, and the small size of groups involved, the potential for visitor conflicts is minimal. Local hunters typically access high lakes in SBW for goat hunting in the early fall before guides begin conducting hunts, but there is some overlap in November. Access to herds is difficult and use tends to be concentrated at a few areas. Potential for conflicts exist at Lake Diana and Crawfish Inlet where both guided and unguided groups hunt. This has become more of an issue in recent years as hunting seasons have closed early due to more restrictive nanny harvest. Goat hunting guides have shifted their use patterns to earlier in the

	season in order to be more assured of the opportunity to hunt with their clients.
Skills, Equipment, and Knowledge Required	Visitors primarily access the SBW 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 goat hunters to be accompanied by a registered guide or a relative within the second degree of kin. Goat hunting in Southeast Alaska is substantially different than hunting in other states. Hunters need to be skilled in identifying and stalking goats in a dynamic and challenging environment. It is also important that they understand how to identify males and females and are familiar with Guide Use Area boundaries identified by the State. A guide can ensure that State regulations and ethical hunting procedures are followed.
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, particularly with brown bear, also pose a risk to safety. Guides know how to track and retrieve animals, carry radios and/or satellite phones for communication, and carry back-up rifles in case of emergency. Mountain goat hunting is one of the most dangerous guided activities offered in Alaska. Hunts are typically carried out in very hazardous terrain where the risk of injury from slips, trips, and falls is substantial.
Outfitter and Guide Demand and Utilization	There are more requests for guided mountain goat hunting in SBW than can be accommodated. ADF&G has population concerns and authorized hunts have been kept at a low number. An average of 25 service days was reported annually for this activity (2008-2012). Existing authorizations are being fully utilized by guides. Most guides are booked years in advance for these hunts.
Public Purposes & Special Management Objectives	Guided mountain goat hunting contributes to the recreational purpose of wilderness, although only a small segment of the population is willing or physically able to participate in this activity. Guides can help the ADF&G male to female harvest ratio objectives and ensure that hunters care for and process carcasses in accordance with State law. Guide hunt records also help track harvest locations and success rates, contributing to better management of goat populations. Guides can also teach clients about low-impact camping and hiking skills.

Outfitter/guides provide access to mountain goat hunting opportunities in SBW that would otherwise be unavailable to those members of the general public interested in this activity because of the high level of knowledge, skills, and equipment needed to safely conduct a remote hunt. Outfitters and guides also help the Forest Service meet special management objectives for dispersing impacts related to nonresident harvest. Guides can help identify gender correctly, thereby limiting female harvest, which has been deemed critical by ADF&G for maintaining goat populations. This activity contributes to the recreational purpose of wilderness and has few resource concerns. These factors, along with the State of Alaska's requirement for non-resident hunters to be accompanied by a licensed guide, indicate there is a need for outfitter/guide mountain goat hunting services in SBW. Guides can educate clients about low-impact camping and hiking skills to minimize impacts to the natural and undeveloped qualities of wilderness character.

Camping (including overnight use of public recreation cabins)

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.

Table F5-6. Camping needs.

