

CHAPTER 1

Purpose and Need

Changes Between Draft and Final Environment Impact Statement

- Revised the Purpose and Need to add a Forest Plan Amendment addressing campsites within 200 feet of meadows, streams, lakes, and key interest areas.
- Incorporated information from revised 2012 Needs Assessment.
- Revised the Proposed Action to add a Forest Plan amendment to MA15B-21L to allow the pack and saddle stock outfitter-guides to use existing campsites within 200 feet of meadows, streams, lakes, and key interest areas.
- Updated the Public Involvement section to add information about release and review of the Draft EIS.
- As a result of comments on the DEIS, added a Significant Issue pertaining to the number of service days and barren core limitations in Alternative 2.
- As a result of comments on the DEIS, added an Other Issue pertaining to the economic impact of the pack and saddle stock outfitter-guides.
- Made numerous minor editorial and spelling corrections.

Purpose and Need

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 to 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 3% of the overall outfitted and non-outfitted visitor days (defined as one person for one day) across the analysis area, and approximately 15% of all pack and saddle stock use. The analysis area is shown on **Map 1-1 in the Map Section** of this document.

Document Organization

The Forest Service has prepared this Final Environmental Impact Statement (FEIS) in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal and State laws and regulations. A Draft EIS was published for a 45 day public and agency comment period on August 31, 2010. The comment period was extended until November 22, 2010. This FEIS discloses the direct, indirect, and cumulative environmental effects that would result from implementing the proposed action and alternatives to the proposed action. The Record of Decision, which is the decision document associated with this FEIS, is a separate document based on this FEIS.

This document contains the following:

- **Chapter 1. Purpose and Need for Action:** Provides information on the background of the proposal, the planning framework that guides management of this portion of the National Forest, the purpose and need for the project, and the agency proposal (Proposed Action) for achieving that purpose and need. This chapter also details how the Forest Service informed the public of the proposal and how the public responded. Finally, this chapter lists issues developed in response to the proposed action.
- **Chapter 2. Alternatives, including the Proposed Action:** A detailed description of the proposed action as well as alternative methods for achieving the purpose and need. The alternatives were developed based on significant issues raised by the public. Mitigation

measures and monitoring are also detailed. Finally, this chapter provides a summary table which compares the components and environmental consequences associated with each alternative.

- **Chapter 3. Affected Environment and Environmental Consequences:** Description of the affected environment of area resources and the environmental effects of implementing the proposed action and alternatives described in Chapter 2. Relevant direction from National Forest Land and Resource Management Plans and applicable laws and regulations are also detailed.
- **Chapter 4. List of Preparers:** List of individuals who helped prepare the document
- **Chapter 5 Consultation and Coordination:** List of agencies, organizations, and persons to whom copies of the document were sent.
- **Map Section:** Includes 11 inch by 17 inch copies of the maps referenced throughout the document.
- **Glossary:** Definitions of terms used in the document.
- **Literature Citations:** List of citations used in the document.
- **Index:** List of key words and page numbers.
- **Appendices:** Provide more detailed information to support the analysis presented in the FEIS.

ANALYSIS AREA

The analysis area is located on the Okanogan-Wenatchee National Forest and a portion of the Mt. Baker-Snoqualmie National Forest administered by the Okanogan-Wenatchee. The existing outfitter-guide permits include the entire analysis area. Most of the analysis area is on the Methow Valley Ranger District with some overlap on the Tonasket and Chelan Ranger Districts. It includes the Pasayten and Lake Chelan-Sawtooth Wilderness Areas, the North Cascades, Sawtooth Backcountry, the Bear/Ramsey/Volstead area, Alta Lake, and some National Forest System land adjacent to these areas. The analysis area has been divided into seven smaller areas in order to track activities and environmental effects in this analysis:

- Pasayten Wilderness
- Lake Chelan-Sawtooth Wilderness
- North Cascades
- Sawtooth Backcountry
- Bear/Ramsey/Volstead Area
- Middle Methow
- Alta Lake

Map 1-2 shows the analysis area and **Map 1-3** shows the individual sub units. Both are located in the **Map Section** of this document. Large scale maps are located in the analysis file. The following figure shows the number of acres by area, Forest Service Ranger District, and acres in the analysis area.

Figure 1-1: Analysis Area Acreage

Sub-Area	District	Analysis Acres
Pasayten Wilderness	Methow Valley and Tonasket	531,541
Lake Chelan-Sawtooth Wilderness	Methow Valley and Chelan	153,129
North Cascades	Methow Valley	270,435
Sawtooth Backcountry	Methow Valley and Chelan	35,149
Bear/Ramsey/Volstead	Methow Valley	58,114
Middle Methow	Methow Valley	50,550
Alta Lake	Methow Valley (administered by the Chelan District)	3,958
Total		1,102,876

Pasayten Wilderness

The 531,541 acre Pasayten Wilderness spans parts of both the Methow Valley and Tonasket Ranger Districts. The trailheads that access wilderness from the Tonasket District are Irongate, Chewuch, Long Swamp, and Fourteen Mile. On the Methow Valley Ranger District, trails from the Thirtymile, Andrews, Lake Creek, Crystal Lake, Falls Creek, and Billy Goat trailheads lead into the Pasayten from the Chewuch Watershed. From the Harts Pass area, trails from the Robinson Creek, Monument Creek, Buckskin Ridge, Harts Pass, West Fork Pasayten, and Pacific Crest Trail North trailheads lead into the Pasayten. Another trail leaving the Canyon Creek trailhead on Washington State Highway 20 (SH 20) leads to the western edge of the Pasayten.

Lake Chelan-Sawtooth Wilderness

The Lake Chelan-Sawtooth Wilderness is divided between the Methow Valley and Chelan Ranger Districts, and covers 153,129 acres. On the Methow Valley Ranger District, the Wolf Creek, Slate Creek, Scatter Creek, Gilbert, South Creek, Reynolds Creek, Williams Lake, War Creek, Eagle Creek, West Fork Buttermilk, East Fork Buttermilk, Scaffold Ridge, and Libby Lake trailheads provide access. On the Chelan Ranger District, the Fish Creek and Prince Creek trailheads provide access ; these are along the shores of Lake Chelan and accessible only by boat. There is a pack and saddle stock outfitter-guide camp at Fish Creek just outside the wilderness boundary.

North Cascades

The North Cascades portion of the analysis area includes the area outside wilderness and north of Wolf Creek. There are five major recreation areas in the North Cascades portion of the analysis area.

- The North Cascades Scenic Highway (Washington State Route 20) passes through the Methow Valley Ranger District for about 40 miles. It is a major travel route between the Methow Valley and northern portion of the greater Seattle area during the non-snowbound months, and is the most densely used recreation area in the analysis area. The Scenic Corridor includes the slopes on either side of the highway, bounded by the upper-most ridges as seen from the highway. The highway is not plowed in winter, and is typically open to wheeled vehicles from April 30 to December 1. The State Department of Transportation stops plowing the highway around the first of December; it usually reopens in time for the opening day of fishing season at the end of April. This varies from year to year depending on the weather and snowpack.

- The Cedar Creek/Early Winters area is along the North Cascades Scenic Highway. The Cedar Creek Trail, and trails and roads around the Early Winters Campground and the nearby Freestone Inn receive the most use.
- The West Fork Methow area is directly north of the Scenic Corridor. The West Fork Methow trail is popular for hikers, mountain bikers, and horseback riders. It begins at the Rattlesnake Trailhead northwest of Mazama, and intersects with the Pacific Crest Trail about nine miles from the trailhead. The Pacific Crest Trail passes through the middle of this area.
- Harts Pass is one of the most popular and frequently visited areas on the Methow Valley Ranger District. Over half of the people who visit Harts Pass are driving for pleasure; hiking is also a popular activity. There are two trailheads that access the Pacific Crest Trail and a trail to the Slate Peak Lookout, in addition to trails that lead into the Pasayten Wilderness.
- The Goat Creek area is located northeast of the Methow River. The most popular recreation destination in this area is Goat Peak Lookout located at the end of a 2½ mile non-motorized trail. There are no other trails or trailheads in the area.

