

Pack and Saddle Stock Outfitter-Guide Special Use Permit Issuance Draft Environmental Impact Statement Summary, August 2010

Introduction

Pack and saddle stock outfitters have been operating throughout the analysis area for the past 20 to 50 years. Some operated under 5-year term permits, while other operated under short-term permits (lasting less than one year). All the 5-year permits expired around 10 years ago, and since that time, all the businesses have been issued short-term permits annually to allow them to continue operations while the environmental analysis of the proposal to issue 10-year permits was completed.

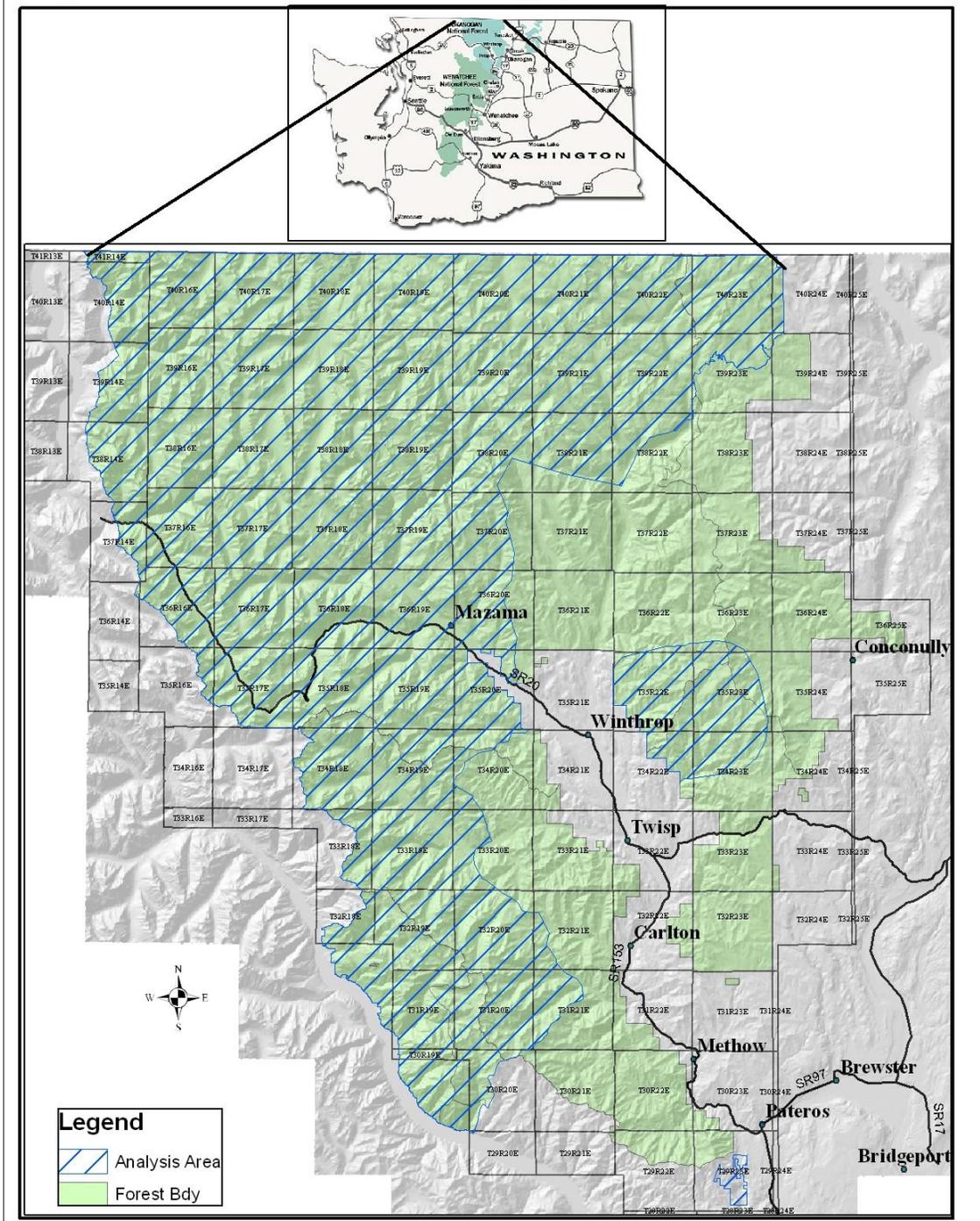
This document displays the analysis of issuing 10-year term pack and saddle stock outfitter-guide special use permits these businesses, or to other suitable businesses if those listed stop operations. The current combined number of actual service days for all existing short-term permits represents around 2% of the overall outfitted and non-outfitted visitor days (defined as one person for one day) across the analysis area, and approximately 9% of all pack and saddle stock use. **Map S-1 on page Summary-2** is a vicinity map of the area, and **Map S-2 on page Summary-3** shows the analysis area.

Purpose and Need for Action

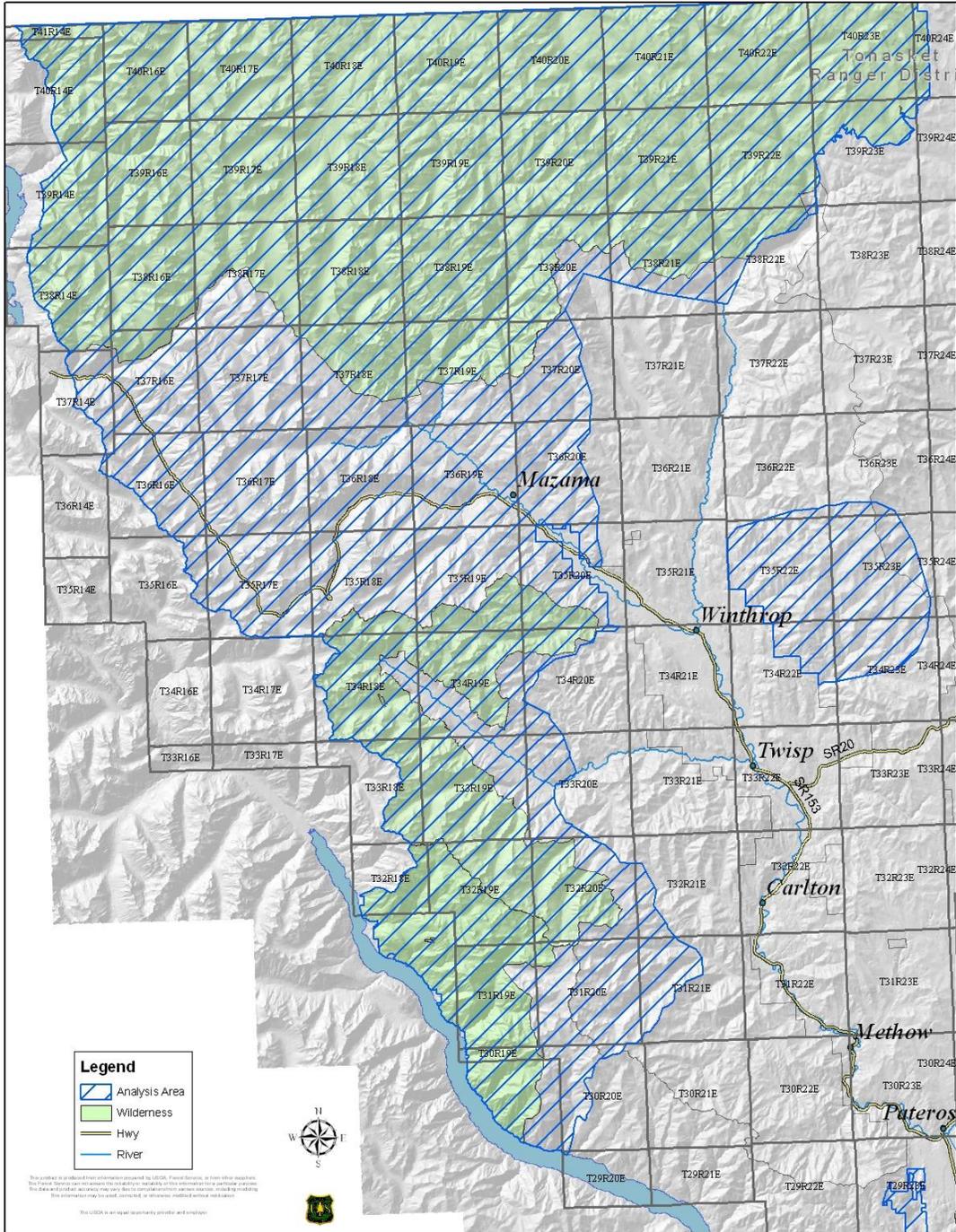
The purpose and need is the objectives of the analysis. It provides the underlying reasons for the Forest Service in developing the Proposed Action. The purpose and need for action of this analysis is three-fold:

- respond to special use permit applications from current pack and saddle stock outfitter-guides,
- protect wilderness character in the Pasayten and Lake Chelan-Sawtooth Wilderness Areas while providing necessary pack and saddle stock outfitter-guide commercial services,
- amend forest plan standards and guidelines for campsite barren core (see Glossary) in wilderness to be consistent with the designated party size for pack and saddle stock outfitter-guides (12 people and 18 head of stock).

Map S-1. Pack and Saddle Stock Outfitter-Guide Permit Vicinity Map



Map S-2. Pack and Saddle Stock Outfitter-Guide Permit Analysis Area



Respond to Permit Applications

Previously-issued term special use permits for the outfitter-guides listed at the beginning of this chapter have expired and each of the outfitter-guides has submitted an application for 10-year term permits. A purpose and need for action is to respond to these applications.