Evaluation Criteria	Evaluation of Need
Wilderness Dependence	Opportunities for guided camping exist in the non-wilderness portion of the Sitka Ranger District and surrounding areas of the Tongass National Forest. Wilderness, however, provides the remote wild land setting desired for this type of activity. Wilderness also provides an opportunity for guided visitors to practice Leave No Trace camping skills and learn about outdoor ethics. On non-wilderness NFS lands surrounding the SBW, there are relatively few high-elevation lakes available for camping and no high elevation public recreation cabins. There are several cabins on low-elevation lakes available outside of wilderness, including Baranof Lake, Sitkoh Lake, Kook Lake, and Lake Eva cabins.
Wilderness Character	<p><u>Natural Quality:</u> Guided camping generally occurs on the beaches along the shoreline of SBW and results in minimal impacts to vegetation, soil, and water resources. There are some locations where impacts to vegetation and soil are noticeable. Guided camping may increase the size of existing campsite boundaries. Firewood collection for campfires could occur, resulting in “human browse lines” or stumps. Stipulations for waste disposal and use of fire pans would have to be added to permits to ensure degradation of areas did not occur.</p> <p><u>Outstanding Opportunities for Solitude or Primitive & Unconfined Recreation Quality:</u> There is also 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 (e.g., Red Bluff Bay). Many of the lakes in SBW are small and can only accommodate one group for camping. Along the adjacent waterways, motorized boat traffic has the potential to diminish opportunities for solitude. Use of public recreation cabins in SBW at Avoss, Davidof, and Plotnikof Lakes is low (on average 6-15 nights reserved per year), so competition is low.</p>
Skills, Equipment, and Knowledge Required	Camping visitors primarily access the SBW using kayaks, motorized boats or float planes, including charter services. Outfitters may also provide camping equipment that visitors do not have. Outfitters and guides can provide the skills, equipment, and knowledge required to safely access and enjoy the wilderness. Many wilderness cabins are located in remote, steep basins and are not accessible by trail. Visitors may have limited experience in this type of terrain and weather conditions. Guides also provide the skills, equipment, and knowledge needed to minimize impacts from overnight visitors. Camping (including stays at remote wilderness public use cabins) involves skills that embrace traditional techniques and include elements of risk and challenge, especially for those new to the activity. It encourages self-reliance and helps strengthen independent decision-making.
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. Outfitters and guides may provide communication with rescue services in the event of an emergency.
Outfitter and Guide Demand and Utilization	There is demand for guided camping services in the SBW. An average of 70 service days annually was reported for this guided activity (2008-2012). The beaches and high-elevation lakes in this wilderness provide desirable recreation settings for this type of activity. There have been no commercial use requests for fly-in, non-hunting related camping, with the exception of cabin camping, at any lakes in SBW. No permits have been issued for guided camping at public recreation cabins although interest has been expressed for this type of use.
Public Purposes & Special Management Objectives	Guided camping tours provide an opportunity for the visiting public to safely access and enjoy the SBW for recreational pursuits. Multiple day experiences allow visitors to forge deep connections with nature. 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. Forest Plan direction for public use cabins located in

	wilderness is to maintain them at present or improved condition. However, high costs of maintenance for low-use cabins are becoming prohibitive. An opportunity exists for partnerships with guides to perform deferred maintenance on low-use cabins or provide firewood. Guides who pursue this activity could educate visitors on the use of primitive tools as well as the enabling legislation, which allows for these structures in wilderness.
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In summary, guided camping generally occurs on the beaches and along the shoreline of SBW and results in minimal impacts to vegetation, soil, and water resources. Wilderness provides an opportunity for guided visitors to practice traditional skills, learn about outdoor ethics, and forge deep connections with nature. Backcountry camping experiences depend on a wild land setting and are consistent with management of the area as wilderness. 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 outfitter/guide camping services in SBW.

There is a potential for guided groups to impact opportunities for solitude in the wilderness, particularly if the groups are large, use is authorized in popular locations (e.g., Red Bluff Bay), and access is via motorized transport. Group size will be limited to twelve in non-cabin locations and six to eight persons at cabins (depending on cabin capacity). Permit stipulations will be designed to reduce potential conflicts with unguided visitors. Preference will be given to operators that access the wilderness using non-motorized transport, that promote Leave No Trace and outdoor ethics, and educate their clients about wilderness values.

Floatplane Landing Tours

A floatplane landing tour is defined 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. Visitors typically spend little time on land at each stop. Floatplane landing tours do not include authorized point-to-point floatplane transport used as an ancillary service to another commercial service for activities such as remote setting nature tours, hunting, fishing, or camping (including public use cabins).

Table F5-7. Floatplane Landing needs.