This area also includes a narrow band of land adjacent to the Pasayten Wilderness in the Chewuch watershed. The Andrews Creek, Lake Creek, Thirtymile, and Billygoat trailheads are located in this area; all are within two miles of the wilderness boundary. Most use at these trailheads enters wilderness. There are assigned corrals at the Billygoat and Andrews Creek trailheads.

Sawtooth Backcountry

The Sawtooth Backcountry is adjacent to the Lake Chelan-Sawtooth Wilderness and is split between the Methow Valley and Chelan Ranger Districts. It includes 35,149 acres and several high-elevation lakes. There is a mix of motorized and non-motorized trail use originating at the Crater Creek and Foggy Dew trailheads on the Methow Valley District, and the South Navarre and Safety Harbor trailheads on the Chelan District. The Summer Blossom trailhead on the Chelan District allows only hiker use.

Bear/Ramsey/Volstead

The Bear/Ramsey/Volstead area is located east of the Methow River. There are no developed trailheads or maintained trails in this area, and recreation is based around the road system. This area receives most of the use during mule deer general firearm season in October.

Middle Methow

The Middle Methow portion of the analysis area includes the area east of the Lake Chelan-Sawtooth Wilderness and east of the Sawtooth Backcountry. There are two major recreation areas in the Middle Methow portion of the analysis area.

- The Twisp River corridor is bounded by the Lake Chelan-Sawtooth Wilderness on the north, west, and south sides. Most trails that begin at trailheads in the corridor enter wilderness within about one mile. The Twisp River horse camp is a popular campground specifically designed for people with horses and mules. This area also includes several campgrounds and the Twisp River trail, which follows the Twisp River from War Creek Campground to Gilbert trailhead. There is an assigned base camp¹ at the Slate Creek trailhead.

¹ An assigned base camp is a Permanent camps near trailheads where outfitter-guides can keep stock, meet clients and base operations. Base camps have corrals and other facilities for stock handling and care, in addition to parking areas for clients and employees.

- The Libby Creek and Gold Creek areas are located east of the Lake Chelan-Sawtooth Wilderness and the Sawtooth Backcountry. The Libby Creek trail begins in the Middle Methow and enters wilderness two miles from the trailhead. The Crater Creek and the Foggy Dew trailheads are located in this area; both trails enter the Sawtooth Backcountry less than a mile from the trailheads. There is an assigned base camp located near the Crater Creek trailhead.

Alta Lake

The Alta Lake portion of the analysis area includes the National Forest System (NFS) land around Alta Lake. Adjacent lands include Alta Lake State Park located on the north shore of the lake. The remainder of the shoreline is about 50% privately owned and 50% NFS land. There are no trailheads or campgrounds on NFS land in the area. The privately-owned Whisperin' Pine campground is located at the southwest end of the lake. There are loop trails around the lake and to areas south of the lake. About 50% of these trails are on NFS land. The county road leading to private properties at the end of the lake crosses over one-quarter mile of NFS land.

Outfitter-Guide Background

The first special use permits for outfitting and guiding with pack and saddle stock were issued in the 1950s and 1960s. Since then, the number of companies operating and the number of service days used has fluctuated, but there has been a consistent, active group of pack and saddle stock outfitter-guide over the 50 years.

Service Days

Outfitter-guide special use permits specify a number of service days. A service day is defined as a day, or part of a day on National Forest System lands for which an outfitter-guide provides goods or services, including transportation, to one client. When a permit is issued, the number of assigned service days is the highest number of service days an outfitter-guide reported over the previous five years. There are currently 4,460 service days divided between the outfitters, with a portion held in a pool to be assigned as needed to help the outfitters respond to increases in demand. Two of the current outfitters offer day rides in the North Cascades and Alta Lake sub-areas. All other service days are for overnight camping. The days are spread across the analysis area as shown in the following figure.

Figure 1-2. Current Service Days by Sub-area

Sub-area	Assigned Service Days	Pool Service Days	Total Service Days
Pasayten Wilderness	1,548	252	1,800
Lake Chelan-Sawtooth Wilderness	539	176	715
North Cascades	143	25	168
North Cascades (day rides)	355	250	605
Sawtooth Backcountry	250	144	394
Bear/Ramsey/Volstead	11	37	48
Middle Methow			
Alta Lake (day rides)	585	145	720
TOTAL	3,431	1,029	4,460

Campsites

The outfitter-guides are allowed to use any established campsite across the permit area (analysis area), with the exception of within the Lake Chelan-Sawtooth Wilderness, where they are restricted to using designated campsites. There are five camps in the Pasayten Wilderness – Bald Mountain, Beaver Creek, Sheep Mountain, Crow Lake, and Whistler camp – that are assigned sites. These campsites are designated and authorized for occupancy and use by a specific outfitter, and closed to use by the general public. The outfitter pays an additional fee for each site, and is allowed to leave camping equipment and supplies in camp for the entire season. All equipment and supplies must be removed at the end of the season. For all other campsites, all equipment and supplies must be removed at the end of each trip.

There are also four established base camps; one at the Andrews Creek Trailhead, another at the Crater Creek Trailhead, the third at the Slate Lake Trailhead, and the fourth at Fish Creek. There are permanent camps where outfitter-guides can keep stock, meet clients and base operations. Base camps have corrals and other facilities for stock handling and care, in addition to parking areas for clients and employees.

Appendix A lists all the campsites regularly used by the outfitters. They use other camps periodically, but tend to return to the same camps year after year. The outfitters can use any established campsite within their permit area on the Methow Valley and Tonasket Ranger Districts, and are restricted to using designated campsites on the Chelan District.

Current Outfitters

The current pack and saddle stock outfitter-guides are described below.

Cascade Corrals has been operating under a special use permit since 1950. The current permit is for 209 service days in the Lake Chelan-Sawtooth Wilderness and Sawtooth Backcountry.

Cascade Wilderness Outfitters has been operating under a special use permit since 1960. The current permit is for 621 service days in the Pasayten Wilderness, Lake Chelan-Sawtooth Wilderness, Sawtooth Backcountry, and North Cascade sub-areas.

Deli Llama Wilderness Adventures has been operating under a special use permit for llama outfitting and guiding since 1993. The current permit is for 151 service days in the Pasayten Wilderness and North Cascades sub-areas.

Early Winters Outfitting has been operating under a special use permit since 1983. The current permit is for 537 service days in the Pasayten Wilderness, North Cascades, and Bear/Ramsey/Volstead sub-areas. The permit also includes an additional 355 service days for day-rides in the North Cascades area. Day rides leave from the permittee's property, the Early Winters Ranch, continue on National Forest System land, and end back at the ranch.

North Cascade Outfitters has been operating under a special use permit since 1980. The current permit is for 200 service days in the Pasayten Wilderness and North Cascades sub-areas.

North Cascade Safaris has been operating under a special use permit since 1970. The current permit is for 431 service days in the Pasayten Wilderness, Lake Chelan-Sawtooth Wilderness, Sawtooth Backcountry, and North Cascades sub-areas.

Sawtooth Outfitters has operated under a special use permit since 1982. The current permit includes 343 service days in the Pasayten Wilderness, Lake Chelan-Sawtooth Wilderness, and Sawtooth Backcountry sub-areas. The permit also includes an additional 585 service days for day-rides in the Alta Lake area. Day rides leave from the permittee's property, the Whistlin' Pine Ranch, continue on National Forest System land, and end at the ranch.

Description of Trip Types

Pack and saddle stock outfitter-guides offer clients a variety of trip types to meet needs, expectations, and budgets. They are permitted to use established campsites throughout the analysis area. There are five assigned sites in the Pasayten Wilderness: Bald Mountain, Sheep Mountain, Beaver Creek, Crow Lake, and Whistler. These campsites are assigned to specific outfitter-guides, who pay additional charges for exclusive use of the camps. The outfitters are allowed to set up camps in these locations, and leave the equipment in place for an entire season. There are also four base camps outside wilderness: Andrews Creek, Billygoat, Slate Creek, and Crater Creek. These are also assigned to specific outfitters, and are used as staging areas near trailheads where clients meet with the outfitter and leave from their trips.

