

Cumulative Effects Analysis for Issuance of Bob Marshall Wilderness Complex Outfitter and Guide Permits, April 2005

The majority of environmental effects associated with outfitter and guide use are specific to the activities permitted under each permit. These include such effects as ground disturbance associated with established camps. In addition, there are social issues and indicators that have a role with all users in the wilderness both outfitter publics and non-outfitter publics. These effects are considered and disclosed in individual analyses prepared for each permit. However, some resource values span large geographic areas and can be affected by groups of, or all of the proposed permitted activities. This cumulative effects analysis is prepared to disclose those cumulative effects and is intended to be considered and incorporated into those individual analyses for which they are identified.

Proposed Action: The Flathead, Lewis & Clark, Helena, and Lolo National Forests are preparing to re-issue special use permits for outfitting and guiding in the Bob Marshall Wilderness Complex (BMWC). The complex consists of the Great Bear, Bob Marshall and Scapegoat Wilderness Areas, for a total of 1.8 million acres in North Central Montana.

Background: Outfitter use in the BMWC appears to have begun in about 1919, when Joe Murphy of Ovando packed hunters into the South Fork of the Flathead River area. The number of outfitters operating in the BMWC increased over time until the number was capped in 1981 at 45. Most of these operations have been in existence for 25-65 years, some longer. Most of these permits are due to expire on April 30, 2005.

A moratorium was placed on granting new outfitter permits or changing use levels of existing outfitters in 1981. The moratorium was established to set a limit on the number of outfitter service days until Forest Land and Resource Management Plans were revised or amended.

All Forest Plans for the four National Forests managing the BMWC were amended with Wilderness Recreation Management Direction commonly referred to as the LAC Plan or Wilderness Plan. These Forest Plan amendments provide the following specific direction:

“Prior to completing a decision on outfitter service levels through an environmental assessment, no additional outfitter and guide permits will be issued nor will approval be granted to expand operations beyond use levels authorized in 1978-1980 Special Use Permits.”

The LAC Plan or Wilderness Plan was developed for several reasons, first to address increasing visitor use resulting in more pressure on the wilderness resource. Second, managers and citizens were concerned about the potential impacts and changes in wilderness conditions and experience. Finally, regulations developed pursuant to

provisions of the National Forest Management Act passed by Congress in 1976 require the Forest Service to develop specific management actions to protect wilderness values.

The Forest Plan amendments identified management actions to reduce, prevent or rehabilitate unacceptable resource and social conditions in the BMWC. The amendments also established specific standards of acceptable conditions in the wilderness and identified how managers will go about determining what management actions are most suitable to address specific problems. Finally, the amendments established a monitoring process to identify the effectiveness of management actions and to keep track of changes in wilderness conditions. Managers conduct annual monitoring to ensure the entire wilderness is monitored every 5 years. The results show where problems exist, so appropriate actions can be taken. Overall conditions have improved in the BMWC and changes to commercial operations have occurred that have improved operations and resource conditions. Ongoing LAC monitoring in coordination with active permit administration assures a thorough monitoring protocol.

The scope of this proposal is limited to the existing permits. It is beyond the scope of the proposed action to consider additional use levels, additional assigned sites, additional spike camps or to change current use within seasons. Permits would be reissued under the current allocation moratorium (1986 Forest Plan Standards). Change of allocation of outfitted and/or non-outfitted use is a Forest Plan revision or amendment action. Individual changes of each specific permit (including increases and/or decreases in priority use) would be within the existing allocation levels, these would be in line with national policy.

In reviewing the specific LAC monitoring data of the assigned sites, respective opportunity classes within each resource area, and in context of each respective resource area the following is a summary for the BMWC:

Effects to Wilderness Character: The Wilderness Act of 1964 allows commercial services to be performed within wilderness areas but also directs the Forest Service to manage wilderness areas in such a manner as will preserve wilderness character. Though the Wilderness Act does not explicitly define wilderness character, the definition of wilderness in Section 2 (c) describes wilderness as being untrammeled and undeveloped, managed to preserve natural conditions and with opportunities for solitude or primitive and unconfined type of recreation. The Forest Service must keep evaluate any possible negative effects to these characteristics when considering any proposed project or activity in wilderness.

Untrammeled—Free from human control or manipulation

The BMWC has been managed over the years to allow natural processes to operate freely. The Complex has an active wildland fire use program and has been careful to minimize any rehabilitation work after natural fires. Rehab work has been completed on the trail system to keep visitors on the trail system. There has been some prescribed fire

in the Scapegoat Wilderness on the Lewis and Clark National Forest for the express purpose of providing a safe boundary to prevent natural fire from escaping the wilderness boundary and threatening private homes and resorts.

The forests have worked closely with the permitted outfitters and guides in the BMWC to minimize the impacts to their operations from wildland fire. Fires have not been suppressed because of the presence of an outfitter or an outfitter camp. Rather the forest managers have provided assistance to outfitters to move their camps when they were threatened by fire or they have provided alternative areas for outfitters that have been displaced by fire. The outfitter program has not had any negative effects on the untrammeled qualities in the BMWC.