Evaluation Criteria	Evaluation of Need
Wilderness Dependence	Floatplanes are a common and allowed method of transport for recreation use on the Tongass National Forest. However, the authorization of floatplane landing tours on the Tongass National Forest is limited and has not been authorized within the SBW. Misty Fiords National Monument provides a high number of service days for operators with lake landings. There are also several air taxi companies who provide this service without lake landings. In addition, several lakes exist outside of wilderness that offer sightseeing in a lake environment.
Wilderness Character	<u>Natural Quality</u> : Visitors typically step off the plane and explore the nearby area on foot, spending a short amount of time in the wilderness before re-boarding the plane. As a result, these activities typically result in minimal impacts to vegetation, soil, and water resources; however the potential for vegetative damage and soil erosion exists. Potential resource concerns include repeated use on unprotected native tread (e.g., muskeg and forested wetlands), user-created trails and trail marking (e.g. flagging and rock cairns), particularly in areas with interesting features and recreation attractions. <u>Undeveloped Quality</u> : This activity is entirely dependent on the use of floatplanes. ANILCA Special Access provisions (Section 1110(a)) specifically allow for the continued use of airplanes for traditional activities and travel to and from villages and homesites. Recreation activities, such as sightseeing, are considered “traditional” as defined in Forest Service Manual 2326.1(6) (USDA Forest Service 2008a). As such, the presence of floatplanes in SBW is an accepted method of access and does not constitute a

	<p>degradation of the undeveloped quality of wilderness character.</p> <p><u>Outstanding Opportunities for Solitude or Primitive & Unconfined Recreation Quality:</u> The frequency and duration of floatplane use can affect outstanding opportunities for solitude or primitive and unconfined recreation. Repeated landings at locations within wilderness by floatplane landing tour activities are not compatible with preserving these outstanding opportunities. The higher incidence of floatplane flights and landings that are associated with floatplane landing tours degrades the opportunities for those visitors seeking to experience the natural sounds of the wilderness and primitive recreation.</p>
Skills, Equipment, and Knowledge Required	<p>Floatplane landing tours typically do not require a high degree of specialized skill, equipment or challenge for the forest visitor. Visitors typically step off the plane and explore the nearby area on foot, spending a short amount of time in the wilderness before re-boarding the plane. However, this activity does require an aircraft and pilot with experience in the challenging flying conditions of southeast Alaska. The average person would not have this equipment or skill and commercial services are typically needed for this activity.</p>
Visitor Safety	<p>Any activity that exposes people to southeast Alaska’s wind, rain, and cold weather conditions poses a threat to visitor safety if visitors are unprepared. Wildlife encounters may also pose a risk to safety. Hazards that people could encounter include brown bears, sudden weather changes, uneven terrain, falls and hypothermia. Since the time spent out of the plane is relatively brief and groups typically stay close to the landing site, risk of hypothermia and exposure to the elements is low.</p>
Outfitter and Guide Demand and Utilization	<p>No outfitter/guides have been authorized for floatplane landing tours in SBW. There have been commercial use requests for this activity.</p>
Public Purposes & Special Management Objectives	<p>This activity predominantly involves viewing natural features from the air and landing for only short periods of time within the wilderness. 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. Although floatplanes are an accepted method of access in SBW, the activity itself does not fulfill the purposes of wilderness that strives for invoking opportunities for spirituality and/or allow for deep connections with nature.</p>

In summary, floatplane landing tours do not offer opportunities for self-reliance and challenge to the wilderness visitor. This activity is entirely dependent on the use of aircraft to view the wilderness from the air with short periods of time on the ground. Although the method of access is allowed, the activity itself degrades outstanding opportunities for solitude or primitive types of recreation, and does not provide visitors the opportunity for developing deep connections with nature. There is not a need for outfitter/guide floatplane landing tour services in SBW.

Freshwater Fishing

Freshwater fishing includes both catch-and-take and catch-and-release methods under Alaska sport fishing regulations (excludes commercial and subsistence fishing). This use depends on places and times where anadromous and resident fish are located.

Table F5-8. Freshwater Fishing needs.

