

Wilderness Stewardship Plan: Extent Necessary Determination For Commercial Services in Wilderness

National Park Service
U.S. Department of the Interior

Sequoia and Kings Canyon National Parks
California



Commercial services aid many people in experiencing wilderness on public lands in a variety of appropriate ways. Without such services, many could not “realize” the purposes of wilderness described in the Wilderness Act. The *Special Provisions* section of the Act, §4(d)(5), says that “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” [italics added]. The “purposes” referred to are those listed in §4(b): “...wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.” In order to meet the mandate of the Act, agencies that manage wilderness areas must determine what activities are “proper” and to what extent (i.e., the amount) these activities are necessary and will be allowed.

These parks conducted a comparative and qualitative analysis to make this specialized determination, known as an “Extent Necessary Determination” (END). The purposes of the determination, and the limitations it sets forth, are to ensure that commercial services support only appropriate visitor activities that achieve desired conditions and objectives, and preserve wilderness character while allowing the realization of wilderness purposes, i.e., public use and enjoyment of wilderness. This END was developed as an extension of the establishment of wilderness visitor capacity (appendix A).

Desired Condition for Commercial Services – Commercial services may be performed to the extent necessary for activities that are proper for realizing the recreational or other wilderness purposes of the area and in a manner that ensures the preservation of wilderness character. Commercial services would support visitor use and enjoyment of wilderness in a variety of appropriate ways.

Why is the NPS evaluating commercial services in wilderness?

The parks are setting a limit on the types and amounts of support that commercial service providers offer visitors in the parks’ wilderness in order to comply with the 1964 Wilderness Act, the 2012 Sequoia and Kings Canyon Backcountry Access Act, and National Park Service (NPS) policy. The purpose of setting a limit on commercial services is to ensure that wilderness character is preserved and that the resources and public purposes of these federally protected areas are not degraded or dominated by private, commercial entities. Commercial services, as established in the Wilderness Act, are discretionary and *may* only be allowed to levels that are determined necessary for wilderness purposes.

Status Quo (Alternative 1)

A variety of commercial services are currently offered by multiple providers on NPS-managed lands. These include: guided hiking and backpacking; guided stock trips; equipment and supplies transport (by stock); guided mountaineering and climbing; and guided cross-country skiing. Commercial service providers support approximately 7-8% of the annual 111,000 visitor use days in the parks’ wilderness.

- Services provided by **non-stock-based** providers support approximately 5,000 visitor use days
- Services provided by **stock-based** providers support approximately 3,400 visitor use days

(Note: One visitor use day is equal to one commercial service day. A commercial service day (CSD) is one visitor spending part or all of a day in the parks as a client of a commercial service provider.)

Commercial service providers must be authorized, through a formal permitting process, to conduct business in the parks and must comply with all existing restrictions, including: permit entry quotas, party-size limits, camping limits, grazing limits, and campfire restrictions. Commercial service providers are also subject to additional specific limits and requirements as conditions of their operating permits (called Commercial Use Authorizations or CUAs).

Alternatives – Extent Necessary Allocations for Commercial Services

Alternative 2 (NPS Preferred): Emphasize Site-Specific Actions to Protect Wilderness	Alternative 3: Emphasize Opportunities for Primitive Recreation	Alternative 4: Emphasize Undeveloped and Noncommercial Recreation	Alternative 5: Emphasize Opportunities for Solitude
Total CSDs* for all wilderness services: 8,400	Total CSDs* for all wilderness services: 10,920	Total CSDs* for all wilderness services: 4,390	Total CSDs* for all wilderness services: 5,880
Total CSDs for all non-stock-based wilderness services: 5,040	Total CSDs for all non-stock-based wilderness services: 6,550	Total CSDs for all non-stock-based wilderness services: 2,630	Total CSDs for all non-stock-based wilderness services: 3,530
CSDs from the above total for non-stock-based services that can be used in the <i>Mount Whitney Management Area</i> from late May to late September: 930	CSDs from the above total for non-stock-based services that can be used in the <i>Mount Whitney Management Area</i> from late May to late September: 1,210	CSDs from the above total for non-stock-based services that can be used in the <i>Mount Whitney Management Area</i> from late May to late September: 490	CSDs from the above total for non-stock-based services that can be used in the <i>Mount Whitney Management Area</i> from late May to late September: 650
Total CSDs for all stock-based wilderness services: 3,360	Total CSDs for all stock-based wilderness services: 4,370	Total CSDs for all stock-based wilderness services: 1,760	Total CSDs for all stock-based wilderness services: 2,350
CSDs from the above total for stock-based services that can be used in the <i>Mount Whitney Management Area</i> from late May to late September: 550	CSDs from the above total for stock-based services that can be used in the <i>Mount Whitney Management Area</i> from late May to late September: 715	CSDs from the above total for stock-based services that can be used in the <i>Mount Whitney Management Area</i> from late May to late September: 290	CSDs from the above total for stock-based services that can be used in the <i>Mount Whitney Management Area</i> from late May to late September: 385

* CSD: Commercial Service Day – one visitor spending part or all of a day in the parks as a client of a commercial service provider

Where can I find more information?

The Extent Necessary Determination and the proposed changes to commercial services in park wilderness are addressed as Element 11 in each alternative and in detail in appendix B of the Wilderness Stewardship Plan / Draft Environmental Impact Statement. For background information on commercial services, see Chapter 3: Affected Environment in the *Visitor Use* and *Commercial Services* sections. The effects from implementing limits are described in Chapter 4: Environmental Consequences, in the *Wilderness Character* and *Visitor Use* sections.

*... to secure for the American people of present and future generations
the benefits of an enduring resource of wilderness.*

