

Appendix D Needs Assessment

Needs Assessment for Commercial Pack Stock Services in the Ansel Adams, John Muir and Dinkey Lakes Wildernesses

Summary

This Needs Assessment evaluates and analyzes the need for commercial pack stock services in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses. It supplements the Needs Assessment contained in Appendix D of the 2001 *Wilderness Management Direction for Ansel Adams, John Muir, and Dinkey Lakes Wildernesses Final EIS*. The preparation of this Needs Assessment is guided by both interpretation of the legal requirements of the Wilderness Act and direction in Forest Manual 2320.

Commercial pack stock use has a long history in these wilderness areas; however, recent trends point to a decrease in both the number of pack stations and the number of clients serviced. To assess the need and appropriateness of commercial pack stock services in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses, a survey was conducted in July and August 2005. The survey targeted 2004 overnight commercial pack stock clients. Based on the analysis of this survey, the services currently provided by these operations are proper and consistent with the intent of the Wilderness Act. The Needs Assessment concludes that there is a need for at least the current level of commercial pack stock use in these wildernesses. The Needs Assessment further concludes that the public need for these services is actually higher than what is provided today. Commercial pack operations in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses are already heavily regulated by the Forest Service as the need for public access to the wilderness areas is limited by the need to preserve the wilderness character of the areas. Some of these regulations have, to some extent, limited the commercial packer's ability to meet the public's full need for these services. Also, based on demographic trends, there will be increased need in the future for commercial pack stock services in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses.

Document Structure

The Needs Assessment is divided into two sections. The first section provides the legal basis and direction for preparing a Needs Assessment. Next, a brief history of pack stations in these wilderness areas is provided along with a review of the services that they provide. Current commercial pack stock trends are examined including the types of services offered and groups serviced by these operations. To finish this section, there is a discussion of commercial pack stock use in the wilderness within the context of other uses, along with the regulations and mechanisms that have been placed on pack stock operations to protect the wilderness character of these wildernesses. The second section contains an analysis of the need for commercial pack stock services in these wilderness areas. Current levels of use will be discussed and evaluated by

two tests: first, whether the activities associated with the commercial pack stock use are proper in the Wilderness and second, whether there is a need for the service.

Also discussed will be the extent necessary; that is, whether the level of service is the extent necessary to realize the purposes of the Wilderness Act. A survey of past commercial pack stock clients conducted during the summer of 2005 will provide much of the basis for this analysis of current level of use. The next subsection of the second section will focus on whether the public's need for commercial pack stock services is being fully met today. Lastly, demographic trends and their implications for the future need of commercial pack services will be discussed.

Section 1 – Background and History/Trends for Commercial Packing

I. Legal Requirements for a Needs Assessment

As this Needs Assessment is being applied to wilderness areas, requirements of the Wilderness Act, signed into law in 1964, need to be considered. The Wilderness Act states that “commercial services may be performed to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the Act.” The “recreational or other wilderness purposes of the Act” is clarified earlier in the Act in Section 4(b) which specifies that “except as otherwise provided in this Act, wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.”

The primary Forest Service Manual direction for the preparation of a Needs Assessment can be found in Manual 2320 which states that “[a]s identified in forest land and resource management plans, provide for commercial outfitting and guiding services that address the concerns of the public health and safety and foster small business.” The 1988 Inyo National Forest Land and Resource Management Plan identifies the general need for commercial services in the wilderness. Further, the 2001 Wilderness Plan identified the need in Appendix D, Needs Assessment, for commercial pack stock services in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses. The level of service needed is not identified in the 2001 Needs Assessment; however, the document did conclude that there was a need for pack stock services in these wilderness areas. It is the intent of this Needs Assessment to further analyze and identify the extent to which commercial pack stock services are needed in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses.