The types of trips offered are:

- Full-service Pack Trips: Guided horseback riding trips with meals, cook, and most or all camping gear provided. Trips may be progressive or base camp type. Progressive trips have a series of camps during the trip, while base camp trips stay at one camp for the entire trip and take day rides to local attractions. Trips vary from 2 to 10 days or more.
- Standard Pack Trip: Same as full-service, except clients provide and prepare their own food.
- Full-service Hiking Trips: Guided trips with meals, cook, and most or all camping gear. The trips may be progressive or base camp type; clients hike; food and gear is packed
- Standard Hiking Trips: Same as full-service hiking except clients provide and prepare their own food.
- Drop Camps: Clients and gear are transported to a location and dropped off. The outfitter returns for pick-up on a prearranged day. No guiding services are provided. Most drop camps occur during high and general hunting seasons.
- Re-supply/Supply Trips: Outfitter transports only supplies to a prearranged location.
- Day Rides/Hike: Horseback riding or hiking with pack support for a portion of one day with no overnight use. Day rides range from ½ hour to all day, with the majority lasting one hour.

Loose Grazing and Stock Containment

The outfitter-guides use two methods of caring for stock on overnight trips into wilderness and the backcountry: stock containment and loose grazing. Stock containment refers to tying stock to trees for short durations, tying to hitch rails or highlines, picketing stock, or holding them in a corral. Loose grazing is a technique where the stock are let loose to graze.

Stock confinement methods currently used include hitch rails, corrals, highlines, and pickets. Hitch rails are installed at the Sheep Mountain and Bald Mountain assigned sites. They consist of wooden side posts and a wooden top rail. There is also a corral at Sheep Mountain, constructed with wooden posts and rails. Highlines or lowlines are used at most camps. They are made by tying a rope between two trees, then tying the stock to the rope. Some outfitters occasionally use pickets to anchor stock to one spot to graze, then move the stock to a highline after feeding.

Confined stock must be taken to a grazing area and watering spot, then returned. Processed weed-free feed is often brought for stock that are confined, and to areas where adequate graze is not available near the campsite.

Loose grazing is often the method used by outfitters in camps they frequent often, such as the assigned sites. The outfitter identifies areas with sufficient graze, typically within one to two miles of camp depending on the location of the camp. These areas are carefully selected to move stock well away from other campsites and private stock. The stock are led to the grazing area, or travel there on their own, and left for the night. Bells are often placed on one or two of the stock to help the outfitter locate them if they do not return to camp on their own. Some outfitters hobble selected stock to help confine movement and facilitate catching, although stock can still travel very well with hobbles. In some camps, the stock are led back to camp in the mornings. In others, the stock is trained to return in the morning on their own. One to two horses are usually kept contained near the camp at night, to facilitate catching horses in the morning if needed.

Regulatory Framework

APPLICABLE LAWS AND EXECUTIVE ORDERS

The following laws and executive orders, with implementing regulations as appropriate, apply to the analysis and implementation of the outfitter-guide special use permit issuance. Those most relevant to impacts associated with this project are:

Wilderness Act of September 3, 1964

The Wilderness Act established a National Wilderness Preservation System to be composed of federally owned areas designated by Congress as "wilderness areas" and administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as Wilderness. The Act provides for the protection of these areas, the preservation of wilderness character, and for the gathering and dissemination of information regarding use and enjoyment as wilderness.

The Wilderness Act defines wilderness as:

...an area where the earth and community of life are untrammelled by man, where man himself is a visitor who does not remain.

The Act goes on to state that wilderness is protected and managed:

...so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially

unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation. Section 1 (c)

The role of the Forest Service, as directed by the Act, is to:

...be responsible for preserving the wilderness character of the area...wilderness areas shall be devoted to the public purposes or recreational, scenic, scientific, educational, conservation, and historical use. Section 4 (b)

The Act states that “there shall be no commercial enterprise” within wilderness areas.

However, the Act includes the following special provision:

Commercial services may be performed within the wilderness areas designated by the Act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas. Section 4 (d)(6)

The Pasayten was designated as a wilderness by Public Law 90-544, dated October 2, 1968. Additional area was added to the Pasayten and the Lake Chelan-Sawtooth was designated by Public Law 98-339, dated July 3, 1984.

For this analysis, use of the word ‘wilderness’ refers to Congressionally-designated land as part of the National Wilderness Preservation System.

National Environmental Policy Act (NEPA) of January 1, 1970

The Act directs all federal agencies to consider and report the potential environmental impacts of proposed federal actions and established the Council on Environmental Quality. The Council on Environmental Quality implementing regulations at 40 CFR Parts 1500-1508 and Forest Service implementing policy and procedures implementing regulations at 36 CFR 220 establish the basic process for conducting and documenting environmental analyses, including public participation. Under this law and these regulations, before a decision to authorize outfitter-guide permit issuance is made, the site-specific impacts of outfitter-guide use must be assessed.

National Forest Management Act of October 22, 1976 (as amended)

The National Forest Management Act reorganized, expanded, and otherwise amended the Forest and Rangeland Renewable Resources Planning Act of 1974, which called for the management of renewable resources on National Forest System lands. The National Forest Management Act of 1976 (NFMA) requires each National Forest unit to have a land and resource management plan (LRMP). Section 6(i) of NFMA [16 USC 1604(i)] requires that resource plans for the use of National Forest System lands must be consistent with the LRMP for the National Forest unit on which that use occurs. NFMA requirements are carried out through implementation of the Forest Land and Resource Management Plans. This analysis is guided by the Okanogan National Forest Land and Resource Management Plan (1989) and Wenatchee National Forest Land and Resource Management Plan (1990).

Clean Water Act (CWA) of 1977 and 1982 (as amended)

This Act places primary responsibility for protecting water quality with the States. Section 313 of the Act (33 USC 1323) requires Federal agencies to comply with all substantive and procedural State water quality requirements to the same extent as a non-governmental entity. This Act establishes a non-degradation policy for all federally proposed projects.

Endangered Species Act (ESA) of 1973 (as amended)

This Act requires the Forest Service to manage for the recovery of endangered and threatened species and the ecosystems on which they depend. Implementing regulations are found in 50 CFR Part 402. The policy and process for Forest Service compliance with the ESA are found in Forest Service Manual 2670.31. Section 7 of the ESA requires consultation with the Fish and Wildlife Service (FWS) and the National Marine Fisheries Service (NMFS) on Federal projects that may affect listed species.

National Historic Preservation Act of 1966 (as amended)

This Act requires Federal agencies to consult with American Indian Tribes and the State, and local groups regarding non-renewable cultural resources, such as archaeological and historic structures. Section 106 of the Act requires Federal agencies to review the effects project proposals may have on cultural resources in the analysis area.

Executive Order 13112 (invasive species)

This 1999 order requires Federal agencies whose actions may affect the status of invasive species to identify those actions and within budgetary limits, “(i) prevent the introduction of invasive species; (ii) detect and respond rapidly to and control populations of such species... (iii) Monitor invasive species populations... (iv) provide for restoration of native species and habitat conditions in ecosystems that have been invaded;...(vi) promote public education on invasive species... and (3) not authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction of spread of invasive species...unless, pursuant to guidelines that it has prescribed, the agency had determined and made public... that the benefits of such actions clearly outweigh the potential harm caused by invasive species; and that all feasible and prudent measures to minimize risk of harm will be taken in conjunction with the actions.

Other applicable laws and regulations include:

Clean Air Act of August 7, 1977, as amended in 1990
American Antiquities Act of 1906
Bald and Golden Eagle Protection Act of 1940 (as amended)
Migratory Bird Treaty Act of 1918
Federal Noxious Weed Control Act of 1974 (as amended)
American Indian Religious Freedom Act of 1978
Archeological Resource Protection Act of 1980
Native American Graves Protection and Repatriation Act of 1990
Executive Order 11593 (cultural resources)
Executive Order 11988 (floodplains)
Executive Order 11990 (wetlands)
Executive Order 12898 (environmental justice)
Executive Order 13007 (Indian sacred sites)
Executive Order 13175 (Coordination with Indian Tribal Governments)
Executive Order 13186 (migratory birds)

MANAGEMENT DIRECTION – LAND AND RESOURCE MANAGEMENT PLANS

Management direction for the analysis area has been established by the Okanogan and Wenatchee National Forests’ Land and Resource Management Plans.