The Forest Service Special Uses Handbook (FSH 2709.11, USDA Forest Service 2004a) specifies the steps to follow for proposals (applications) that have been accepted. Section 12.5 states a “proposal is considered a proposed action for the purposes of NEPA when it is accepted as a formal written application”. The Forest Plans either give priority to authorizations that provide a public service (Okanogan Forest Plan, page 4-47), or where there is a demonstrated public need or demand for recreation service (Wenatchee Forest Plan, page E-11). The Okanogan Forest Plan encourages the use of recreation service partnerships and special use authorizations where they are compatible with the goals of the management area (Okanogan Forest Plan, pages 4-38 to 4-39). The Wenatchee Forest Plan also recognizes that outfitter-guides provide valuable recreational opportunities for the segment of the public who do not have the expertise, equipment or physical capabilities to enjoy these experiences on their own (Wenatchee Forest Plan, page E-11).

Protect Wilderness Character While Allowing Minimum Commercial Services

The current permit areas include the Pasayten and Lake Chelan-Sawtooth wilderness areas. The general purpose and need for commercial services in wilderness is to preserve the wilderness character and provide commercial services “to the extent necessary for activities which are proper for realizing recreational or other wilderness purposes” (Wilderness Act). There is a need to protect wilderness character while providing necessary pack and saddle stock outfitter-guide commercial services.

The Forest Service completed the analysis for both the need and extent necessary, and documented the findings in a paper titled “Determination of Need and Extent Necessary for Commercial Services (Outfitters and Guides) in the Pasayten Wilderness and Lake Chelan-Sawtooth Wilderness”, June 2010 (USDA Forest Service, 2010). This paper is referred to as the “Needs Assessment” in this document.

The analysis found there is a need for pack and saddle stock outfitter guides in wilderness. The criteria used for the evaluation included:

- Is the activity allowed in wilderness?
- Does the activity educate clients about the wilderness resource?
- Does the activity promote solitude, or primitive and unconfined recreation?
- Does the activity provide a public purpose, and does the level of skill, knowledge, equipment, and safety required for the activity support the need for commercial services?

Pack and saddle stock use is an appropriate mode of transportation in wilderness, since it does not include any mechanized or motorized equipment. Outfitter-guides teach their clients about wilderness directly in conversations about wilderness, and indirectly through demonstrating how to travel and stay in the wilderness without modern conveniences. Pack and saddle stock outfitter-guides trips promote solitude by taking clients to remote locations within wilderness, and letting them experience primitive and unconfined recreation. The outfitters also serve a public purpose by offering trips for recreation, scenic viewing, and historic use to the public.

Their services are needed by an element of the public due to the fact that many people are not skilled in stock handling, do not own stock and equipment, do not have the knowledge of stock handling techniques that minimize resource damage, and would be endangering their lives or the lives of others because of the hazards associated with stock.

The minimum amount of commercial services needed to provide for recreation is not a number that can be precisely calculated. The analysis of the impact of existing recreation use (including outfitter-guides) on wilderness character has shown that there are localized impacts to the opportunities for solitude, but these are not interfering with the current upward trend in wilderness character for the Pasayten or Lake Chelan-Sawtooth wildernesses. Current conditions meet or exceed the expectations of the vast majority of wilderness visitors (Burns, et al, 2010). The current recreation use, including the outfitter-guides complies with nearly all the existing Forest Plan standards and guidelines.

The Forest Service has a need for commercial pack and saddle stock outfitter-guides in order to provide for wilderness appropriate recreation, based on the analysis of need discussed above. Approximately 12% of the pack and saddle stock users in the Pasayten Wilderness have been outfitted annually, over the past 10 years; with approximately 3% in the Lake Chelan-Sawtooth Wilderness. This is the minimum extent necessary for these commercial services. This number is at or very near the minimum number required for businesses to stay in operation. If the level was reduced, there is a high likelihood that some businesses would fail. This would create a high probability of unpredictable changes in the types of services available, and a risk to the Forest Service's ability to meet the identified needs.

The use levels in both wildernesses is within the social and biophysical capacity, and allocating 12% of the anticipated 2020 use pack and saddle stock use levels in the Pasayten and 3% of the use in the Lake Chelan-Sawtooth will not exceed capacity. Therefore, the minimum number of service days needed for pack and saddle stock outfitter guides is 2,000 in the Pasayten and 720 in the Lake Chelan-Sawtooth.

Revise Wilderness Barren Core Campsite Standards

Currently both the Okanogan and Wenatchee Forest Plans have inconsistent management direction regarding party sizes and maximum vegetation loss sizes (USDA, 1989a and USDA, 1990). Wilderness standards and guidelines allow for a party size of 12 people and 18 head of stock (standard and guideline MA 15B-21N in the Okanogan Forest Plan, and Table IV-15, page IV-77, Wenatchee Forest Plan), yet campsites can have no more than 400 to 1,000 square feet of vegetation loss or barren core, depending on the Management Area or Wilderness Recreation Opportunity Spectrum Class (MA 15B-22b, Okanogan Forest Plan, and Table IV-5, page IV-77, Wenatchee Forest Plan). It is physically impracticable to fit pack and saddle stock outfitter-guide camps with 12 people and 18 head of stock inside areas of from 400 to 1,000 square feet of bare mineral soil. There is a need to make campsite barren core standards and guidelines and party size allowances compatible for pack and saddle stock outfitter-guides in wilderness in order to provide the necessary pack and saddle stock outfitter-guide commercial services.

When the Forest Plans were adopted in 1989 and 1990, standards regarding acceptable campsite impacts were incorporated. Those standards were based on the science and literature available at the time, with the awareness that there were some long-standing existing campsites

that exceeded the Forest Plans standards for acceptable size. These same campsites still exist and are currently used by outfitter-guides and the non-outfitted public.

In the time between when the Forest Plans were published and the present (nearly two decades), substantial research on recreation impacts in wilderness has been conducted, and the results have consistently suggested that utilizing campsites where impacts already exist is far preferable to and more likely to comply with the non-degradation principle than is excluding use from these existing sites if the likely result is creation of new, additional impacts (new campsites) as people are displaced from the closed sites (Cole and Hall, 1992). Many of the sites that were not within standards at the time the plan was adopted are in improved or stable condition, although they remain outside Forest Plan standards.

Even though wilderness condition has been on an upward or stable trend since designation, groups of 12 people and 18 head of stock perpetuate camps with a barren core in some areas. Generally, groups of 12 people and 18 head of stock could perpetuate barren core conditions up to 5,250 square feet (see **Appendix A** for calculations). Amendment of the Forest Plans is a mechanism to create compatibility between barren core standards and party size allowances for pack and saddle stock outfitter-guide camps in wilderness that would not increase current levels of barren core and would allow these needed commercial services to continue.

Proposed Action (Alternative 2)

The proposed action is developed early in the process to authorize, recommend, or implement an action to meet stated purposes, needs, and goals based on the best known information. It is used to generate issues for further study. Alternative 2 described below and in Chapter 2 is, in large part, the proposed action that was mailed to interested parties during public scoping. The number of service days was modified to meet current manual direction for determining service days (FSH 2709.11, Chapter 40).

The Okanogan-Wenatchee National Forest Supervisor proposes to issue ten-year, term special use permits to the following pack and saddle stock outfitter-guide companies in the Pasayten Wilderness, Lake Chelan-Sawtooth Wilderness, Sawtooth Backcountry, North Cascades, Middle Methow, Bear/Ramsey/Volstead, and Alta Lake areas following completion of the analysis process (likely spring 2011):

- Backcountry Burros
- Cascade Wilderness Outfitters
- Deli Llama Wilderness Adventures
- Early Winters Outfitting
- North Cascade Outfitters
- North Cascade Safaris
- Sawtooth Outfitters

Permits could also be issued to other acceptable businesses if any of the above businesses cease operations, or have permits revoked, as long as the maximum annual services days presented below are not exceeded.

A maximum of 4,620 annual priority use service days would be assigned to the outfitters, or replacements. A service day is defined as one outfitter-guide client for one day. Each ten-year permit would include a specific number of priority use service days that would equal the highest amount of actual use each has had in the five years prior to the issuance date. Any days not assigned would be held in a pool that could be accessed by the outfitter-guides to cover days that exceed the number of assigned day (FSH 2709.11).

Permit areas include all MA 15B areas in the Pasayten and Lake Chelan-Sawtooth Wilderness Areas on the Okanogan National Forest, and the portion of the Lake Chelan-Sawtooth Wilderness on the Wenatchee National Forest allocated to Transition, Primitive, and Semi-Primitive, and the North Cascades, Sawtooth Backcountry, Bear/Ramsey/Volstead, Middle Methow, and Alta Lake areas. These areas are shown on **Map 1-3 in the Map Section** of the Draft Environmental Impact Statement.

The proposed action includes assigned site locations for camps at Bald Mountain, Sheep Mountain, Crow Lake, and Beaver Creek. An existing camp at Whistler would be designated as an additional assigned site. Assigned sites are locations authorized for occupancy and use for which a fee is paid by the permit holder (also called 'designated' or 'reserved' sites). The listed sites are in the Pasayten Wilderness (refer to **Map 1-11 in the Map Section** of the Draft Environmental Impact Statement). Assigned sites are primarily used for guided horseback trips with cooked meals and most or all camping gear provided. Outfitter-guides can set up camps at these locations for the entire season. All camp equipment except hitch rails, corrals, and tent poles are removed from the campsite at season end and not cached over winter. Camp locations for all other trips are limited to existing camp locations. Equipment and supplies are not left at these locations for more than 24 hours when camp is not occupied. Assigned site locations allow better monitoring because use impacts would be solely from outfitter-guide activity. Additional assigned sites could be designated to allow for closer monitoring and subsequent modification of use to address resource concerns and assist in outfitter-guide operations.