There is a basic tension between the Wilderness Act objective of preserving the wilderness character of an area and the devotion of the area to public purposes such as recreation. This is particularly true with respect to commercial pack stock use in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses. As the Needs Assessment will show, there is a definite and clear need for commercial pack stock services in the wilderness areas and these services are appropriate and proper for realizing the recreation and other wilderness purposes of the area. This use, however, has to be limited by the need to protect wilderness character. The purpose of this Needs Assessment is not to resolve this tension between recreation and wilderness character. Rather, it is to acknowledge that this tension exists and that the resolution of the tension is a challenge fraught with difficulty. For these wilderness areas, the decision as to the appropriate

level of commercial packing services will be made in the Record of Decision for the Trail and Commercial Pack Stock Management Final EIS.

II. History of Packing in the Sierra Nevada

Chapter 3 of the *Trail and Commercial Pack Stock Management in the Ansel Adams and John Muir Wildernesses Final EIS* provides an extensive review of the history of commercial packing in these wilderness areas. The history of guiding with pack and saddle stock in the Sierra Nevada, including these wilderness areas, indicates that commercial guides and services—as well as the first rangers and military patrolling the forest reserves—began in the late 1800s. In 1871, Tom Agnew, who built a cabin in what is now called Agnew Meadows, guided visitors with pack stock in the San Joaquin drainage for the Yosemite Park Rangers. Allie Robinson in 1872 packed commercially from Onion Valley. E.H. Edwards Mercantile in Lone Pine advertised “Outfitting store for camping expeditions to Mt. Whitney and Cottonwood Lakes” in 1874. The Pine City Feed and Livery Stable (later known as the Lake Mary Pack Station) transported people and supplies in 1878 across the Sierra to and from Mammoth City and Fresno Flats. Helen McKnight Doyle, in her book *A Child Went Forth*, describes pack trips into the Mammoth and June Lakes area for fishing vacations. The Pioneer Stables, located in Bishop Creek, advertised in the *Inyo Register* in 1887. (Eastern Sierra Packers Association, 2000)

The founding of the Sierra Club by John Muir in 1892 focused widespread public interest on visiting the Sierra Nevada and preserving Yosemite Valley, the giant sequoia groves, and other natural landmarks. In order to develop a constituency for the Sierra Club’s preservation efforts William Colby started a tradition of conducting trips into the Sierra Nevada in 1901. For the next 50 years the large Sierra Club High Trips kept packers busy and led the way for thousands of wilderness adventurers. They were elaborate affairs, lasting 2 to 4 and sometimes up to 8 weeks involving an average of 150 people, around 50 packers and long pack trains of up to 250 mules carrying 100 pound stoves and full-time cook crews (Farquhar, 1965; Dilsaver and Tweed, 1990; Jackson, 2004). These types of outings helped to promote the wilderness concept and contributed to building the necessary support for passage of the 1964 Wilderness Act (Eastern Sierra Packers Association, 2000).

The unrestricted use of forest reserves by packing operations ended in 1906 with the creation of the Forest Service. (The Inyo and Sierra National Forests were created in 1907.) Regulations were instituted to control the degradation of public lands. They included the number of animals used in each forest, the allowed period of time for grazing, a requirement for grazing permits, a grazing fee, and the approval for structures such as out-buildings, tent sites, drift fences, and corrals. Other concerns such as fire suppression, camp sanitation, trail maintenance, and adherence to Fish and Game laws were addressed. By 1920, both the Park Service and Forest Service required a concessionaire’s permit for packing operations (Jackson, 2004).

Packing became a profitable business in the 1920s, with 36 large pack outfits operating in the southern Sierra Nevada and, of those, 15 (42%) were on the east side (Jackson, 2004). Many of the currently operating pack stations can trace their history back to the 1920s and 1930s (Eastern Sierra Packers Association, 2000). The earliest pack station on the Inyo National Forest that is still functioning is Rock Creek Pack Station, established in about 1919 or 1922 (Marye Roeser, former co-owner of Mammoth Lakes Pack Outfit, Personal communication, 2004 and 2005).

Most of the early recreation use in the back country, almost all of which was supported by pack trains, was fishing and hunting. After the hoof and mouth epidemic in 1924 reduced visitor use for several years, pack outfits increased in the southern Sierra Nevada to 71 in 1935 with 22 (31%) in the eastern Sierra Nevada (Livermore, 1935).