This analysis and document are tiered to the *Okanogan National Forest Land and Resource Management Plan Final Environmental Impact Statement* (USDA Forest Service 1989a) and its accompanying *Land and Resource Management Plan* (Okanogan Forest Plan, USDA Forest Service 1989b), and the *Wenatchee National Forest Land and Resource Management Plan Final Environmental Impact Statement* (USDA Forest Service 1990a) and its accompanying *Land and Resource Management Plan* (Wenatchee Forest Plan, USDA Forest Service 1990b). Forest Plan standards and guidelines provide general direction for the administration of National Forest System land. Relevant standards and guidelines established by both Forest Plans for this project are listed below.

The Okanogan and Wenatchee Forest Plans have been amended by the following:

- *The Record of Decision for Amendments to Forest Service and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl* (Northwest Forest Plan, USDA and USDI 1994). Northwest Forest Plan allocations pertinent to the analysis area are identified below.
 - Key Watersheds: a system of large refugia comprising watersheds that serve as refugia that are “*crucial for maintaining and recovering habitat for at-risk stocks of anadromous salmonids and resident fish species*” (USDA and USDI 1994: B-18). Much of the area proposed for permit issuance is located in Northwest Forest Plan Key Watersheds. Watershed analyses are complete on all Key Watersheds in the analysis area as is required prior to management activities (USDA and USDI 1994: C-7).
 - Late-Successional Reserves (LSR): The objective of LSRs is to protect and enhance conditions of late-successional and old-growth forest ecosystems, which serve as habitat for late-successional and old-growth related species, including the northern spotted owl. Management assessments of LSRs within the analysis area have been completed as required before any habitat manipulation can occur (USDA and USDI 1994: C-11). Under the Northwest Forest Plan, special use permits in LSRs must meet the objectives of LSR management. (USDA and USDI 1994: C-19).
 - Riparian Reserves: administrative areas where conservation of aquatic or riparian-dependent terrestrial resources receives primary emphasis. Riparian Reserves overlay the underlying NWFP and original Forest Plan management direction on all streams and wetlands. The Northwest Forest Plan and Riparian Reserves are discussed in the Aquatic Section, beginning on page 3-9. Special use permits in riparian reserves must be adjusted, if needed, to eliminate adverse effects that retard or prevent the attainment of the Aquatic Conservation Strategy objectives (USDA and USDI 1994: C-37).
 - Congressionally Reserved: lands that have been reserved by act of Congress for specific land allocation purposes. The Pasayten Wilderness and Lake Chelan-Sawtooth Wilderness are within this allocation. Management of these lands follows the direction in the Wilderness Act (applicable legislation) since it provides more restrictive or greater benefits to late-successional forest related species (USDA and USDI 1994: ROD 6 and C-8).
 - Administratively Withdrawn: areas identified in current forest plans and include recreation and visual areas, back country, and other areas not scheduled for timber harvest. The portion of the North Cascades sub-area within the North Cascades Scenic Highway Corridor is included in this allocation. The standards and guidelines of the current forest plans apply where they are more restrictive or provide greater benefits to

- late-successional and old-growth forest related species (USDA and USDI 1994: ROD 7 and C-29).
- Matrix: areas not included in the five categories of designated areas described above. There are no standards and guidelines for Matrix pertaining to special use permits or recreation activities (USDA and USDI 1994: ROD 7 and C-39).
 - *Final Environmental Impact Statement for the Pacific Northwest Region Invasive Plant Program* (USDA Forest Service 2005a), which culminated in a Record of Decision that amended the Forest Plan by adding management direction relative to invasive plants. The Okanogan Forest Plan has also been amended by:
 - *The Decision Notice/Decision Record for the Interim Strategies for Managing Anadromous Fish-producing Watershed in Eastern Oregon and Washington, Idaho, and Portions of California*, (PACFISH, USDA and USDI 1995). PACFISH provides additional management direction in riparian areas (overlying original Forest Plan direction) east of the area covered by the Northwest Forest Plan, and requires that implementation of permits avoid effects that would retard or prevent attainment of the Riparian Management Objectives and avoid adverse effects on listed anadromous fish (USDA and USDI 1995: C-16). PACFISH also identifies Priority Watersheds and requires completion of watershed analyses with a process similar to that in the Northwest Forest Plan.
 - *The Revised continuation of Interim Management Direction Establishing Riparian, Ecosystem and Wildlife Standards for Timber Sales, Appendix B, Regional Forester's Forest Plan Amendment #2* (USDA Forest Service 1995a) commonly referred to as the Eastside Screens. The Eastside Screens only apply to timber sales and thus are not relevant to this analysis and will not be discussed further.
 - On December 17, 2009, the U.S. District Court for the Western District of Washington issued an order in *Conservation Northwest, et al. v. Sherman, et al.*, No. 08-1067-JCC (W.D. Wash.), granting Plaintiffs' motion for partial summary judgment and finding NEPA violations in the *Final Supplemental to the 2004 Supplemental Environmental Impact Statement to Remove or Modify the Survey and Manage Mitigation Measure Standards and Guidelines* (USDA and USDI, June 2007). In response, parties entered into settlement negotiations in April 2010, and the Court filed approval of the resulting Settlement Agreement on July 6, 2011. Projects that are within the range of the northern spotted owl are subject to the survey and management standards and guidelines in the 2001 ROD, as modified by the 2011 Settlement Agreement.

Forest-wide Standards and Guidelines

The Okanogan and Wenatchee National Forest Plans include Forest-wide standards and guidelines that apply to all areas within the analysis area, however only the Okanogan Forest Plan includes items that specifically pertain to outfitter-guide permits.

"Recreation services partnerships to provide recreation facilities and services shall be used where feasible." Forest-wide Standard and Guideline 8-2.

"Recreation special use authorizations shall conform to the goals of the MA." Forest-wide Standard and Guideline 8-11.

The Wenatchee Forest Plan recognizes that outfitter-guides provide valuable recreation opportunities for a segment of the public who do not have the expertise, equipment, or physical capabilities to enjoy these experiences on their own. The Plan states that permits should be issued when there is a demonstrated public need or demand for the service, when permitted use is compatible with general public use, and when use can occur without exceeding carrying capacities, causing unacceptable impacts, or causing changes that approach limits of acceptable change (USDA Forest Service 1990: E-11).

Forest Plan Direction for Each Area within the Analysis Area

Both Forest Plans describe management areas (MA) that have goals, desired future conditions, and standards and guidelines specific to the areas. Standards and guidelines relevant to individual resources are identified in each resource section of Chapter 3. The Pasayten and Lake-Chelan Sawtooth Wilderness Areas have their own wilderness management allocations. All of the analysis area sub-areas include either Riparian Reserves (the western portion of the analysis area covered by the Northwest Forest Plan) or Riparian Habitat Conservation Areas (the eastern portion of the analysis area covered by PACFISH), and most areas outside wilderness are in Late Successional Reserves. Each sub-area of the analysis area is addressed below.

Pasayten and Lake Chelan-Sawtooth Wilderness Areas

Much of the proposed permit areas are in the Pasayten and Lake Chelan-Sawtooth Wilderness Areas, and designated as Congressionally Reserved in the Northwest Forest Plan. Wilderness is designated MA 15A or MA 15B in the Okanogan Forest Plan, and Pristine, Primitive, Semi-Primitive, or Transition Wilderness Recreation Opportunity Spectrum Class in the Wenatchee Forest Plan. Pack and saddle stock outfitters are not allowed to operate in MA 15A or in the Pristine Spectrum Class areas in the Lake Chelan-Sawtooth Wilderness. **Map 1-4** and **Map 1-5 in the Map Section of this document** show wilderness management areas.