The proposed action includes assigned sites for base camps at the Andrews Creek, Billygoat, Slate Creek, and Crater Creek trailheads; Fish Creek camp (Chelan) would also be used. These locations are outside wilderness. Each location has corrals, watering troughs, and other improvements necessary to protect resources. The assigned camps and base camps are shown on **Map 1-11 in the Map Section** of the Draft Environmental Impact Statement.

Forest Plan Amendment

The following standard and guideline would be added to the Okanogan and Wenatchee Forest Plans. It would pertain only to pack and saddle stock outfitter-guide operations in wilderness.

- *“Pack and saddle stock outfitter-guides shall not be allowed to increase the existing amount of barren core (bare, mineral soil) in established campsites. In campsites where the existing amount of barren core exceeds 5,250 square feet, outfitter-guides shall not use more than 5,250 square feet of the barren core. All pack and saddle stock outfitter-guides shall use the same delineated, 5,250 square-foot area for each camp and shall not use any area outside of the delineated 5,250 square-foot area.”*

Public Involvement

In the late 1990s, the Methow Valley Ranger District started receiving comments and concerns from a few individuals and groups about pack and saddle stock outfitter-guide activities in the Pasayten Wilderness. Field observations from some people indicated that recreation activities in general, and outfitter-guide activities in particular, did not meet Forest Plan standards and guidelines. In response to the concerns, the District developed a “Wilderness Recreation, Stock, and Outfitter Use Strategy and Action Plan”, signed by the Forest Supervisor on April 24, 2000 (USDA Forest Service 2000e). This plan, and subsequent accomplishment reports and action plans were mailed to everyone who expressed concern or interest in the topic, inviting further comments on the situation.

A scoping letter requesting comments on the proposed action to issue pack and saddle stock outfitter-guide special use permits was mailed to persons and organizations on the District mailing list on November 15, 2000. The proposed action included a non-significant amendment to standard and guideline MA15B-22B to allow outfitter campsites in wilderness to exceed 400 square feet of vegetation loss. A total of 110 letters were received in response to the Wilderness Action Plan and the scoping letter.

Following publication of a notice of intent to file an environmental impact statement in the Federal Register on June 22, 2005, an updated scoping letter was mailed on June 23, 2005 to those who provided input on the Wilderness Action Plan or responded to the November 15, 2000 scoping letter, in addition to those on the Tonasket, Chelan, and Methow Valley Ranger District mailing lists. The proposal had changed to increase the number of service days, and to eliminate the Forest Plan amendment. Eleven letters were received in response to the scoping letter and Notice of Intent.

The proposed action was refined to the current version after publishing of the Forest Service Handbook 2709.11, which gave specific direction on calculating service days, and upon further analysis of compliance with forest plan standards and guidelines. The Forest Service determined that an amendment would be needed to implement the proposed action. An updated Notice of Intent was published in the Federal Register on July 21, 2010, correcting the estimated publication date and number of service days, and including specifics about the proposed forest plan amendment. A letter was also sent on July 30, 2010 to those on the project mailing list updating the DEIS release date, and explaining the proposed forest plan amendment.

The Issue Tracking Form in the analysis file summarizes and responds to each comment. All letters are included in the Responses to Scoping folder in the analysis file.

Government-to-government letters were mailed to the Yakama Indian Nation and the Confederated Tribes of the Colville Reservation in June, 2005, requesting consultation on the proposal. Neither tribe identified concerns about the proposal.

Issues

Issues are points of concern about environmental effects that may occur as a result of implementing the proposed action. Issues provide focus for the analysis of environmental effects and influence alternative development, including development of mitigation measures.

Key Issues (also known as significant issues) are used to formulate alternatives to the proposed action, prescribe mitigation measures, and analyze environmental effects. They are used to compare the alternatives in the Comparison of Alternatives Table in Chapter 2. Key Issues are referred to by the Council on Environmental Quality (CEQ) as significant because of the potential extent of their geographic distribution, duration of their effects, or intensity of interest or resource conflict, if not mitigated or otherwise addressed. Key Issues were identified by the Interdisciplinary (ID) Team and approved by the Responsible Official.

In addition to “Key Issues,” “other” issues were raised. They were considered as this project was developed, analyzed and may have generated mitigation measures. However, they are less focused on the elements of the Purpose and Need and did not influence formulation of alternatives. They are addressed in the effects analysis (Chapter 3).

Finally some issues were; 1) outside the scope of the proposed action, 2) already decided by law or regulation, Forest Plan, or other higher level decision, 3) irrelevant to the decision to be made, or 4) conjectural and not supported by scientific or factual evidence. The Council on Environmental Quality NEPA regulations require identification and elimination from detailed study the issues which are not significant or which have been covered by prior environmental review (Sec. 1506.3). A summary of all public issues and their disposition is available in the project analysis file.

KEY ISSUES

Key Issue 1: Current and proposed pack and saddle outfitted use does not comply with some Forest Plan wilderness standards and guidelines or with the Wilderness Act because the party size and amount of use perpetuates large camps and degrades the condition of the wilderness.

Some respondents considered conditions in the Pasayten and Lake Chelan-Sawtooth Wilderness Areas to be out of compliance with Forest Plan standards and guidelines and the Wilderness Act. Some felt that problems were created by the amount of pack and saddle stock outfitter-guide activity. Some were concerned about the number of hiker encounters with pack strings. Others commented on the size of the areas of vegetation loss and bare compacted soil, number of trees with exposed roots in campsites, number of trees damaged by recreation activities, and other standards and guidelines. Some comments described conflict between different user groups, and between outfitted and non-outfitted groups. Some expressed concern about wilderness degradation.

The effects are measured by:

- qualitative discussion about compliance with the Wilderness Act in terms of the qualities that make up wilderness character: untrammeled, undeveloped, natural, and opportunities for solitude or primitive and unconfined recreation.
- qualitative discussions about the standards and guidelines, focusing on those not being met, and the effect the proposed Forest Plan amendment will have on wilderness character.

These effects were analyzed, and are disclosed in the Wilderness section of Chapter 3.

Key Issue 2: Current and proposed pack and saddle stock outfitted use could degrade wetlands and habitat for native plant species when pack and saddle stock trample wetland and riparian vegetation and graze in wetlands and other areas.

People expressed concern about the effect pack and saddle stock outfitter-guides are having on plants; that the current number of service days was leading to damaged wetlands. People were concerned that stock grazing was leading to changes in plant communities and loss of vegetative cover in wetlands and other areas. Some expressed concern about the effects of livestock manure and urine on plant species; these people generally felt that the proposed number of service days was too high.

The effects are measured by:

- estimated number of acres of wetland within 500 feet of pack and saddle stock camps;
- qualitative discussion about the effects of activities on the wetlands;
- effects determination statements for threatened, endangered, and sensitive plant species;
- qualitative discussion of the effects of grazing on plant composition.

These effects were analyzed, and are disclosed in the Botany section of Chapter 3.

Key Issue 3: Current and proposed pack and saddle stock outfitted use could degrade some habitat for threatened, endangered, or sensitive wildlife species through increased encounters between people and animals, or through habitat degradation.

Comments expressed concern over the outfitter-guide effects on wildlife, specifically threatened, endangered, or sensitive species. These people generally felt that the proposed number of service days was too high.

The effects are measured by:

- effects determination statements for threatened and endangered wildlife species;

The effects are disclosed in the Wildlife section of Chapter 3. A biological assessment (BA) was completed for the analysis; the US Fish and Wildlife Service (USFWS) concurred with the findings.

Key Issue 4: Current and proposed pack and saddle stock outfitted use could degrade water quality and aquatic resources when pack and saddle stock cross streams on trails, or access water sources and damage riparian vegetation, break down stream banks, and degrade water quality.

Concern was expressed about the effects of outfitter-guide activities, specifically impacts from stock on water quality and aquatic resources. It was suggested that the number of service days be reduced to reduce the impact.

The effects on water quality and riparian habitat are measured by:

- effects determination statements from Biological Assessment for threatened and endangered fish species;
- qualitative discussion of compliance with Northwest Forest Plan Aquatic Conservation Strategy (ACS) and PACFISH Riparian Management (RMO) Objectives;
- qualitative discussion on compliance with state water quality standards and the Clean Water Act;
- effects of open grazing on riparian areas, streams, and lakes,
- qualitative discussion about stream sedimentation;
- qualitative discussion of stream flow
- qualitative discussion of sediment from trails
- qualitative discussion of fecal coliform levels.

The effects were analyzed, and are disclosed in the Hydrology and Aquatics sections of Chapter 3.