The Great Depression and World War II brought problems to commercial packers in the Sierra Nevada. Gasoline rationing restricted travel to pack stations and lack of personnel due to the military draft brought near disaster to the pack outfitters. Even the profitable Sierra Club High Trips were suspended until the end of the war (Jackson, 2004). The Inyo National Forest, which administered all Forest Service land in the eastern Sierra Nevada, listed nine pack operations in 1942. This was 14 less from the war's beginning in 1941.

The number of pack stations again increased to about 60 on both sides of the crest between Sonora and Walker Passes in 1947 after World War II. As a result of an improved economy, longer vacations, better access to the mountains by automobiles, and light weight materials, recreational packing boomed (Livermore, 1947). Two-thirds of those outfits and stock were based on the east side. The growing numbers of operations created intense competition and customers demanded better service. With this increased competition came an increase in more stringent business practices such as liability insurance, performance bonds, financial reports, schedules of personnel and stock, and logs to track the numbers of animals grazed, number of customers, service days, destinations, and day trip rentals. Along with bookkeeping was added pack station maintenance and increasing costs of doing business such as feed, salaries, stock, equipment, supplies, maintenance, and insurance. Pack outfits either lost money or barely met expenses (Jackson, 2004).

Beginning before the war and continuing into the 1950s, packing operations began to feel other changes that made the business less profitable (Jackson, 2004). Government contracts became scarcer and the automobile and airplanes began to replace mules as a means of transportation. Much of the back country was closed to hunting when Kings Canyon National Park was established in 1940 (Livermore, 1947). Boats were restricted to non-motorized ones and permits were required to pack them in. Loose herding of stock was prohibited on non-hazardous trails by 1950. Overused camps and meadows for grazing were placed off-limits and even permitted meadows could no longer support the demands of pack trains. In 1946 the number of animals permitted on any single trip into the national parks was limited to 75.

Commercial pack stations hit their peak in the ten years or so following World War II. Since the 1950s, the number of pack stations has decreased considerably. Likewise, the number of stock and clients serviced has also decreased.

Not accounting for fluctuations, the decline in the intensity of pack operations in the southern Sierra Nevada (from Yosemite National Park south) can be partly measured by the estimated number of stock owned, which decreased from 2764 head in 1935 to 1420 in 1986—a 51% decrease. There was also a consolidation of pack stations between 1935 and 1964 although the total number of pack stations in 1964 implies a secondary peak of 66 in a downward trend, of which only 17 (25%) were on the east side, the lowest percentage since 1920 (Jackson, 2004; Livermore 1935; Sierra Club 1952; High Sierra Packers Association, 2000).

This downward trend continued into the 1990s. The number of pack outfits decreased to less than 50 in 1990. Major pack stations from the Kern Plateau to Silver Lake numbered 71 at a historical maximum and only 13 by 2004, an 82% reduction. In order to maintain a viable

business a few of the more prosperous pack stations in the northern study area, Frontier, Red's Meadow, and Rock Creek Pack Stations have been supplementing their income by offering saddle day trips to tourist-organized horse drives in the Long Valley and Mono Basin areas. This is in addition to the earlier variety of trips offered outside the fully outfitted traveling trips such as spot trips, trail rides, base camps, and dunnage packs and caches.

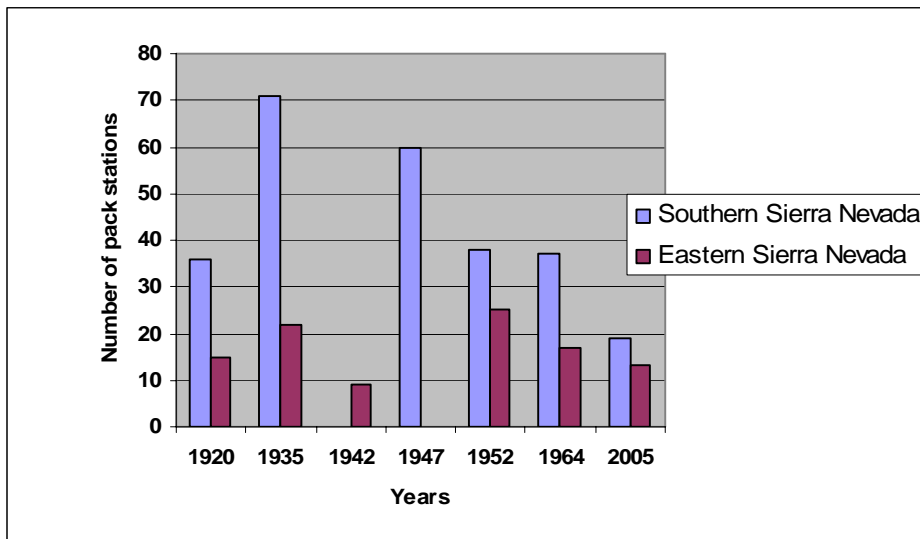
III. Current Packing Trends and Activities