The goal of MA 15B is to maintain a predominately unmodified primitive environment within designated wilderness with a variety of trail opportunities. The standards and guidelines for this management area are located on pages 4-91 through 4-97 in the Okanogan Forest Plan. The desired future condition is:

"[a]n area with a minimum of on-site controls and restrictions, and where the presence of controls would be subtle. Facilities would only be provided for protection of wilderness resource values. Materials should be native where possible and in all cases would be natural appearing. The area would provide a high to moderate opportunity for exploring and experiencing isolation and solitude, independence, closeness to nature, tranquility, and self-reliance through the application of primitive skills in an environment that offers a high to moderate degree of challenge and risk." (USDA Forest Service 1989b: 4-91)

The standards and guidelines for Primitive Wilderness Recreation Opportunity Spectrum (WROS) are located on pages IV-71 and IV-72 in the Wenatchee Forest Plan. Primitive WROS Class is:

"[c]haracterized by an essentially un-modified, natural environment. Concentrations of visitors are low and evidence of human use is minimal. The area has high opportunity for isolation, solitude, exploration, risk, and challenge (USDA Forest Service 1990: IV-71).

The standards and guidelines for Semi-Primitive WROS are located on pages IV-73 and IV-74 in the Wenatchee Forest Plan. Semi-Primitive WROS Class is:

“[c]haracterized by a predominantly unmodified environment of at least moderate size. System trails and campsites are present and there is evidence of other uses. A minimum of on-site controls and restrictions are implemented to protect physical, biological, and social resources. Some facilities may be present to reduce visitor impact. (USDA Forest Service 1990: IV-73).

The standards and guidelines for Transition WROS are located on pages IV-75 and IV-76 in the Wenatchee Forest Plan. Transition WROS Class is:

[c]haracterized by a predominately unmodified environment, however, the concentrations of visitors may be moderate to high at various times. The area is characterized as having a large number of day users who are often mixed with overnight and long-distance travelers on trails near trailheads and wilderness boundaries.

North Cascades

This sub-area includes the North Cascades Scenic Corridor, the Harts Pass area, and the land in between.

The North Cascades Scenic Corridor is in MA 7 in the Okanogan Forest Plan. Standards and guidelines for this management area are located on pages 4-70 through 4-72 in the Okanogan Forest Plan. The desired future condition of this management area is:

“[t]he existing scenic values of the area would be preserved while allowing for moderate expansion of recreation facilities with an emphasis on day use and short duration stay opportunities....Easy Pass, Rainy Lake, Lake Ann, Blue Lake, and Washington Pass Trails shall be closed to horse use.” (USDA Forest Service 1989b: 4-70)

The remainder of this sub-area includes MAs 4, 5, 8, 10, 14, 17, 24, and 25 in the Okanogan Forest Plan. MAs 4 and 24 are managed for semi-primitive non-motorized recreation, MA 5 for recreation and scenery, MA 8 as a research natural area, MA 10 for mountain goats, MA 14 for deer winter range, MA 17 for developed recreation, and MA 25 for timber and range resources. The desired future conditions, and standards and guidelines for these management areas are described on pages 4-61, 4-65, 4-73, 4-76, 4-83, 4-98, 4-101, and 4-103, respectively. Portions of this sub-area lie within the Upper Methow Late-Successional Reserve under the Northwest Forest Plan. **Map 1-6 in the Map Section** of this document shows the North Cascades management areas.

Sawtooth Backcountry

The Sawtooth Backcountry is divided between the Methow Valley and Chelan Ranger Districts.

The Methow portion is in MA 4M of the Okanogan Forest Plan, which is managed for year-round semi-primitive motorized recreation. The standards and guidelines for this management area are located on pages 4-63 through 4-64 in the Okanogan Forest Plan. The desired future condition is:

“[r]ecreation opportunities would be provided in areas characterized by a predominately natural or naturally appearing environment. Users would have a

moderate probability of experiencing isolation from the sights and sounds of humans, independence, closeness to nature, tranquility, and self-reliance through the application of outdoor skills in an environment that offers challenge and risk. Concentrations of users would generally be low. Areas would be managed with subtle on site controls and restrictions.” (USDA Forest Service 1989b: 4-63)

The Chelan portion is in MA RE2a in the Wenatchee Forest Plan. The standards and guidelines for this management area can be found on pages IV-165 through IV-169. The goal for this management area is to:

[p]rovide dispersed, unroaded recreation in a semi-primitive motorized recreation opportunity setting (USDA Forest Service 1990: IV-165).

The description of the area is:

[t]his prescription is for application to unroaded areas in which trails are evident and maintained for...existing or potential trails for motorbikes, hikers and horseback riders (USDA Forest Service 1990: IV-165).

Portions of this sub-area are in the Sawtooth Late-Successional Reserve. **Map 1-7 in the Map Section** of this document shows the Sawtooth Backcountry management areas.

Bear/Ramsey/Volstead

The Bear/Ramsey/Volstead area is divided between MAs 14, 25, and 26 in the Okanogan Forest Plan. MAs 14 and 26 are managed primarily for deer winter range and MA 25 is managed primarily for timber and range resources. The desired future conditions, and standards and guidelines for these management areas are described on pages 4-83, 4-103, and 4-107, respectively. **Map 1-8 in the Map Section** of this document shows the Bear/Ramsey/Volstead management areas.

Middle Methow

The Middle Methow portion of the analysis area includes MAs 5, 8, 10, 14, 25, and 26 in the Okanogan Forest Plan. Management in these areas is described above. The desired future conditions, and standards and guidelines for these management areas are described on pages 4-65, 4-73, 4-76, 4-83, 4-103, and 4-107, respectively. Portions of this sub-area lie within the Twisp River and Sawtooth Late-Successional Reserves. **Map 1-9 in the Map Section** of this document shows the Middle Methow management areas.

Alta Lake

The Alta Lake portion includes MAs 5 and 14. Management of these areas is described above. These management areas are found in the Okanogan Forest Plan, beginning on pages 4-65 and 4-83, respectively. **Map 1-10 in the Map Section** of this document shows the Alta Lake management areas.

Other Policy, Guidance, and Analyses Considered and Incorporated by Reference

Forest Service Handbooks and Manuals

Forest Service Handbook 2709.11, Chapter 40, includes policy for administering permits for outfitting and guiding. The Forest Service Manual Chapter 2320.2 sets policy for wilderness management. Refer to these for detailed information.

Other policy and landscape-level assessments were utilized in the analysis. These include the following, which are incorporated into this EIS by reference.

An Assessment of the Northeastern Cascades Late-Successional Reserves (USDA Forest Service 1998a)

The LSR Assessment discusses the current condition, management implications and recommendations for late-successional reserves (LSR). The Twisp River, Upper Methow, and Sawtooth LSRs lie partially within the analysis area. Pack and saddle stock activities were not specifically addressed in these LSRs, although the Twisp River and Upper Methow were identified as LSRs with increasing levels of recreational use and made the recommendation to carefully consider effects of increasing use. The LSR Assessment was reviewed by the Regional Ecosystem Office (REO) and found to provide a sufficient framework and context for future projects. In a memorandum of April 7, 1998, REO provided an exemption of project-level REO review.

Grizzly Bear Core Habitat Policy

The Forest Supervisor developed a policy in the August 12, 1997 “Grizzly Bear Recovery – North Cascades Ecosystem” letter (USDA Forest Service 1997b), signed jointly by Forest Supervisors for the Wenatchee, Okanogan, and Mt. Baker-Snoqualmie National Forests, requiring an interim standard of “no net loss of existing core habitat”. The interim standard will be updated during the Forest Plan Revision process currently underway on the Okanogan-Wenatchee National Forest. Grizzly bear core habitat was defined as the area greater than 0.3 miles from any motorized-access route or high-use non-motorized access route. The Grizzly Bear Core Habitat policy is incorporated by reference. The effects on this habitat are described in the Wildlife section of Chapter 3.