Evaluation Criteria	Evaluation of Need
Wilderness Dependence	<p>Several streams on non-wilderness NFS lands on the Sitka Ranger District and surrounding areas of the Tongass National Forest support anadromous fish populations and provide excellent freshwater fishing opportunities, including the Nakwasina, Salmon Lake, Lake Eva, Deer Lake, and Sashin Lake river systems. Opportunities for fishing on non-NFS lands are limited, but include Katlian Bay (Shee Atika Incorporated) and possibly State park areas. In addition to the lakes</p>

	mentioned previously, there are a limited number of nearby high-elevation lakes outside of the wilderness. Catch & release steelhead fishing is a guided activity that is desired throughout southeast Alaska and there are a limited number of primary steelhead streams available, three of which are in SBW (Politofski Lake Creek, Port Banks, and Sandy Bay Creek).
Wilderness Character	<p><u>Natural Quality:</u> Guided freshwater fishing is accessed via motorized boat or plane and results in minimal impacts to vegetation, soil, and water resources. Current resource concerns at streams include litter, development of “fishing paths,” and wildlife displacement. ADF&G provides sport fishing guidelines that help maintain the natural quality of wilderness character through the sustainable management of fish populations.</p> <p><u>Outstanding Opportunities for Solitude or Primitive & Unconfined Recreation Quality:</u> Guided groups have the potential to impact opportunities for solitude, particularly if the groups are large and use is authorized in popular locations (e.g., Port Banks, Sandy Bay, Red Bluff Bay), or access is via motorized boat or floatplane. There is also potential for conflicts during spring and fall bear hunting seasons and subsistence fish harvest seasons (Table 1). Many of the lakes in SBW are small and can only accommodate one or two groups for fishing. Visitor conflicts may occur, particularly during steelhead, coho, and sockeye fishing seasons.</p> <p><u>Other Features of Value:</u> Subsistence use has historically occurred in this wilderness area. Consideration will need to be made for subsistence users. Brown Bear - There have been some reports of possible habituation of bears in site-specific areas on the Sitka district (e.g. Port Banks, Red Bluff Bay).</p>
Skills, Equipment, and Knowledge Required	Visitors primarily access the SBW 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. Navigating and route-finding in steep, brushy terrain may also be beyond the skill level of many visitors. Outfitter/guides can impart knowledge of catch and release techniques, where and when the fish runs are occurring, fish identification, and proper disposal methods.
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.
Outfitter and Guide Demand and Utilization	There are numerous streams and low- and high- elevation lakes in SBW that support anadromous fishing populations. Between 2008 and 2012, 19 guides were authorized to provide guided freshwater fishing services in SBW and an average of 244 service days were reported annually. The current level of use for fishing is low to high depending on the area and species. There is potential for conflicts as well, especially in fall and spring during guided bear hunts and during times of subsistence fish harvest (Falls Lake: June 1 – August 15; Gut Bay: July1 – July20; Necker: June 1 – August 31; Politofski: June 1 – July 31).
Public Purposes & Special Management Objectives	Guided freshwater fishing contributes to the recreational purpose of wilderness. Outfitter/guides promote proper catch and release techniques and an understanding of population dynamics in isolated streams and lakes. Outfitter/guides are required to turn in freshwater fishing logs to ADF&G; the results of these can be used to determine non-resident fishing harvest.

In summary, there are several streams and lakes in the SBW that provide outstanding remote freshwater fishing opportunities. Fishing is an appropriate use of wilderness and outfitter/guides contribute to the recreational purpose of wilderness. Guides can assist visitors by navigating and route-finding in steep, brushy terrain and teach low-impact practices. Guides also impart knowledge of catch and release techniques, where the runs are occurring, fish identification and proper disposal methods. There is a need for outfitter/guide freshwater fishing services in SBW. Preference will be given to outfitter/guides that

promote Leave No Trace and outdoor ethics and educate their clients about wilderness values. In addition, consideration will need to be made for subsistence users.