OTHER ISSUES

In addition to resources associated with the Key Issues, the public identified other concerns about the effects of the proposed action on a variety of other resources. These concerns were addressed through mitigation measures and were not used in alternative formulation. The effects on them are described in Chapter 3 of this document. The issues include:

- Pack and saddle stock outfitter-guides could introduce noxious weeds into currently weed-free areas, such as wilderness, in stock manure.
- Pack and saddle stock outfitter-guides could degrade air quality with smoke from campfires.
- Firewood gathering by outfitter-guides could degrade the environment by removing down woody debris and limiting or eliminating this habitat component.
- Reducing the number of service days allowed could lead to some existing pack and saddle stock outfitters going out of business because of reduced revenues.
- Pack and saddle stock outfitter-guides could degrade the experience of other recreation users outside of wilderness by perpetuating conflicts between outfitted and non-outfitted user groups, increasing the number of people recreating in any given area, and adding to conflicts between user groups.
- Pack and saddle stock outfitter-guide activities could lead to soil damage and displacement in meadows and other areas by stock trampling, grazing, and crossing wet areas.
- Pack and saddle stock outfitter-guide grazing could exceed Forest Plan standards and guidelines pertaining to forage utilization when stock are allowed to graze unconfined around campsites.

Other issues were identified but eliminated for a variety of reasons. These issues and the justification for elimination are included in Chapter 2 of the DEIS.

Alternatives Considered in Detail

Alternative 1 is the No Action alternative. The Proposed Action is Alternative 2. Alternative 3 was developed to respond to the issues and would reduce annual service days to 3,125 and not include additional assigned sites.

ALTERNATIVE 1--NO ACTION

Objective

Eliminate pack and saddle stock outfitter-guide recreation use within the analysis area.

Description

This alternative would not issue special use permits to pack and saddle stock outfitter-guides. There would be no commercial pack and saddle stock outfitter-guide operations on the Ranger Districts.

Mitigation and Monitoring

No specific mitigation or monitoring would occur that is not already prescribed by the Forest Plans.

ALTERNATIVE 2

Objectives

Alternative 2 would:

- Continue to provide pack and saddle stock outfitter-guide services in the analysis area, which includes the Pasayten and Lake Chelan-Sawtooth wilderness areas, North Cascades, Sawtooth Backcountry, Middle Methow, Bear/Ramsey/Volstead, and Alta Lake analysis area sub-units on the Methow Valley, Tonasket, and Chelan Ranger Districts.
- Amend the Okanogan and Wenatchee Forest Plans to make outfitter-guide campsite condition standards and guidelines consistent with established party size standards, while managing the Wilderness Areas to maintain wilderness character.
- Provide enough service days in the Pasayten and Lake Chelan-Sawtooth wildernesses to meet the minimum extent necessary to provide commercial services for wilderness appropriate activities.
- Establish a number of service days that will follow handbook direction and sustain the highest amount of used service days over the past five years and create a pool of days that will give an opportunity for pack and saddle stock outfitter-guides businesses to develop a modest amount of growth (25%).

Description

This alternative would issue 10-year term special use permits for pack and saddle stock outfitter-guides on the Methow, Chelan, and Tonasket Ranger Districts. Assigned sites (camps and base camps) would allow closer monitoring and modification of operations to reduce the size of the barren core and address other resource concerns. Assigned camp sites would be used for most full-service camps. Drop and progressive camp locations are not specified. A total of 4,560 annual service days would be divided among the outfitters, or replacements who meet term permit requirements.

The number of service days would be distributed among the different portions of the analysis area, with each business receiving approximately the same proportion of service days it had in the past, compared to all pack and saddle stock outfitters. **Figure S-1** shows the distribution in the different areas

Figure S-1. Alternative 2: Number of Service Days by Area and Total

Area	Total Client Days
Pasayten Wilderness	2,000
Lake Chelan-Sawtooth Wilderness	720 (240 on Methow Valley) (480 on Chelan)
North Cascades	200
Sawtooth Backcountry	400 (140 on Methow Valley) (260 on Chelan)
Bear/Ramsey	100
North Cascades (Day Rides)	450
Alta Lake (Day Rides)	750
Middle Methow	0
Total	4,620

The day rides in the North Cascades and Alta Lake areas are horse riding or hiking with pack support for a portion of, or an entire day. Rides range from a half-hour to all day, with the majority lasting one hour. Day rides generally leave from private land adjacent to NFS land, and occur on trails seldom used by non-outfitted hikers or horseback riders.

The rest of the service days are for overnight camping. Camp locations would be assigned to the horse and mule packers to allow closer monitoring. In the Pasayten Wilderness assigned sites include camps at Bald Mountain, Sheep Mountain, and Beaver Creek, Crow Lake, and Whistler. The assigned camps would be primarily used for guided horseback riding trips with cooked meals, and most or all camping gear provided. Holders would be allowed to set up camps at these locations, and leave them for the entire season. All camp equipment except hitch rails, corrals, and tent poles would be removed from the camp at the end of the season, and would not be cached over the winter.

Camp locations for all other trips would be limited to existing, pre-assigned locations. Camping equipment and supplies could not be left in these locations for more than 24 hours when the camp is not occupied.

Existing assigned base camps Andrews Creek, Billygoat, Crater Creek, and Slate Creek trailheads and at the Fish Creek Camp would be used. Each location would have corrals, livestock watering troughs, and other improvements necessary to protect resources. These base camps would provide places where outfitter-guides can keep pack and saddle stock during times of high use, and as starting locations where clients meet outfitters.

Forest Plan Amendment

A non-significant amendment would make standards for outfitter-guide campsites more compatible with party size limitations and provide for non-degradation of wilderness conditions as required in Okanogan Forest Plan (USDA Forest Service 1989b) (MA15B-21D, page 4-91). For the Wenatchee Forest Plan (USDA Forest Service 1990) the amendment would improve the compatibility of outfitter-guide campsites with some 'limits of acceptable change' indicators (Table IV-15, page IV-77). The amendment would only apply to pack and saddle stock outfitter-guides in the Pasayten and Lake Chelan-Sawtooth Wilderness Areas. The following standard and guideline would be added to the Okanogan and Wenatchee Forest Plans.

- *“Pack and saddle stock outfitter-guides shall not be allowed to increase the existing amount of barren core (bare, mineral soil) in established campsites. In campsites where the existing amount of barren core exceeds 5,250 square feet, outfitter-guides shall not use more than 5,250 square feet of the barren core. All pack and saddle stock outfitter-guides shall use the same delineated, 5,250 square-foot area for each camp and shall not use any area outside of the delineated 5,250 square-foot area.”*

The Okanogan Forest Plan currently does not allow vegetation loss to exceed 400 square feet (MA15B-22B). The Wenatchee Forest Plan allows vegetation loss of up to 1,000 square feet (Table IV-15, page IV-77). It is physically impracticable to fit camps with 12 people and 18 head of stock inside areas of 400 to 1,000 square feet. Using computations (see **Appendix A**), 5,250 square feet was identified as an area in which 12 people and 18 head of stock could reasonably camp. Due to historical use, including large party-sizes and livestock grazing, some existing camps exceed 5,250 square feet. Continued use and short growing seasons have perpetuated some of these camps even though livestock grazing is no longer occurring and party size is now limited. This amendment would require outfitter-guides to identify the portion of the impacted area for consistent use. This would be included in the Camp Management Plan for each campsite. Areas outside of the designated area would not be used, allowing recovery to proceed. This amendment would improve the overall trend of non-degradation of wilderness conditions.

Based on direction found in the Forest Service Manual 1926.51 (USDA Forest Service 2006), this is a non-significant amendment to both Forest Plans for the following reasons,

- The amendment applies only to outfitter-guide use areas in the Pasayten Wilderness and the Lake-Chelan-Sawtooth Wilderness (Okanogan Forest Plan Management Area 15B and Wenatchee Forest Plan primitive and semi-primitive wilderness classes).

- The amendment applies only to pack and saddle stock outfitter-guides and not to other users of wilderness. Outfitter-guide use is 2% of overall use in the Pasayten Wilderness and 1% of overall use in the Lake Chelan-Sawtooth Wilderness.
- The amendment is designed to avoid degradation of wilderness conditions and limit acceptable change; some existing impacts would diminish over time.
- No management area boundaries would change.

Therefore the amendment is not significant because it is a minor change that does not significantly alter the multiple use goals and objectives for long-term land and resource management.

ALTERNATIVE 3

Objectives

Alternative 3 would:

- Continue to provide pack and saddle stock outfitter-guide in the Pasayten and Lake Chelan-Sawtooth Wilderness Areas and in the backcountry on the Methow Valley, Tonasket, and Chelan Ranger Districts.
- Amend the Okanogan and Wenatchee Forest Plans to reduce the party size for outfitter-guides and make allowed campsite conditions compatible with party size.
- Keep number of service days allocated to pack and saddle stock outfitter-guides below the minimum extent necessary for commercial services in wilderness
- Reduce the number of service days to address concerns about water quality, wilderness, riparian habitat, wildlife, wetlands, and native plant species. Establish a number that equals the average number of used service days over the past five years, but does not allow for any increase or growth of existing outfitters.

Description

This alternative would issue 10-year, term special use permits for outfitter-guides in wilderness and the backcountry on portions of three Ranger Districts. A total of 2,660 service days would be divided between the outfitters, or replacements for these outfitters who meet requirements for term permits.

The number of service days would be distributed among the different portions of the analysis area, with each business receiving approximately the same proportion of service days it had in the past, compared to all pack and saddle stock outfitters. **Figure S-2** shows the distribution in the different areas.

Figure S-2. Alternative 3: Number of Service Days by Area and Total

Area	Priority Use Client Days ¹
Pasayten Wilderness	1,000
Lake Chelan-Sawtooth	320 (100 on Methow Valley) (220 on Chelan)
North Cascades	180
Sawtooth Backcountry	160 (70 on Methow Valley) (90 on Chelan)
Bear/Ramsey	50
North Cascades (day rides)	360
Alta Lake (day rides)	590
Middle Methow	0
Total	2,660

The day rides in the North Cascades and Alta Lake areas are horse riding or hiking with pack support for a portion of, or an entire day. Rides range from a half-hour to all day, with the majority lasting one hour. Day rides generally leave from private land adjacent to NFS land, and occur on trails seldom used by non-outfitted hikers or horseback riders.