Watershed Analyses

Watershed analyses within Key and Priority Watersheds have been completed, as discussed in both the Northwest Forest Plan and PACFISH (USDA and USDI 1994 and 1995). Watershed analysis is a systematic procedure for evaluating the geomorphic and ecologic processes operating in a specific watershed. Watershed analysis serves as the basis for developing project-specific proposals and determining monitoring and restoration needs for a watershed. In all of the watershed analyses completed within the analysis area, information needed for making sound management decisions was collected and compiled. Pack and saddle stock or outfitter-guide activities were not identified as substantial uses affecting ecosystem function and were not discussed in depth in any of the analyses. Limited discussions of issues that may have a relationship to outfitter-guide use occur in the Upper Methow and Toats Coulee analyses and are discussed below. The following watershed analyses include areas within the analysis area:

Chewuch River Watershed Analysis (USDA Forest Service 1994)

The area generally west of the Chewuch River is a Key Watershed in the Northwest Forest Plan) and the area generally east of the Chewuch River is a Priority Watershed in PACFISH.

Early Winters Creek Watershed Analysis (USDA Forest Service 1996b)

Early Winters Creek is designated as a Key Watershed in the Northwest Forest Plan and contains a portion of the Upper Methow Late-Successional Reserve.

Toats Coulee Watershed Analysis (USDA Forest Service 1995b)

Toats Coulee is a Priority Watershed under PACFISH. Within the watershed analysis, pack animal damage to stream banks in certain places used to access water was identified as a riparian and aquatic habitat issue.

Twisp River Watershed Analysis (USDA Forest Service 1995c)

The Twisp River is designated as a Key Watershed in the Northwest Forest Plan and contains the Twisp River Late-Successional Reserve.

Middle Methow Watershed Assessment (USDA Forest Service 1997c)

The Middle Methow watershed is a Key Watershed under the Northwest Forest Plan and a Priority Watershed under PACFISH. It contains a portion of the Sawtooth Late-Successional Reserve.

Salmon Watershed Assessment (USDA Forest Service 1997d)

Salmon Creek is a Priority Watershed under PACFISH.

Upper Methow Watershed Analysis (USDA Forest Service 1998b)

The Upper Methow watershed is a designated as a Key Watershed under the Northwest Forest Plan. Most of the Upper Methow Late-Successional Reserve lies within the watershed. Two management activities were identified that have influenced aquatic habitat: recreational fishing that could increase bull trout mortality, and recreational use on portions of Riparian Reserves near Hidden Lakes.

Lower Methow Watershed Analysis (USDA Forest Service 1999c)

The Lower Methow River is designated as a Key Watershed under the Northwest Forest Plan and PACFISH.

Middle Lake Chelan Watershed Assessment (USDA Forest Service 1999d)

Lower Lake Chelan is not designated as a Key Watershed.

Upper Lake Chelan Watershed Assessment (USDA Forest Service 2000b)

Upper Lake Chelan is not designated as a Key Watershed.

Upper Skagit River Watershed Analysis (USDA Forest Service 2001a)

The Upper Skagit River is not designated as a Key Watershed.

Determination of Need and Extent Necessary for Commercial Services (Outfitters and Guides) in the Pasayten Wilderness and Lake Chelan-Sawtooth Wilderness, 2012 (USDA Forest Service, 2012)

The Forest Service Manual also includes the requirement to address the need for and role of outfitters in the Forest Plan. The Wilderness Act prohibits commercial services except “to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.”

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”, August 2012 (USDA Forest Service, 2012). This paper is referred to as the “2012 Needs Assessment” in this document. The following information is summarized from the Needs Assessment. The Needs Assessment is included in **Appendix B** of this FEIS.

The 2012 Needs Assessment found there is a need for pack and saddle stock outfitter guides in wilderness. The minimum amount of commercial services needed to provide for recreation is not a number that can be precisely calculated. Rather, several factors are considered to establish a range of service days that would provide the minimum extent of commercial service. Considering all the factors, the minimum extent of pack and saddle stock commercial services in the Pasayten will range from approximately 1,735 to 2,170 service days. In the Lake Chelan-Sawtooth, the range will be approximately 660 to 825 (Needs Assessment, 2012).

Purpose and Need for the Proposed 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,
- reconcile inconsistencies between forest plan standards and guidelines for barren core (see Glossary) in wilderness with party size limitations (currently 12 people and 18 head of stock), and the non-degradation policy and the prohibition on camps within 200 feet of meadows, streams, lakes, and special interest areas.

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. Part of the 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

FSH 2709.11 also includes the requirement to address the need for and role of outfitters in the Forest Plan. The Wilderness Act prohibits commercial services except “to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.”

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”, April 2012 (USDA Forest Service, 2012). This paper is referred to as the “2012 Needs Assessment” in this document. The following information is summarized from the Needs Assessment. Refer to **Appendix B** for the full document.

The 2012 Needs Assessment 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. Rather, several factors are considered to establish a range of service days that would provide the minimum extent of commercial service. The factors include the:

- need for commercial services,

- historic number of service days,
- proportional relationship between outfitter and non-outfitted use levels,
- current resource conditions and impacts from recreation use on wilderness character,
- wilderness capacity, and
- anticipated changes in overall number of recreationists and need for outfitter guides.

Considering all the factors, the minimum extent of pack and saddle stock commercial services in the Pasayten ranges from approximately 1,735 to 2,170 service days. In the Lake Chelan-Sawtooth, the range is approximately 660 to 825 (Needs Assessment, 2012).

Reconcile Inconsistencies Between Forest Plan Wilderness Standards and Guidelines

Currently both the Okanogan and Wenatchee Forest Plans have inconsistent management direction regarding party sizes and maximum vegetation loss (barren core) sizes. There is also inconsistency between campsite proximity to meadows, streams, lakes, and special interest areas and the non-degradation policy (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.

Currently, the Okanogan Forest Plan includes a standard and guideline that prohibits camping within 200 feet slope distance from meadows, lakes, streams, and key interest areas in the Pasayten and Lake Chelan-Sawtooth wilderness areas (MA15B-21L). The Wenatchee Forest plan does not include standards and guidelines restricting camping near these features. The established network of campsites includes approximately 500 sites in the Pasayten and 135 in the Lake Chelan-Sawtooth Wilderness. The pack and saddle stock outfitter-guides regularly use approximately 75 of those in the Pasayten and 24 in the Methow Valley Ranger District side of the Lake Chelan-Sawtooth, or a total of 99 within the area subject to the Okanogan Forest Plan requirement. Approximately 86 of these are within the 200-foot buffer around meadows, streams, lakes, and key interest points. The remaining 13 campsites would not be an adequate number for the pack and saddle stock outfitter-guide operations. As with the need to amend the barren core standards and guidelines, an amendment of MA15B-21 L is needed in order to provide the necessary pack and saddle stock outfitter-guide commercial services. Refer to **Appendix A** for a list of campsites, and which are within the buffer.

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 and were located close to meadows, streams, lakes, and key interest areas. These same campsites still exist and are currently used by both outfitter-guides and the non-outfitted public.

In the time between when the Forest Plans were published and the present (over two decades), substantial research on recreation impacts in wilderness has been conducted, and the results have consistently suggested that using existing, stable campsites is preferable to creating new campsites and degrading the wilderness character (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. Refer to Figures A-1 and A-2 for details about each camp.

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 cores in excess of the forest plan standards and guidelines. 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.

The Forest Service also encourages people to use existing campsites to avoid wilderness degradation by controlling campsite density and keeping the wilderness condition on the current upward or stable trend. As with the amendment for barren core, amending the Okanogan Forest Plan to allow outfitter-guides to use existing campsites is a mechanism to prevent wilderness degradation from creation of new campsites.

Proposed Action

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. The original proposed action included in the DEIS and used for public scoping was modified. The Forest Service Handbook was revised after scoping and the number of service days in the proposed action was modified to meet current handbook direction for determining service days (FSH 2709.11, Chapter 40). In addition, a forest plan amendment was added that would allow the outfitters to use existing campsites within 200 feet of meadows, lakes, streams, and key interest areas. Refer to the Alternatives Considered but Eliminated section in Chapter 2 for the rationale for eliminating the original proposed action. The original proposed action was eliminated from further consideration (see Alternatives Considered but Eliminated in Chapter 2). The modified proposed action became Alternative 2 in this FEIS. It is described in detail in Chapter 2.