Commercial packing operations in the Sierra Nevada peaked in the years following World War II. Since the 1950s, there had been a trend towards fewer pack stations, commercial stock in the wilderness areas, and clients utilizing the services. There are a number of reasons behind this downward trend including the development of roads closer to wilderness boundaries and the proliferation of personal automobiles. The discussion below focuses on the downward trend of the number of pack station, commercial pack stock, and clients serviced.

Pack Stations Numbers

After peaking in the years before and after World War II, the number of commercial pack stations servicing the Sierra Nevada has declined considerably. Figure 1 shows the decrease over the last fifty years. Numbers were generated from several sources and, in some cases, are for somewhat different geographic areas. The overall trend, however, is clear: there are far fewer pack stations servicing the Sierra Nevada today compared to fifty years ago. *The Tourist Packing Business of the High Sierra Region*, a study by Norman B. (Ike) Livermore, Jr. conducted in 1935, reported 71 pack stations serving the High Sierra area from Kernville to Yosemite, with over 2700 head of stock. (Livermore, 1935) Today, the number of pack stations serving the same Sierra region is less than 30. Several operations were consolidated and some were eliminated as roads penetrated farther up the east and west slopes of the Sierra Nevada, thereby reducing the need to originate trips from the valley floor. In the 1920s and 1930s trips would take anywhere from 10 to 30 days. In today's world, few visitors are willing to commit the same amount of time on a wilderness vacation.

Figure 1. Comparison of the number of commercial pack stations servicing the southern and eastern Sierra 1920-2005

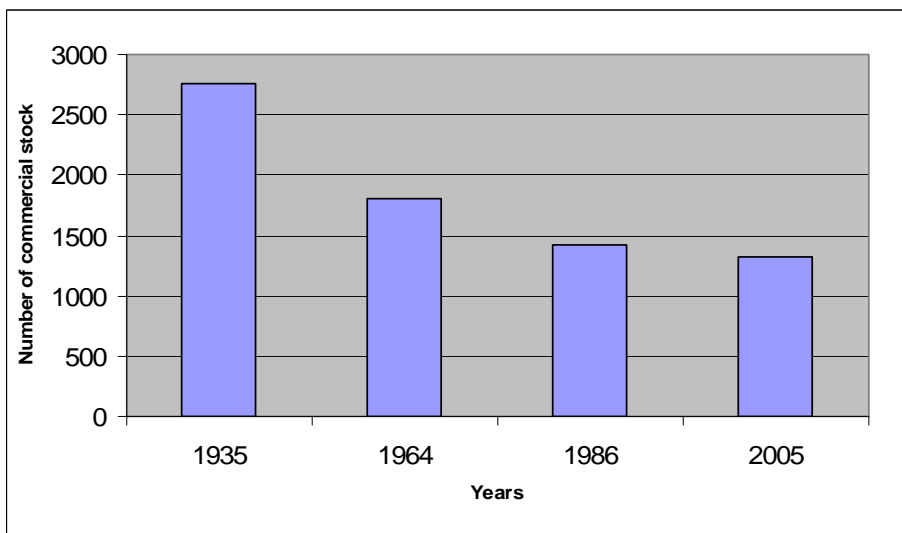


Note: The eastern Sierra includes pack stations from Silver Lake to the Kern Plateau. The southern Sierra Nevada includes pack stations south of Yosemite. (sources: Jackson, 2004; Livermore, 1935; Sierra Club, 1952; Inyo National Forest, n.d.)