The rest of the service days would be for overnight camping. Assigned sites for camps in the Pasayten Wilderness at Bald Mountain and Sheep Mountain would be used, but no additional camps would be designated. Assigned sites are used for guided horseback riding trips with cooked meals, and most or all camping gear provided. Holders would be allowed to set up camps at these locations, and leave them for the entire season. All camp equipment except hitch rails, corrals, and tent poles would be removed from the camp at the end of the season, and would not be cached over the winter. Camp locations for all other trips would be limited to existing locations. Camping equipment and supplies could not be left in these locations for more than 24 hours when the camp is not occupied.

Existing assigned sites for base camps at the Andrews Creek, Billygoat, Crater Creek, and Slate Creek trailheads, and at Fish Creek would be used. Each location would have corrals, livestock watering troughs, and other improvements necessary to protect resources. These base camps would provide places where outfitter-guides can keep pack and saddle stock during times of high use, and as starting locations where clients meet the outfitters.

Forest Plan Amendment

A non-significant amendment to the Forest Plans would designate a reasonable amount of barren core in pack and saddle stock outfitter-guide camps in order to allow these needed commercial services to continue. For this alternative the following standards and guidelines would be added to the Okanogan and Wenatchee Forest Plans. These standard and guidelines

¹ Priority Use refers to the number of client days the holder is guaranteed each year.

would pertain only to pack and saddle outfitter-guide operations in the Pasayten and Lake Chelan-Sawtooth Wilderness Areas.

- *“Pack and saddle stock outfitter-guides shall have a maximum party size of 12 (combination of people and stock).”*
- *“Pack and saddle stock outfitter-guides shall not be allowed to increase the existing amount of barren core (bare, mineral soil) in established campsites. In campsites where the existing amount of barren core exceeds 2,800 square feet, outfitter-guides shall not use more than 2,800 square feet of the barren core. All pack and saddle stock outfitter-guides shall use the same delineated, 2,800 square-foot area for each camp and shall not use any area outside of the delineated 2,800 square-foot area.”*

Based on direction found in the Forest Service Manual 1926.51 (USDA Forest Service 2006), this is a non-significant amendment to both Forest Plans for the following reasons,

- The amendment applies only to outfitter-guide use areas in the Pasayten Wilderness and the Lake-Chelan-Sawtooth Wilderness (Okanogan Forest Plan Management Area 15B and Wenatchee Forest Plan primitive and semi-primitive wilderness classes).
- The amendment applies only to pack and saddle stock outfitter-guides and not to other users of wilderness. Outfitter-guide use is 2% of overall use in the Pasayten Wilderness and 1% of overall use in the Lake Chelan-Sawtooth Wilderness.
- The amendment is designed to avoid degradation of wilderness conditions and limit acceptable change; some existing impacts would diminish over time.
- No management area boundaries would change.

Therefore the amendment is not significant because it is a minor change that does not significantly alter the multiple use goals and objectives for long-term land and resource management.

Mitigation Measures for Alternatives 2 and 3

These measures would be used to reduce negative effects on project area resources. They are considered part of the alternatives and would be incorporated as such. All mitigation measures listed are common to Alternatives 2 and 3, unless otherwise noted, and will be required if one of these alternatives is implemented. Mitigation measures are designed to ensure that human activities in wilderness shall follow a non-degradation policy (Okanogan Forest Plan Standard and Guideline MA15B-21D) within the limits of acceptable change (Wenatchee Forest Plan Table IV-15, page IV-77).

These mitigation measures also serve as the Best Management Practices (BMP) to protect water quality, as required by the forest plans.

In addition to the measures listed below, **Appendix B** lists general prohibitions and prohibitions listed in prior Okanogan and Wenatchee National Forest orders for specific wilderness and backcountry areas under 36 CFR (Code of Federal Regulations) 261. These prohibitions are essentially legal mitigation established for resource protection and are incorporated by reference. Some of these prohibitions are indicated in parenthesis after project-specific mitigation measures that follow.

This list of mitigation measures will become standard practice for the pack and saddle stock outfitter-guides and incorporated into annual operating plans. Placing them in the operating plan would be an effective way of insuring they are followed, since the outfitters would risk non-compliance and permit action if they do not comply.

1. Campsites and Trails

The objective of these measures would be to ensure compliance with the non-degradation policy in wilderness, minimize the effect of camps and trails on vegetation, wildlife habitat, water quality, aquatic habitat, and soil.

- a)** All camp locations, including full-service and drop camps, will be approved prior to use. If an alternative campsite must be used due to occupation or emergency, the outfitter will select an established campsite large enough to accommodate the party size. The outfitter will notify the permit administrator within one week from the end of the trip.
- b)** Outfitter camps will set an example for all to follow concerning leave-no-trace camping practices and minimizing the impact on wilderness character. Constructing tent sites will be prohibited. All camp facilities will be temporary in nature (unless otherwise specifically approved in the operating plan) and shall be taken down and removed outside the authorized use period. The outfitter will be encouraged to use earth tone colored tents, tarps, and other camping equipment to better blend with natural surroundings.
- c)** Camp Management Plans will be developed for assigned sites. Camp facilities for the necessary level of operation will be identified and excess facilities phased out. Excess areas of compacted bare mineral soil will be identified for each assigned camp. Activities that prevent the revegetation or recovery of these excess areas will not be allowed. All equipment and materials that have been or will be transported into the wilderness will be taken out at the end of the authorized period of use each season.
- d)** In established campsites within wilderness where the existing amount of barren core exceeds 5,250 square feet (Alternative 2) or 2,800 square feet (Alternative 3), outfitter-guides will not be allowed to use more than 5,250 square feet of bare mineral soil area in Alternative 2 or 2,800 square feet in Alternative 3. Camp Management Plans will be developed for these sites, with the specific area of allowed use identified in the plan. The same camp area will be used on successive visits by all outfitters.
- e)** Non-assigned sites will be available on a “first-come, first-served” basis for either commercial or non-commercial camping purposes. All equipment and materials will be taken out at the end of each trip.
- f)** Outfitter-guides shall not increase the amount of bare mineral soil in any established wilderness campsite.
- g)** Outfitter-guides shall not create exposed roots on any new trees at any existing wilderness campsite.

- h) Outfitters will be prohibited from creating new campsites without specific authorization from the Forest Service. If existing campsites need to be closed to protect resources, additional sites may be designated by the Forest Service, and approved in advance of use.
- i) Campfires will be allowed where permitted in areas with sufficient down wood.
- j) No standing trees, including snags, will be cut or damaged, nor will any material be attached to trees with nails or wire. On rare occasions, standing trees or snags may be cut if an immediate, unavoidable safety hazard is posed.
- k) At assigned sites, firewood will be stored without a covering and out of sight of any Forest Service system trail. Only the amount of firewood to be utilized for the current use season will be stored. Skidding of firewood with stock will not be allowed. Firewood will not be stored at non-assigned sites.
- l) All guides and clients are subject to the same rules and regulations that pertain to the non-guided public regarding travel on roads and trails, and camping in backcountry and wilderness. Outfitter-guides shall review with clients pertinent regulations and appropriate use practices for backcountry and wilderness travel including those posted at trailheads and/or referenced in the operating plan. This applies to drop-camp clients as well as to guided groups.
- m) All applicable regulations will be reviewed with clients including any special orders establishing use restrictions at specific areas (see **Appendix B**).
- n) Outfitter-guides will review minimum-impact travel and camping practices with clients, including those at drop camps. Specific educational tools to be employed will be detailed in operating plans. Instruction on minimum impact will begin prior to the trip so clients arrive both mentally and physically prepared. Instruction will continue during the trip so clients understand the importance of using these techniques and can implement them consistently. The following pamphlets will be used as the standard: "Rocky Mountain Leave No Trace Skills and Ethics", "North American Leave No Trace Skills and Ethics", and "Horse Use Leave No Trace Skills and Ethics". Outfitter-guides will also teach clients about wilderness values as described in the Wilderness Act of 1964.
- o) Outfitted pack and saddle stock use in wilderness will be limited to existing trails with well established tread. Constructing, placing or maintaining any kind of trail or other improvement on National Forest System land without a special use authorization, contract, or approved operating plan is prohibited. (36 CFR 261.10a)
- p) Trail maintenance work needed for operations will be restricted to the maintained Forest Service system trails and access trails to established camps, unless prior approval is granted. Maintenance will be consistent with Forest Service trail standards and requires prior Forest Service approval.
- q) Outfitted pack and saddle stock use at Hidden Lakes will be limited to two parties at a time and two or three parties at a time at Spanish Camp/Rommel Lake, Corral Lake, and

Crow Lake, except during the September hunting season. This will be accomplished during itinerary review and scheduling and through permit administration.

2. Sanitation and Litter

The objective of these measures is to ensure that human waste, manure, garbage, hunting refuse, and dead stock animals do not become an attractant for wildlife or degrade water or campsite quality.