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):

- 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 service 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 days (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 this document.

The proposed action includes assigned site locations within wilderness for existing assigned camps at Bald Mountain, Sheep Mountain, Crow Lake, Beaver Creek, and Whistler. Assigned sites are locations authorized for exclusive occupancy and use for which a fee is paid by the permit holder (also called 'designated' or 'reserved' sites). All sites listed above are in the Pasayten Wilderness (refer to **Map 3.2-1 in the Map Section** of this document). 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 at existing campsites to allow for closer monitoring and subsequent modification of use to address resource concerns and assist in outfitter-guide operations if needed in the future.

The proposed action also includes assigned sites for base camps at the Andrews Creek, Billygoat, Slate Creek, and Crater Creek trailheads (Methow Valley Ranger District); Fish Creek camp (Chelan Ranger District). These locations are outside wilderness. Each location has corrals, watering troughs, and other improvements necessary to protect resources. All assigned camps and base camps are shown on **Maps 3.2-1 and 3.2-2 in the Map Section** of this document.

Forest Plan Amendments

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, pack and saddle stock 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.

Standard and guideline MA15B-21L would be reworded as follows:

Campsites should be located at least 200 feet slope distance from meadows, lakes, streams, and key interest areas, except existing campsites used by pack and saddle stock outfitter-guides. Camping may be restricted or prohibited in certain areas to protect wilderness values.

Decision Framework

The Forest Supervisor of the Okanogan-Wenatchee National Forest is the Responsible Official and will decide whether or not to issue term special use permits to the outfitter-guides described in the proposed action. The Forest Supervisor will also decide what, if any, mitigation measures and monitoring are needed. The decision will be made based upon the analysis made in the FEIS and considering comments to the Draft EIS. It will be documented in a Record of Decision, a companion document to the Final EIS.

DECISION FACTORS

The Responsible Official will determine if the selected alternative is consistent with management direction. The decision regarding which action to implement will be determined by comparing how each factor of the purpose and need is met by each of the alternatives and the manner in which each alternative responds to Significant Issues. Concerns of particular relevance to this decision are:

- to what extent each alternative responds to applications for special use permits in a manner that provides stability to outfitter-guide businesses to allow financial commitments necessary to continue to provide public service;
- the extent to which each alternative meets the minimum extent necessary for commercial services in Wilderness, to provide for wilderness appropriate activities, and protect wilderness character while providing pack and saddle stock outfitter-guide commercial services in the Pasayten and Lake Chelan-Sawtooth Wilderness Areas,
- the extent to which each alternative designates an amount of campsite barren core in wilderness used by the pack and saddle stock outfitter-guides that is compatible with party size, and
- the effects of each alternative on the environment, particularly those aspects of the environment identified as Significant Issues.

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 altered when the revised Forest Service Handbook 2709.11 was published, giving specific direction on calculating service days. 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 DEIS was distributed to approximately 200 people and organizations on August 31, 2010. The original 45-day comment period was extended to 60 days to accommodate requests for additional review time. Two hundred and fifty-eight comment letters were received. All comments were addressed in the FEIS, and additional analysis was added where needed. Alternative 4 was added to respond to concerns about the barren core limitations in Alternative 2, and to a concern that the number of service days in Alternative 2 would not be enough for the pack and saddle stock outfitter-guides if the demand for their services rebounded to levels seen ten years ago. The Forest Service also determined that an amendment of the standard and guideline prohibiting camping within 200 feet of meadows, lakes, streams, would be needed to implement the proposed action.

The Issue Tracking Form in the analysis file summarizes and responds to each comment. All letters are included 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. Consultation with the US Fish and Wildlife Service and the National Marine Fisheries Service was completed, and both agencies issued concurrence letters. Consultation with the State Historic Preservation Office was not required because the proposed action and alternatives would be excluded from case-by-case review by the Programmatic Agreement.

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.

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 “Significant 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.

SIGNIFICANT ISSUES

Significant 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: untrammelled, 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.

Significant 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.

Significant 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 and in a Wildlife Biological Assessment (BA) completed for the analysis.

Significant 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 minimize impacts.

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

- effects determination statements from Biological Assessment for threatened and endangered fish species;
- quantitative estimates of the square feet of riparian areas affected by pack and saddle stock activities;
- 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 loose grazing on riparian areas, streams, and lakes,
- qualitative discussion about stream sedimentation;
- 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 and in the Aquatic Biological Assessment completed for this analysis.

Significant Issue 5: The barren core limitations in Alternative 2 would not be large enough for a party of 12 people and 18 head of stock, and the number of service days in that alternative would not allow the businesses to respond to increases in demand for pack and saddle stock outfitter-guide services.

The current pack and saddle stock outfitter-guides, in addition to numerous individuals and organizations, expressed concern over the barren core limitations and number of service days in Alternative 2 in the DEIS. They felt that a larger barren core was needed. They also felt that the number of service days in Alternative 2 would not allow them to respond to demand for their services if that demand increased to the level seen ten years ago.

The effects on outfitter-guide operations were measured by:

- quantitative discussion on existing barren core in outfitter camps, and the amount of area needed for a party of 12 people and 18 head of stock
- qualitative discussion on the impacts to the businesses from the number of service days.

Alternative 4 was added to this FEIS to address these concerns. The environmental and social impacts of the alternative are included in Chapter 3.

OTHER ISSUES

In addition to resources associated with the Significant 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, or found to be unaffected by the proposed action or alternatives, and were not used in alternative formulation. The effects on them are described in Chapter 3 of this document. The issues include:

1. Pack and saddle stock outfitter-guides could introduce noxious weeds into currently weed-free areas, such as wilderness, in stock manure. *Mitigation measures were added to avoid introduction and spread of invasive species, and to require the pack and saddle stock outfitter-guides to participate in the species identification, mapping, surveying and control*
2. Pack and saddle stock outfitter-guides could degrade air quality with smoke from campfires. *An analysis of smoke from outfitter-guide campfires found that it would not degrade air quality, or violate the Clean Air Act. The analysis is included in Chapter 3.*
3. Firewood gathering by outfitter-guides could degrade the environment by removing down woody debris and limiting or eliminating this habitat component. *A mitigation measure was added that would prohibit outfitter-guides from using downed wood larger than 12 inches in riparian areas. Another mitigation measure would prohibit outfitters from cutting snags for firewood. The terrestrial wildlife analysis found that firewood gathering (of downed wood) would not limit habitat for species needed downed wood.*
4. 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. *This was addressed in Alternative 4.*
5. 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. *These concerns were analyzed in the Recreation section in Chapter 3. Infrequent conflicts between user groups have been reported in the past.*
6. 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. *Mitigation measures were added to avoid or minimize impacts to soil and vegetation. Impacts to soil are included in the Soil section of Chapter 3.*
7. 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. *The range analysis found that forage utilization standards are not being exceeded. This is included in the Range section of Chapter 3.*
8. Pack and saddle stock outfitter-guides are important to the local economy. *An economic analysis was added to the FEIS. The results are included in the Economic and Social Analysis section of Chapter 3.*

ELIMINATED ISSUES

The following comments and issues were raised during scoping, but are eliminated because they 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 justification for this determination is included.