Commercial Stock Numbers

Paralleling the decrease in the number of commercial pack stations has been a decrease in the number of commercial pack stock in the Sierra Nevada. Using historical sources, it is not fully known how the numbers of pack stock have fluctuated in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses. These historical sources, however, can be used to compare commercial stock use in a wider area. Figure 2 shows the drop in the number of commercial pack and riding stock used in their operations in the Sierra Nevada region over the last 70 years.

Figure 2. Commercial pack stock in the Sierra Nevada 1935-2000.



Sources: Jackson, 2004; Livermore, 1935; Sierra Club, 1952; Inyo National Forest n.d.

The reduction in stock numbers from 1935 to 2004 is 1446; or a total reduction of 52%. The reduction in stock numbers from the 1964 Wilderness Act to 2004 is 489; or a total reduction of 27% for roughly the same general area.

Pack Stock Client Trends

According to use data presented in the John Muir Wilderness Plan (1979), from 1972 to 1976, the total use in the wilderness averaged 84,873 people. At the time, commercial pack clients made up 5% of the use in the wilderness and so during the 1970s there were an average of 4,244 pack stock clients in the John Muir Wilderness. For the years 2001-2004, the average number of pack station clients for both the Ansel Adams and John Muir Wildernesses was 4,783. The John Muir Wilderness portion in 2001-2004 averaged only 3,319 clients. This represents an average of 925 fewer clients or a 22 percent reduction between the 1970s and 2000. This contention is further supported by the 1979 John Muir Wilderness Plan (page 6): “Nineteen commercial packers serve the John Muir Wilderness. Most of these operate out of facilities located near the trailhead they use. Commercial pack stock use has not increased appreciably over the past two decades.” And, the 1979 Minarets Wilderness Plan (page 5) states, “Commercial pack and saddle stock use has remained static or has even declined slightly during the past decade.”

IV. Limiting commercial and non-commercial uses in the wilderness to protect wilderness character

The need for commercial stock service in these wildernesses has been established in a number of management documents including the 1988 Inyo National Forest Land and Resource Management Plan and the 2001 Ansel Adams, John Muir, and Dinkey Lakes Wildernesses Final Environmental Impact Statement. The limiting factor defining the extent necessary for areas served are the wilderness standards set to preserve the wilderness character. For more than 30 years, the Forest Service has determined that higher levels of pack stock use could unacceptably impact the wilderness character of wilderness areas and as a result has imposed use and activity limitations and restrictions on them. For example, the 1979 Minaret Wilderness Management Plan (USDA Forest Service, 1979) states, “Pack station stock numbers will not be allowed to increase, unless special studies show an increase to be compatible with the wilderness resource.”

Over the years, controls on commercial pack stock have become more stringent and site-specific. Prior to 2001, commercial pack stock operations did not operate under quotas. Appendix L of the 2001 Wilderness Plan (Quota Rationale) was used for setting first-time commercial quotas, and did include an analysis of appropriate commercial (and non-commercial) quotas based upon the identified resource concerns and limiting factors. Further, the 2001 Wilderness Plan Record of Decision stated that “Alternative 1 Modified establishes quotas at levels of use that we believe are compatible with maintenance of wilderness character. Quotas were examined by comparing recent actual commercial and non-commercial daily use levels by entry point with their impact on the physical, and to a lesser extent, social/experiential resources (such as potential for crowding due to topography and use patterns). Quotas were evaluated and sometimes adjusted for non-commercial and established at appropriate levels for commercial operators consistently across the wilderness. In areas where it was determined that by reducing the daily overnight use levels there would be a positive effect or correct an identifiable resource concern, appropriate adjustments were made to quotas” (Appendix L, 2001 Wilderness Plan).