Undeveloped—Lack of evidence of modern human presence, occupation or modification

Outfitters in the BMWC are sometimes authorized the use of base camps. These camps are located by wilderness managers and are typically located in areas that are considered more resilient. When outfitters have base camps, they typically do have some structures associated with their camps; particularly when they are providing fall hunting opportunities. Typically the structures are necessary to contain stock and to minimize and contain impacts. All of the structures are temporary and the outfitters are required to dismantle and remove the structures prior at the end of the season, with the exception of native tent poles which may be stashed out of the sight. Each outfitter in the BMWC is required to submit to the District Ranger an annual operating and campsite plan. This plan details exactly what is approved in that outfitters camp. Camp inspections are conducted each season and weather permitting, an inspection is conducted at the end of the season, to ensure that evidence of the camp has been removed. Outfitters are permitted to cut down trees for tent poles. Tent poles are typically cut down when a camp is initially authorized, then used for many, many years. Fire wood must be gathered from dead and down wood well away from the camp. Specific trails associated with assigned sites and operations are included in the campsite plan and keep use confined to the trail locations to contribute to undeveloped character.

Outfitters camps can be difficult to distinguish from camps used by the non-outfitted public, particularly because of the extent of gear required to stay for extended periods of time during fall hunting season (October and November). The thing that may distinguish them is that it is not unusual for outfitted groups to be larger than non-outfitted groups, though outfitters are required to stay within the established party size limits in the BMWC (15 people and 35 head of stock). A 2003 study showed that the average group size for outfitted parties was 7.2 people and 14.5 head of stock compared to 3.3 people and 5.2 head of stock for non-outfitted parties. Typically stock groups in general travel in larger parties, though hiker use is twice that of stock groups.

In general, outfitted activities and the number of outfitter operations in the BMWC do not have a negative effect on the undeveloped character of the BMWC.

Natural—Ecological systems are substantially free from effects of modern civilization

Evidence of effects to the natural character of a wilderness can be the presence of exotic species, changes to air and water quality, and effects of past timber harvest. One of the greatest threats to wilderness in the Northern Region is the presence of exotic plants. A baseline inventory has been completed in the BMWC and conditions are monitored regularly. New infestations are immediately treated and so far, the BMWC has been successful in eradicating noxious plants and preventing new infestations. The outfitter and guide community has been extremely supportive with these efforts and are an important partner with the Forest Service in monitoring conditions and in treating new infestations (primarily hand pulling).

Many of the outfitters in the BMWC are traveling with stock (horses and mules). One of the greatest contributors to introduction of noxious weeds is stock feed and seeds being carried in on horses and mules. The BMWC requires that people use only processes weed seed free feed. This is strictly enforced. The outfitters have a vested interest in keeping the BMWC free of noxious weeds and are therefore very willing to comply with all regulations and guidelines.

Air quality standards are established for the BMWC as a Class I air shed and air quality monitoring is conducted regularly. Outfitter camps are placed at locations to minimize conflicts rivers, lakes and streams. Topography influences where locations have been approved. Camp plans, submitted as part of their operating plan, identify water sources for both camp use and stock. These locations are typically identified with input from a wilderness manager and then they are inspected annually to detect and mediate any impacts to water quality.

The current number of outfitters in the BMWC is not having a negative effect on the natural conditions in the wilderness.

Opportunities for solitude or primitive and unconfined recreation—Feeling of remoteness, solitude, freedom, risk and challenge

The BMWC is over 1.5 million acres located in North Central Montana. It is vast country that is difficult to penetrate for people who don't have a significant amount of time. In this vast area, visitor use is less than approximately 150,000 visitor days (one visitor for one day) per year. The 2003 visitor use study found that on average groups encounter no more than two groups per day. Day hikers encountered on average three other groups and overnight groups on average 1.1 other groups.

Most Outfitter base camps are carefully located in areas away from trails and busy intersections. Outfitters tend to take longer trips than the outfitted public; 3.5 days

compared to 2 days. This allows the outfitter to get his/her clients deeper into the wilderness where they are less likely to encounter other groups.

Travel in the BMWC is generally via primitive means; foot, stock, or boat. There is one airstrip at Schafer Meadows in the Great Bear wilderness. There are a few outfitters that utilize this public airstrip – most if for use on the Middle Fork of the Flathead river during the floating season and a small amount associated with the fall hunting season

Since outfitter use has not been allowed to grow since 1981 and non-outfitted use in the BMWC has not grown significantly since that time either, there are no negative effects to opportunities for solitude and primitive or unconfined recreation in the BMWC from the permitted outfitters.

Terrestrial/Aquatic/Plant Species

Included in the project file are Biological Assessments (BA) for threatened and endangered aquatic, terrestrial and plant species. Biological Evaluations (BE) for the sensitive species are also in the project files for aquatic, terrestrial and plant species. Rather than evaluate the individual outfitter or assigned site for these species, they were evaluated individually and then together to assure the cumulative effect of the outfitted use was evaluated and considered. The recommendations from the BA's and BE's are included in the decision documents to be included in the permit operation plan. (For example, the permits shall include and adhere to the Grizzly Bear Food Storage Order) The specific effects are disclosed in the prepared BA's and BE's. Based on the BA's and BE's and the concurrence from the Fish and Wildlife Service (USFWS) we have determined that the cumulative effects are minor and do not identify a potential for "significant" environmental effects.

/s/ Deb Mucklow, Lead Complex Ranger 2005