1. **Outfitter-guides should be required to pay fees adequate to cover costs of monitoring and trail maintenance.** *This has been determined by Forest Service regulations on special use permit fees (USDA Forest Service, 2008a).*
2. **Snowmobile tracks have been seen in the wilderness.** *This issue is outside the scope because this proposed action does not include winter-time outfitter-guide activities, such as snowmobiles.*
3. **There is a trend to use trail fees to make access easier for everyone.** *The use of Recreation Enhancement Act funds (“Trail fees”) is irrelevant to the decision of this analysis. Determining the use of fees and the accessibility of sites is not part of the purpose and need.*
4. **For greater protection of wolves, grizzly, wolverine, fisher and lynx, the Forest Service needs greater buffers around the wilderness.** *This issue is outside the scope of the analysis because the proposed action is to issue pack and saddle stock outfitter-guide permits. It does not propose any changes to threatened and endangered species habitat management. The Forest Service’s policy is to not maintain buffer around wilderness to provide an informal extension of wilderness (FSM 2320.3). Refer to the wildlife section in Chapter 3 for the analysis of the proposed action and alternatives on these species.*
5. **End road building, increase road obliteration, and stop resource extraction, especially old growth.** *This issue is irrelevant to the decision because the proposed action and purpose and need to not include any changes to the road network or resource extraction.*
6. **All existing regulations should be enforced for all users, e.g. protecting trees from stock and woodcutting, protecting lakeshores, riparian areas.** *The portion of this issue pertaining to non-outfitted people is outside the scope because the purposed action pertains to pack and saddle stock outfitter-guide permits. The effects of pack and saddle stock outfitter-guides on trees, lakeshores, and riparian areas are included in Chapter 3 and the requirements in the OG permits will be enforced.*
7. **Hannegan Pass has experienced significant bear problems because of careless food storage. Immediate requirements for proper storage should be implemented.** *Hannegan Pass is not within the analysis area, so this issue is irrelevant to the decision.*
8. **Set up a permit system to track usage of area and monitor impacts.** *This issue is outside the scope because the purposed action does not include establishing a permit system for non-outfitted recreationists. Outfitter-guide use is tracked and monitored as part of permit administration.*
9. **We need an EA or EIS on all recreational use.** *This issue is outside the scope of the proposed action, which specifically addresses pack and saddle stock outfitter-guides. Other recreational use in considered in the cumulative effects analysis.*

10. **The total number of people and stock should be limited.** *This issue is outside the scope of the proposed action because non-outfitted recreationists are not part of the purpose and need for action. The proposed action and alternatives address limits on both people and stock for outfitter-guides.*
11. **Eliminate sheep grazing.** *This issue is irrelevant to the decision because sheep grazing is not part of the purpose and need or proposed action.*
12. **The Forest Service is considering banning horses and outfitters from the Pasayten.** *This issue is not accurate, and is outside the scope of the analysis because any limitations on non-outfitted pack and saddle stock use is not part of the purpose and need. Alternative 1, the No-Action alternative, examines the effects of not issuing pack and saddle stock outfitter-guide permits across the analysis area, including the Pasayten Wilderness. The other alternatives permit both horses and outfitters in the Pasayten Wilderness.*
13. **The Forest Service is eroding public liberties in the Pasayten Wilderness.** *This is irrelevant to the decision because the treatment of the public by the Forest Service is not connected to or influenced by the pack and saddle stock outfitter-guides.*
14. **We request that you develop a long-term monitoring plan for condition of resources. Monitoring trail use, campsite use, and other recreation factors would be useful.** *This is outside the scope of the proposed action. Wilderness monitoring is an ongoing activity. Monitoring of pack and saddle stock outfitter-guide activities is included in the alternatives, and in the monitoring plan in this document and will be accomplished through permit administration.*
15. **Make certain areas such as fragile meadows, lakes, and riparian areas are off limits to horsepackers.** *This issue is outside the scope of the proposed action because any limitations on non-outfitted pack and saddle stock users is not part of the purpose and need. Alternative 1 would not issue pack and saddle stock outfitter-guide permits, so there would be no outfitters in these areas of concern. Alternative 3 would prohibit pack and saddle stock outfitter-guides from camping within 200 feet of wetlands, lakes and streams. An alternative that would have prohibited outfitters from camping within 200 feet of all meadows, streams, lakes and key interest areas was considered but eliminated (see Alternatives Eliminated from Detailed Study in Chapter 2). The effects of pack and saddle stock outfitter-guides on these resources is included in the specialist reports, and in this document.*
16. **Private users with stock are causing serious impacts also, and an EA should be done on that, too. Forest plan amendments should apply to everyone.** *This is outside the scope of the proposed action, which only includes pack and saddle stock outfitter-guides, not private users.*
17. **I am very much opposed to closing horse camping around Rimmel Lake and in the meadow about Middle Oval Lake.** *The Forest Service is not proposing to close these areas to horse camping, so this issue is inaccurate and conjectural.*

18. **Three immediate threats to this important habitat: use by commercial backpack groups like Outward Bound, the Pacific Northwest Trail designation, and increased recreational use of the Boundary Trail from Castle Pass to Ross Lake.** *Non-outfitted recreation and commercial backpacking groups are outside the scope of the proposed action. The effects of their activities are included in the cumulative effects analysis.*
19. **Designating the Pacific Northwest Trail would degrade habitat.** *Designation of the Pacific Northwest Trail is irrelevant to the decision because it has no bearing on the environmental effects of issuing pack and saddle stock outfitter-guide permits and is not part of the purpose and need. National Trail designation is under the authority of Congress, which has already designated the Pacific Northwest Trail.*
20. **Propose protecting key habitat from extensive recreational use other than that of commercial use.** *The activities of non-outfitted users are outside the scope of the proposed action. The overall effects of recreation use are included in the cumulative effects analysis.*
21. **The issues to address in a Conservation Assessment for Spanish Camp should include habitat in addition to occurrence, distribution and status of TES species.** *The proposed action does not include completing a Conservation Assessment for Spanish Camp, so this comment is outside the scope. The impacts of the proposed action and alternatives on threatened and endangered plant species are disclosed in the Botany section of Chapter 3.*
22. **The Chinook Pass Wilderness has been impacted by pack and saddle stock.** *This issue is irrelevant to the decision because the Chinook Pass Wilderness is not within the analysis area.*
23. **The distance people should be allowed to penetrate the wilderness should be limited to a maximum of 20 miles from any designated trailhead.** *This issue is irrelevant to the decision because the purpose and need does not include changing the activities of non-outfitted recreationists. An alternative that would have limited the distance pack and saddle stock outfitter-guides could travel from trailheads was considered but eliminated. Refer to the Alternative Considered But Eliminated section in Chapter 2.*
24. **Protect trails from overuse by stock and ensure trails are better maintained.** *Trail maintenance is irrelevant to the decision because it is not within the purpose and need. The impacts to trails from outfitter-guide use are addressed in the Soil section of Chapter 3.*
25. **Consider ways to limit use when necessary, perhaps with extended seasonal closures.** *There are no existing seasonal closures in wilderness. Proposal for new closures is outside the scope of the proposed action and purpose and need to issue permits to Outfitter-Guides.*

26. **Outward Bound is causing resource damage, in addition to other concerns.** *This issue is irrelevant to the decision because Outward Bound is not a pack and saddle stock outfitter-guide. Outward Bound's use is considered in cumulative effects*
27. **One or more of the current permittees have attempted, through litigation, to restrict certain members of the public access to areas in the Pasayten. This is a violation of their special use permits.** *This issue is a legal matter, and irrelevant to the decision².*
28. **I do hope the Forest Service will call more attention to the budgetary needs for accomplishing protection goals.** *Forest Service budget levels are irrelevant to the decision because the budget is determined by Congress.*
29. **No guided trips for killing wildlife should ever be permitted in this area. The following should be banned in this area: hunting, trapping, new roads, all two stoke vehicles, grazing, mining, logging, drilling, and prescribed burning.** *These issues are irrelevant to the decision. Hunting and trapping regulations are determined by Washington State Department of Fish and Wildlife. Impacts of recreational livestock grazing are addressed in various resource sections in Chapter 3. New roads, two stoke vehicles, commercial livestock grazing, mining, logging, drilling, and prescribed burning are not associated with pack and saddle stock outfitter-guides.*
30. **I suggest that you start managing your wildernesses by establishing use capacities and issuing permits to the number of recreationists that fall within those capacities.** *Capacity analyses were completed for the Pasayten and Lake Chelan-Sawtooth wildernesses as part of the Need Assessment and Minimum Extent Necessary Determination (USDA Forest Service, 2012 and Appendix B). Any type of limitation on non-outfitted recreationists is outside the scope of this analysis because the purpose and need does not include non-outfitted use.*
31. **Cattle and sheep grazing should be returned to the forest.** *This issue was eliminated because it is outside the scope of the analysis.*

² The DEIS contained some inaccurate information under this eliminated issue. The Forest Service regrets the error.