Remote Setting Nature Tours

Remote setting nature tours encompass, but are not limited to, a wide variety of day use activities such as hiking, paddling, wildlife viewing, photography, exploring, sightseeing, and cultural tours. Visitors may spend 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.

Table F5-9. Remote Setting Nature Tour needs.

Evaluation Criteria	Evaluation of Need
Wilderness Dependence	<p>There are opportunities for guided remote setting nature tours (RSNT) on non-wilderness NFS lands on the Sitka Ranger District and surrounding areas of the Tongass National Forest. For example, lakes to the north and south of the wilderness can provide sightseeing and hiking opportunities at a lake environment. There are also outstanding hiking opportunities at Lake Eva, Kruzof Island, and Mist Cove. Guides currently offer tours in all of these areas. RSNT opportunities are limited on non-NFS lands; some opportunities exist at Katlian Bay (Shee Atika Incorporated), nearby State parks including an outstanding trail to Sea Lion Cove. Guides currently offer hikes in some of these non-NFS locations.</p> <p>However, wilderness provides the remote, wild land setting often desired for these activities. SBW in particular provides visitors the opportunity to learn about and experience the glacial features, geological features at Red Bluff Bay, brown bear, cultural history features, and rural Alaskan lifestyle that are unique to this wilderness.</p>
Wilderness Character	<ul style="list-style-type: none"> • Natural Quality: RSNTs occurring in the SBW are primarily boat-based and use is generally concentrated on beaches and along established trails. It is rare that most visitors participating in RSNT travel more than one-half mile from shorelines unless there is an established trail. As a result, these activities typically result in minimal impacts to vegetation, soil, and water resources. However, potential resource concerns include repeated use on unprotected native tread (e.g., muskeg and forested wetlands), user-created trails and trail marking (e.g. flagging and rock cairns), particularly in areas with interesting features and recreation attractions. The potential for vegetative damage and soil erosion exists. • Outstanding Opportunities for Solitude or Primitive & Unconfined Recreation Quality: There is also a potential for outfitted/guided groups to impact opportunities for solitude in the wilderness, particularly if the groups are large, use is authorized in popular locations, or access is by motorized boat or float plane. Impacts to opportunities for solitude and primitive and unconfined recreation will be most noticeable in areas where visual screening from vegetation and topography is low. • Other Features of Value: <ul style="list-style-type: none"> ○ Brown Bear - There have been some reports of possible habituation of bears in site-specific areas on the Sitka district (e.g. Port Banks, Red Bluff Bay).
Skills, Equipment, and Knowledge Required	<p>Visitors primarily access the SBW using kayaks, motorized boats or float planes. Outfitters and guides can provide the skills, equipment, and knowledge required to safely access and enjoy the wilderness. Equipment for day hiking (e.g. rain gear, footwear, warm clothing) can be obtained at relatively inexpensive prices at stores nationwide. Air taxi services can drop off and pick up visitors at locations of their choice, but without local knowledge of the landscape, it may be difficult for a visitor to</p>

	identify suitable locations for this activity. Outfitters/ guides can provide the skills, equipment, and knowledge required to safely access the wilderness.
Visitor Safety	While hiking and beach walking are simple skills, 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 if visitors are unprepared. Wildlife encounters may also pose a risk to safety. Hazards that people could encounter include brown bears, sudden weather changes, steep terrain, falls and hypothermia. Risk to safety and the physical and emotional challenges of surviving in this environment are high.
Outfitter and Guide Demand and Utilization	Twenty-three outfitter/guides were authorized to provide RSNTs in SBW between 2008 and 2012. The most popular guided RSNT activity is hiking at Red Bluff Bay. Other consistently used locations include Gut Bay, Patterson Bay, Sandy Bay, and Port Banks. Most RSNT use occurs in the shoreline zone surrounding protected bays and beaches. Use of the uplands is low, but operators have expressed an interest in providing hiking tours in the upland portion of the wilderness from saltwater, as well as floatplane access to lakes.
Public Purposes & Special Management Objectives	Guided RSNTs provide an opportunity for the visiting public to safely access and enjoy SBW for recreational pursuits. Outfitters/guides providing RSNTs emphasize Leave No Trace skills and outdoor ethics. RSNTs depend on a wild land setting and are consistent with management of the area as wilderness. Guides authorized to operate in wilderness are required to educate clients about Leave No Trace outdoor ethics. For example, a guide could encourage clients to spread out in alpine and muskeg areas rather than walk single file. Additionally, an opportunity exists for partnerships with guides to perform deferred maintenance on low-use wilderness trails that are becoming cost-prohibitive to maintain.