- a) All human excrement and toilet paper will be disposed of properly by burying it in a small shallow hole at least 200 feet from any water source, or by packing out. A slit trench or latrine may be used where there are more than 12 person days in a camp, or if a guide determines that clients lack judgment to properly use shallow holes. Slit trenches will be completely covered over and camouflaged when camp is vacated.
- b) Heavy concentrations of stock manure near campsites or in other areas where stock have been tied or held will be scattered.
- c) Parties engaged in hunting will ensure that stripped carcasses, gut-piles, hides, or other such refuse is disposed of away from campsites, trails, and sources of water.
- d) In the event that pack or saddle stock should die on National Forest System land, the District shall be notified promptly, and the outfitter will properly dispose of the dead animal.

3. Stock Grazing and Containment

The objective of these measures is to minimize the effects of stock grazing on wetlands, sensitive plants, water quality, vegetation, and aquatic habitat.

- a) Based on submitted itineraries and known resource conditions, outfitters may be required to carry supplemental feed.
- b) Overnight picketing of stock in subalpine meadows will not be allowed; loose herd grazing will be the preferred grazing method for outfitter stock.
- c) In the Pasayten Wilderness, hitching or tying pack or saddle stock directly to any tree for an extended period is prohibited. Additionally, hitching or tying any pack or saddle animal to any object, including a highline, when the point of hitch or tie is within 8 feet of any tree, for an overnight period, or so as to cause damage to the roots or bole of any tree is prohibited. (36 CFR 261.58aa) order #353 (July 2001).
- d) In the Lake Chelan-Sawtooth Wilderness and Sawtooth Backcountry, hitching or tying pack or saddle stock directly to any tree for an overnight period is prohibited. Additionally, hitching or tying any pack or saddle animal to any object, including a highline, when the point of hitch or tie is within 8 feet of any tree, for an overnight period, or so as to cause damage to the roots or bole of any tree is prohibited. (36 CFR 261.58aa) order 08-04-74 (April 1992).

- e) Outfitter-guides shall prohibit any grazing by pack or saddle animals within 200 feet slope distance of the shoreline of any lake. (36 CFR 261.57a and e)
- f) Outfitter-guides shall prohibit hitching, tethering, or hobbling any pack or saddle animals within 200 feet slope distance of any lake. (36CFR 261.58aa)
- g) Outfitter-guide pack and saddle stock grazing could be limited to designated suitable grazing areas during times, or in areas of high use.
- h) Stock must be ridden, or led, except when grazing, and not permitted to run loose on trails or travel routes.
- i) Where and whenever it becomes necessary to restrict or limit the use of native forage by pack and saddle stock for resource protection, the outfitter may be required to pack in and supply all necessary feed when range conditions do not allow grazing of pack stock.

4. Party Size

The objectives of these measures are to help reduce impacts from outfitter-guide camps in terms of size and grazing impacts.

- a) Party size over the established limits must be requested by outfitter-guides at least seven days in advance of departure. Oversize parties may be approved based on factors listed in Okanogan Forest Plan standard and guideline MA15B-21N, and in the Wenatchee Forest Plan on page E-4, item 1.f. (36 CFR 261.58f)
- b) Party size outside wilderness will be designated in the outfitter-guide operating plan.
- c) Only stock necessary for each trip will be permitted. No cripples, colts, or unbroken stock will be permitted, except for the trip duration if an animal becomes crippled during use.

5. Vegetation and Soils

The objective of these measures is to minimize effects of pack and saddle stock outfitter-guides on vegetation and soil.

- a) Other than approved trail maintenance work along Forest Service system trails, green trees and other live vegetation shall not be cut or removed, and efforts will be taken to minimize trampling or other damage to vegetation beyond those impacts likely to recover within one growing season.
- b) Soils displaced by activities such as latrine construction or pawing by stock will, to the extent practical, be replaced or smoothed out.
- c) Travel routes will be identified to minimize impacts to wet soil and meadow areas.
- d) Salt use will be approved in advance and applied in such a manner as to minimize wildlife attraction, and avoid trampling disturbance.

- e) Location of overnight stock handling facilities (corrals, hitch rails, highlines) will be designated and approved. Facilities will be designed to adequately handle concentrated stock use to minimize off-site effects.

6. Wildlife

The objective of these measures is to comply with habitat management requirements for threatened and endangered species, and to reduce the possibility of negative encounters between people and wildlife.

- a) Feeding or harassing of wildlife will be prohibited. Activities that may disrupt wildlife, such as camping next to active nest sites, water sources, or making excessive noise, shall be avoided. When observing animals, outfitters shall keep a distance to avoid influencing animal behavior, generally 100 to 300 feet or more.
- b) Outfitter-guides with clients engaged in hunting shall discuss the importance of distinguishing between grizzly bears and black bears, between lynx and bobcats, and between wolves and coyotes. It shall also be emphasized that grizzly bears, lynx, and wolves are protected by Federal law.
- c) Outfitter-guides and clients shall securely store, using wildlife-resistant containers or hanging methods, all food, garbage, toiletries, and other possible wildlife attractants. These measures will be discussed with clients. Outfitters shall follow any additional guidelines provided by wildlife biologists in regards to acceptable food and trash handling/storage methods.
- d) Negative encounters with bears (either grizzly bear or black bear) will be reported to the Methow Valley or Chelan Ranger Districts. Sightings of grizzly bears will be reported as soon as possible to either District.
- e) Rodent control (other than rat or mouse traps) will not be allowed unless specifically authorized in the annual operating plan.

7. Aquatic Resources

The objective of these measures is to comply with habitat management requirements for threatened and endangered species, and to ensure compliance with Aquatic Conservation Strategy and Riparian Management objectives.

- a) Provide stream and riparian habitat protection based on the Forest Plan as amended by PACFISH and the Northwest Forest Plan.
- b) Ensure Riparian Management Objectives (PACFISH) and Aquatic Conservation Strategy Objectives (Northwest Forest Plan) are met.
- c) Protect riparian habitat by maintaining shade and riparian vegetation adjacent to stream.

- d) Outfitter-guides who provide angling services or activities shall provide fishing regulations and bull trout identification information to personnel and clients.
- e) The Fish Camp campsite in the Wolf Creek drainage will be closed to camping from September 1 through October 15 to reduce the risk of trampling redds.
- f) Along Wolf Creek and the Lost River area of Hidden and Cougar Lakes and Diamond Creek, that contain bull trout, outfitter-guides and clients will not wade in streams from September 1 to October 15 to minimize the possibility of disturbing bull trout redds.
- g) Hazardous material handling or storage (including fuel) will be located at least 200 feet from streams.

8. Noxious Weeds

The objective of these measures is to prevent the establishment and spread of noxious weeds in the analysis area.

- a) Precautions will be taken to prevent the introduction and spread of noxious weeds on National Forest System land. Outfitter-guides and clients shall prevent the transport of any seeds by removing any plant material attached to vehicles, shoes, clothing, or the bodies of pack and saddle stock.
- b) Supplemental feed will be commercially processed feed, or weed-free certified processed hay cubes. Only certified weed-free hay shall be allowed on all National Forest System Land (36 CFR 261.58(t))
- c) Outfitters should consider feeding commercially-processed feed or hay that is certified weed-free for several days prior to trip departure to minimize the spread of weed seed through manure.
- d) Outfitters will follow a weed identification and mapping program under Forest Service direction. Forest Service will provide the weed information.
- e) Outfitters will be responsible for surveying campsites for weeds, and assisting in control measures as directed by the Forest Service.

Preferred Alternative

The preferred alternative is Alternative 2.

Environmental Consequences

Comparison of Alternatives

This section provides a side-by-side description of each alternative and a summary of how each alternative responds to the Purpose and Need and each Key Issue. See Chapter 1 for background on the issues, and Chapter 3 for a complete description of the effects and for the scientific basis for results in the summary table.

Figure S-3: Comparison of Alternatives

Action	Unit of Measure	Existing Condition	Alternative 1	Alternative 2	Alternative 3
Total Number of Service Days	Service Days	4,083	0	4,620	2,660
Total Number of Visitor Days (outfitted and private)	Visitor Days	221,922	219,441	222,429	220,489
Percent of Visitor Days Outfitted by Pack and Saddle Stock Outfitter-Guides	Percent	2%	0%	2%	1%
Total Number of Pack and Saddle Stock Visitor Days	Visitor Days	45,956	43,465	46,473	44,533
Percent of Pack and Saddle Stock Visitor Days Outfitted	Percent	9%	0%	10%	6%
Purpose and Need	Unit of Measure	Alternative 1	Alternative 2 (current condition)	Alternative 3	
1. Respond to Permit Applications for outfitter-guide permits.	Qualitative discussion	Would deny applications, and no pack and saddle stock outfitter-guide permits would be issued.	10-year permits would be issued with service day calculations consistent with FSH 2709.11.	10-year permits would be issued, but with 35% fewer service days compared to the current allowed use.	
2. Protect wilderness character in the Pasayten and Lake Chelan-Sawtooth Wilderness Areas while providing necessary pack and saddle stock outfitter-guide commercial services.	Qualitative discussion	The wilderness character would be protected, but no pack and saddle stock commercial services would be provided for realizing recreational or other wilderness proposes.	Wilderness character would be protected since impacts to opportunities for solitude would be minor and localized. The minimum amount of pack and saddle stock commercial services necessary for realizing the recreational purposes of the areas would be provided.	Wilderness character would be protected since impacts to opportunities for solitude would be minor and localized. Pack and saddle stock commercial services would be provided, but for less than the minimum amount necessary for realizing the recreational purposes of the areas.	