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, use is authorized in popular locations (e.g., Red Bluff Bay), and access is via motorized boat or float plane. Guides can assist visitors by navigating and route-finding in steep, brushy terrain and teach low-impact practices. Outfitter/guides provide visitors with the skills, equipment, and knowledge required to safely access and enjoy the wilderness while still achieving a high level of self-reliance and challenge in the activity. There is a need for outfitter/guide remote setting nature tour services in SBW. Preference will be given to outfitter/guides that promote Leave No Trace and outdoor ethics, educate their clients about wilderness values, use smaller group sizes, and use non-motorized transport. Permit stipulations will be designed to reduce potential conflicts with unguided visitors as well as minimize impacts to soils and vegetation.

Citations

ANILCA, 1980. Alaska National Interest Lands Conservation Act, Public Law 96-487, 96th Congress.

USDA Forest Service, 2008a. Forest Service Manual, Alaska Region (Region 10), FSM 2300 – recreation, wilderness and related resource management, chapter 2320 – wilderness management. November 14, 2008.

USDA Forest Service, 2008b. Tongass National Forest Land Resource and Management Plan. January 2008. R10-MB-603b.

USDA Forest Service, 2007. Determination of Need and Extent of Commercial Uses within Wilderness Areas on the Tongass National Forest.

USDA Forest Service, 2004. Shoreline Outfitter/Guide Record of Decision and Final Environmental Impact Statement. December 2004. R10-MB-519a.

Wilderness Act, 1964. Public Law 88-577. 19 U.S. C. 1131-1136. 88th Congress.

Appendix A. 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)

In 1990, the Tongass Timber Reform Act (TTRA) amended ANILCA and designated two new wilderness areas. Section 707 of ANILCA specifies that, “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 that apply to this assessment include:

- (1) Section 811 – Reasonable access for subsistence resource uses.
- (2) 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.
- (3) 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.
- (4) Section 1307(b) – Provides a preference for providing visitor services (except for fishing and hunting) within conservation system units to Native Corporations and local residents.
- (5) Section 1315(c) – Allows for the permitting, maintenance, replacement, and continued use of public use cabins.
- (6) 1315(d) allows for the construction of new cabins if they are necessary for the protection of public health and safety.
- (7) 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.

- (8) 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.”

Forest Service Manual and Handbook 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:

- (1) 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;
- (2) Administer special uses based on resource management objectives and sound business management principles;
- (3) Develop and maintain a well-trained workforce to properly manage and administer special uses; and
- (4) Facilitate the delivery of recreational opportunities on National Forest System lands for services not provided by the Forest Service.

(5) Forest Service Special Uses objectives specifically for outfitting and guiding, provided in FSH 2709.14, Chapter 50, Section 53.1b states:

1. 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.
2. Facilitate greater participation in the outfitting and guiding program by organizations and businesses that work with youth and educational groups.
3. 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 Uses policy for outfitting and guiding provided in FSH 2709.14, Chapter 50, Section 53.1c states:

1. 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.
2. 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.
3. 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).
4. 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:

1. 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.
2. Provide outstanding opportunities for solitude or a primitive and unconfined type of recreation.

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

1. 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.

2. Use information, interpretation, and education as the primary tools for management of wilderness visitors.
3. Manage for recreation activities that are dependent on the wilderness environment so that a minimum of adaptations within wilderness are necessary to accommodate recreation.
4. 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.

Tongass National Forest Land and Resource Management 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.”

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