Purpose and Need	Unit of Measure	Alternative 1	Alternative 2 (current condition)	Alternative 3
3. Make standards and guidelines for campsite barren core (see Glossary) in wilderness compatible with party size for pack and saddle stock outfitter-guides.	Qualitative discussion	Forest Plans would not be amended, but there would be no pack and saddle stock outfitter-guide activities.	Forest Plan amendment would allow up to 5,250 square feet of barren core in existing camps that exceed that size. In established campsites, barren core would not be allowed to increase.	Forest Plan amendment would allow up to 2,800 square feet of barren core in existing camps that exceed that size. In established campsites, barren core would not be allowed to increase. Party size for pack and saddle stock outfitter-guides would be 12 heartbeats.

Key Issue	Unit of Measure	Alternative 1	Alternative 2	Alternative 3
1. Current and proposed pack and saddle outfitted use does not comply with some Forest Plan wilderness standards and guidelines or with the Wilderness Act because the party size and amount of use perpetuates large camps and degrades the condition of the wilderness.				

Key Issue	Unit of Measure	Alternative 1	Alternative 2	Alternative 3
<p>a) Compliance with the Wilderness Act in terms of the qualities that make up wilderness character: untrammeled, undeveloped, natural, and opportunities for solitude or primitive and unconfined recreation.</p>	<p>Qualitative discussion</p>	<p>Pack and saddle stock outfitter-guides would not operate in wilderness. There would be a 5% reduction in the number of pack and saddle stock users in the Pasayten and a 3% reduction in the Lake Chelan-Sawtooth. The untrammeled and undeveloped qualities of wilderness character would be unaffected. There would be minor, localized beneficial impacts to the natural quality since fewer pack and saddle stock would be grazing, and potentially damaging stream banks at watering sites. Opportunities for solitude would also be beneficially impacted on a local, minor level with the reduced number of pack and saddle stock users.</p>	<p>There would be approximately 7% more pack and saddle stock users in the Pasayten, and 1% more in the Lake Chelan-Sawtooth compared to current numbers. The untrammeled and undeveloped qualities would be unaffected. The natural quality of the Pasayten and Lake Chelan-Sawtooth wilderness areas could receive minor, localized impacts due to the increase in the number of pack and saddle stock service days. Opportunities for solitude would have minor, localized, negative impacts due to the increase in pack and saddle stock users.</p>	<p>There would be a 1% increase in the number of pack and saddle stock users in the Pasayten, and a 1% decrease in the Lake Chelan-Sawtooth, so this alternative would result in not noticeable change from the existing condition. The untrammeled and undeveloped qualities would be unaffected. The natural quality would continue to have minor, localized impacts from stock grazing, and damage to stream banks at watering spots. Opportunities for solitude would negatively impacted, but these impacts would be localized and minor.</p>

Key Issue	Unit of Measure	Alternative 1	Alternative 2	Alternative 3
b)Compliance with Wilderness Management Tool (non-degradation policy)	Qualitative discussion	The elimination of pack and saddle stock outfitter-guides would reduce use at some existing sites, and lead to some natural restoration of barren core areas not used by the non-outfitted pack and saddle stock parties.	Forest Plan amendments would limit the amount of barren core outfitters can use, allowing natural restoration to occur in camps with existing barren cores exceeding 5,250 square feet. Mitigation measures would insure that outfitter-guides do not further degrade the condition of the wilderness.	Forest Plan amendments would limit the amount of barren core outfitters can use, allowing natural restoration to occur in camps with existing barren cores exceeding 2,800 square feet. Mitigation measures would insure that outfitter-guides do not further degrade the condition of the wilderness.
c) Compliance with standards and guidelines, and the effect the proposed Forest Plan amendment will have on wilderness character	Qualitative discussion	No permits would be issued for pack and saddle stock outfitter-guides, so compliance with standards and guidelines would be not applicable.	Outfitter-guide activities would comply with amended standards and guidelines. The Forest Plan amendment would have minor, localized impacts on the opportunities for solitude by authorizing larger areas of barren core in outfitter camps. The outfitters will be prohibited from creating new camps, or increasing the size of existing barren cores, so the result will be a slight decrease in the amount of barren core at large, established camps.	Outfitter-guide activities would comply with amended standards and guidelines. The Forest Plan amendment would have minor, localized impacts on the opportunities for solitude by authorizing larger areas of barren core in outfitter camps. The outfitters will be prohibited from creating new camps, or increasing the size of existing barren cores, so the result will a larger decrease in the amount of barren core at large, established camps, compared to Alternative 2..
d)Total Number of Visitor Days in Wilderness(outfitted and private) and percent outfitted	Visitor Days Percent Outfitted	107,582 Visitor Days 0% outfitted	110,302 Visitor Days 2% outfitted	108,902 Visitor Days 1% outfitted

Key Issue	Unit of Measure	Alternative 1	Alternative 2	Alternative 3
e) Total Number of Pack and Saddle Stock Visitor Days in Wilderness (outfitted and private) and percent outfitted	Visitor Days Percent Outfitted	34,146 Pack & Saddle Visitor Days 0% outfitted	36,866 Pack & Saddle Visitor Days 7% outfitted	35,466 Pack & Saddle Visitor Days 4% outfitted
2. Current outfitted use could degrade wetlands and habitat for native plant species.				
a) wetland within 500 feet of pack and saddle stock camps, and percentage of total wetlands in analysis area	Estimated number of acres and percent of total	117.2 1.4%	117.2 1.4%	117.2 1.4%
b) effects of activities on wetlands	Qualitative discussion	6% reduction in pack and saddle stock would reduce localized impacts of grazing and trampling of vegetation in and around campsites. The damage to vegetation would continue to be isolated in context of all the wetlands in the analysis area.	Localized impacts to the 117.2 acres of wetlands would continue, but mitigation measures would minimize impacts from outfitter-guides. Outfitter-guide activities would meet the Aquatic Conservation Strategy Objectives, and the Riparian Management Objectives, so isolated impacts to wetlands would be within standards.	Localized impacts to the 117.2 acres of wetlands would continue, but mitigation measures would minimize impacts from outfitter-guides. Outfitter-guide activities would meet the Aquatic Conservation Strategy Objectives, and the Riparian Management Objectives, so isolated impacts to wetlands would be within standards.
c) Determination Statements for threatened endangered and sensitive plant species	Determination rating	"No effect" on any listed plant species. "No impact" on any sensitive plant species.	"No effect" on any listed plant species. "May impact individuals, but not likely to cause a trend toward Federal listing or a loss of population viability" on sensitive species.	"No effect" on any listed plant species. "May impact individuals, but not likely to cause a trend toward Federal listing or a loss of population viability" on sensitive species.

Key Issue	Unit of Measure	Alternative 1	Alternative 2	Alternative 3
<p>d) Effects of stock grazing on plant composition</p>	<p>Qualitative discussion</p>	<p>The number of pack and saddle stock Visitor Days would be reduced by 6%. Pack and saddle stock grazing in and around campsites would not result in further modification of plant succession due to the limited amount of area where the animals graze, and the small number of animals compared to past use.</p>	<p>Outfitter-guide pack and saddle stock grazing in and around campsites would not result in further modification of plant succession due to the limited amount of area where the animals graze, and the small number of animals compared to past use.</p>	<p>The number of pack and saddle stock Visitor Days would be reduced by 3%. Outfitter-guide pack and saddle stock grazing in and around campsites would not result in further modification of plant succession due to the limited amount of area where the animals graze, and the small number of animals compared to past use.</p>

Key Issue	Unit of Measure	Alternative 1	Alternative 2	Alternative 3
3. Current outfitted use could degrade some habitat for threatened, endangered or sensitive wildlife species through increased encounters with people or through habitat degradation.				
a) Determination Statements from Biological Assessment for threatened, endangered or sensitive wildlife species	Determination rating	“No Effect” on any listed species.	“May affect, not likely to adversely effect” gray wolf, grizzly bear, lynx, northern spotted owl. “No effect” on all other listed species. “May impact individuals, but not likely to cause a trend toward Federal listing or a loss of population viability” great gray owl. “No impact” on all other listed species.	“May affect, not likely to adversely effect” gray wolf, grizzly bear, lynx, northern spotted owl. “No effect” on all other listed species. “May impact individuals, but not likely to cause a trend toward Federal listing or a loss of population viability” great gray owl. “No impact” on all other listed species.

Key Issue	Unit of Measure	Alternative 1	Alternative 2	Alternative 3
4. Current pack and saddle stock outfitted use could degrade water quality and aquatic resources.				
a) Determination Statements from Biological Assessment for threatened and endangered fish species.	Determination rating	“No effect” on any listed species.	“Adverse effect” to bull trout. “May affect, not likely to adversely effect” steelhead, and spring Chinook. “No effect” on all other listed species.	“Adverse effect” to bull trout. “May affect, not likely to adversely effect” bull trout, steelhead, and spring Chinook. “No effect” on all other listed species.
b) Compliance with Northwest Forest Plan Aquatic Conservation Strategy (ACS) and PACFISH Riparian Management Objectives (RMO)	Qualitative discussion	Alternative would comply with the ACS and RMOs.	Alternative would comply with the ACS and RMOs.	Alternative would comply with the ACS and RMOs.
c) Compliance with state water quality standards and the Clean Water Act	Qualitative discussion	Alternative would comply with the Clean Water Act.	Alternative would comply with the Clean Water Act.	Alternative would comply with the Clean Water Act.
d) Effects of open grazing on riparian areas, streams and lakes	Qualitative discussion	Open grazing would disperse impacts, and minimize effects on riparian areas, streams, and lakes.	Open grazing would disperse impacts, and minimize effects on riparian areas, streams, and lakes.	Open grazing would disperse impacts, and minimize effects on riparian areas, streams, and lakes.

Key Issue	Unit of Measure	Alternative 1	Alternative 2	Alternative 3
e)Stream sedimentation from stock grazing.	Qualitative discussion	The increased stream sedimentation from stock grazing and use would be low. It would not be detectable compared to ongoing channel and hill slope erosion, except at the point of disturbance in the stream channel. There would be no detectable difference in stream sedimentation between alternatives across the analysis area. Stream turbidity is not expected to change under any of the alternatives, because the suspended sediment would not change.	The increased stream sedimentation from stock grazing and use would be low. It would not be detectable compared to ongoing channel and hill slope erosion, except at the point of disturbance in the stream channel. There would be no detectable difference in stream sedimentation between alternatives across the analysis area. Stream turbidity is not expected to change under any of the alternatives, because the suspended sediment would not change.	The increased stream sedimentation from stock grazing and use would be low. It would not be detectable compared to ongoing channel and hill slope erosion, except at the point of disturbance in the stream channel. There would be no detectable difference in stream sedimentation between alternatives across the analysis area. Stream turbidity is not expected to change under any of the alternatives, because the suspended sediment would not change.
f) Stream flow	Qualitative discussion	No changes would occur in stream flow.	No changes would occur in stream flow.	No changes would occur in stream flow.

Key Issue	Unit of Measure	Alternative 1	Alternative 2	Alternative 3
g) Localized impacts where trails cross streams or where camps are located near water	Qualitative discussion	6% reduction in the number of pack and saddle stock visitor days would reduce impacts. There would be localized impacts to stream banks and other water features, including damage to riparian vegetation and reduction in water quality. The isolated, localized impacts would not adversely affect riparian habitat conditions or water quality beyond the immediate areas.	There would be a 1% increase in the number of pack and saddle stock users, so conditions would not change from existing condition. There would be localized impacts to stream banks and other water features, including damage to riparian vegetation and reduction in water quality. The isolated, localized impacts would not adversely affect riparian habitat conditions or water quality beyond the immediate areas.	1% reduction in the number of pack and saddle stock visitor days would reduce impacts. There would be localized impacts to stream banks and other water features, including damage to riparian vegetation and reduction in water quality. The isolated, localized impacts would not adversely affect riparian habitat conditions or water quality beyond the immediate areas.
h. Fecal coliform levels	Qualitative discussion	No detectable change in fecal coliform levels in water bodies.	No detectable change in fecal coliform levels in water bodies.	No detectable change in fecal coliform levels in water bodies.

Other Issues	Unit of Measure	Alternative 1	Alternative 2	Alternative 3
<p>Pack and saddle stock outfitter-guides could introduce noxious weeds into currently weed-free areas, such as wilderness, in stock manure.</p>	<p>Qualitative discussion</p>	<p>There would be no outfitter-guide pack and saddle stock that could potentially introduce weeds. The requirement for certified weed-free hay at Wilderness trailheads beginning in 2007, and everywhere on National Forest System Land beginning in 2009 would substantially reduce the possibility of weeds being spread by non-outfitted pack and saddle stock users.</p>	<p>Outfitters would help identify and locate newly established weed populations, aiding in early treatment. The requirement for certified weed-free hay at Wilderness trailheads beginning in 2007, and everywhere on National Forest System Land beginning in 2009 would substantially reduce the possibility of weeds being spread by non-outfitted pack and saddle stock users.</p>	<p>Outfitters would help identify and locate newly established weed populations, aiding in early treatment. The requirement for certified weed-free hay at Wilderness trailheads beginning in 2007, and everywhere on National Forest System Land beginning in 2009 would substantially reduce the possibility of weeds being spread by non-outfitted pack and saddle stock users.</p>
<p>Pack and saddle stock outfitter-guides could degrade air quality with smoke from campfires.</p>	<p>Qualitative discussion</p>	<p>The Pasayten Wilderness is the only Class I airshed in analysis area. There would be no pack and saddle stock outfitter-guide campfires.</p>	<p>The Pasayten Wilderness is the only Class I Airshed in analysis area. It is unlikely that smoke from campfires would degrade air quality. Campfires are built with dry fuel, and burn rapidly, ventilating upwards. In addition, there would not be a large enough concentration of smoke given the dispersed location of campsites.</p>	<p>The Pasayten Wilderness is the only Class I Airshed in analysis area. It is unlikely that smoke from campfires would degrade air quality. Campfires are built with dry fuel, and burn rapidly, ventilating upwards. In addition, there would not be a large enough concentration of smoke given the dispersed location of campsites.</p>

Other Issues	Unit of Measure	Alternative 1	Alternative 2	Alternative 3
Firewood gathering by pack and saddle stock outfitter-guides could degrade the environment by removing down woody debris and limiting or eliminating this habitat component.	Qualitative discussion	Less than one tenth of one percent of the analysis area would be affected by firewood gathering. There would be some loss of habitat, but abundant habitat exists away from these isolated spots.	Less than one tenth of one percent of the analysis area would be affected by firewood gathering. There would be some loss of habitat, but abundant habitat exists away from these isolated spots.	Less than one tenth of one percent of the analysis area would be affected by firewood gathering. There would be some loss of habitat, but abundant habitat exists away from these isolated spots.
Reducing the number of service days allowed could lead to some existing pack and saddle stock outfitters going out of business because of reduced revenues.	Qualitative discussion	No pack and saddle stock outfitter-guide permits would be issued, so the existing companies would no longer be able to offer trips into the backcountry or wilderness. Most would likely go out of business.	The existing businesses, or suitable replacements, would be about to continue to operate.	The reduction in allowable service days and party size could force some business to close because of increased operating costs, and decreased opportunities to generate revenue.
Pack and saddle stock outfitter-guides could degrade the experience of other recreation users outside wilderness.	Qualitative discussion	There would be an approximate 1% reduction in the number of recreationists with this alternative. This reduction is small enough to likely go unnoticed by non-outfitted public.	Approximately 2% of the recreation use in the analysis area outside wilderness would be associated with outfitted pack and saddle stock use. Some conflict exists between outfitted and non-outfitted users, but the relatively small amount of outfitted use compared to non-outfitted use minimizes the frequency of conflict and contact.	Approximately 1% of the recreation use in the analysis area outside wilderness would be associated with outfitted pack and saddle stock use. Some conflict exists between outfitted and non-outfitted users, but the relatively small amount of outfitted use compared to non-outfitted use minimizes the frequency of conflict and contact.

Other Issues	Unit of Measure	Alternative 1	Alternative 2 (current condition)	Alternative 3
<p>Pack and saddle stock outfitter-guide activities could lead to soil damage and displacement in meadows and other areas by stock trampling, grazing, and crossing wet areas.</p>	<p>Qualitative discussion</p>	<p>Most existing detrimental soil damage occurred prior to implementation of the Forest Plans. Soil in and around campsites, at stock watering areas, and trail crossings would continue to be damaged by non-outfitted pack and saddle stock. There would be approximately 6% fewer pack and saddle stock on the analysis area with this alternative, but the existing areas of damage would continue to be used by non-outfitted pack and saddle stock, so the amount of area with damaged soil would likely not change. The vast majority of the analysis area is completely unaffected by recreation activities, so the isolated areas of soil damage are not resulting in unacceptable amounts of detrimental soil damage.</p>	<p>Most existing detrimental soil damage occurred prior to implementation of the Forest Plans. Soil in and around campsites, at stock watering areas, and trail crossings would continue to be damaged by non-outfitted pack and saddle stock. The existing areas of damage would continue to be used by outfitted and non-outfitted pack and saddle stock, so the amount of area with damaged soil would likely not change. The vast majority of the analysis area is completely unaffected by recreation activities, so the isolated areas of soil damage are not resulting in unacceptable amounts of detrimental soil damage.</p>	<p>Most existing detrimental soil damage occurred prior to implementation of the Forest Plans. Soil in and around campsites, at stock watering areas, and trail crossings would continue to be damaged by non-outfitted pack and saddle stock. The existing areas of damage would continue to be used by outfitted and non-outfitted pack and saddle stock, so the amount of area with damaged soil would likely not change. The vast majority of the analysis area is completely unaffected by recreation activities, so the isolated areas of soil damage are not resulting in unacceptable amounts of detrimental soil damage.</p>

Other Issues	Unit of Measure	Alternative 1	Alternative 2 (current condition)	Alternative 3
<p>Pack and saddle stock outfitter-guide grazing could exceed Forest Plan standards and guidelines pertaining to forage utilization.</p>	<p>Qualitative discussion</p>	<p>There would be no outfitter-guide stock forage use with this alternative. Non-outfitted stock would continue to graze around campsites. Stock forage utilization would be well within allowable use standards and consistent with all standards and guidelines. There would continue to be localized areas of concentrated use associated with camps. With the closing of the wilderness livestock permits, forage use and resource impacts are still very far below the use and impacts under the old grazing allotment stocking rates.</p>	<p>Outfitter-guide stock forage utilization would be well within allowable use standards and consistent with all standards and guidelines. There would be localized areas of concentrated use associated with camps. With the closing of the wilderness livestock permits, even with outfitter-guide grazing, the forage use and resource impacts are still very far below the use and impacts under the old grazing allotment stocking rates.</p>	<p>Outfitter-guide stock forage utilization would be well within allowable use standards and consistent with all standards and guidelines. There would be localized areas of concentrated use associated with camps. With the closing of the wilderness livestock permits, even with outfitter-guide grazing, the forage use and resource impacts are still very far below the use and impacts under the old grazing allotment stocking rates.</p>