Additional standards set in the 2001 Wilderness Plan that directly and indirectly define the limits for allowing areas to be used by commercial pack stock and their clients include trail and user-created trail standards, campsite and campfire restrictions, grazing standards, best management practices for water quality, and standards to avoid impacts to critical wildlife areas. These standards define and limit the areas accessible and available to commercial pack stock use and service. For example, the 2001 Wilderness Plan directs that “All commercial pack stock must stay on designated trails, except where authorized in advance by the Forest Service for alternative routes or to access campsites and grazing areas.” This defines and limits the extent of areas and locations that commercial pack stock services are permitted. Clients of commercial packers are generally limited to only areas with approved trails. The 2001 Wilderness Plan also directs that no new trails will be constructed. This further defines that trail expansion or opening of new areas will not happen. Areas open to commercial pack stock clients are further limited by the availability of suitable grazing areas, campsites, campfires, and approved use-trails.

The 2005 wilderness planning efforts continue this trend by adding new restrictions including designated campsites, destination quotas, grazing and trail suitability, and stock limits. These new regulations will further define where, when, and how commercial pack stock can travel in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses. Collectively, these limitations restrict commercial pack stock services to about 9% of these wildernesses.

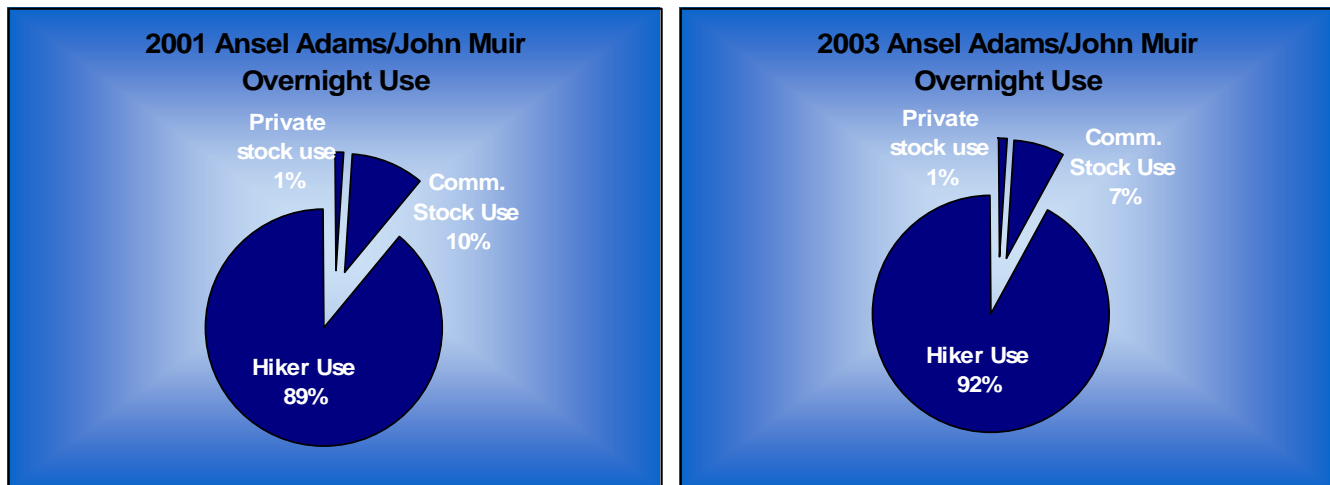
Allocation of capacity between wilderness user groups

Along with wilderness capacities and putting in management standards, another issue to resolve is how to allocate use of the wilderness between the various user groups, including commercial pack stock, backpackers, and outfitters/guides. This balancing between different visitor groups is a fundamental issue in the wilderness without an easy answer. In the 1970s, when the Forest Service first required wilderness permits, established trailhead quotas to manage use, restricted party size, restricted camping and campfires, and took other actions judged necessary to protect the wilderness character, it was the managers’ objective to “freeze” the level of commercial pack stock activities. This level of use for commercial pack stock services resulted in a relatively finite number (measured in stock numbers and service days) that effectively prevented them from growing or meeting the needs of visitors. With the necessary wilderness protection controls and restrictions in place, managers determined it was adequate to use only a permit and daily trailhead quota for the vast majority of the users (mostly backpackers) and maintain a constant level of commercial pack stock regulated by service days and pack stock numbers.

There has been an annual capacity allocation of roughly 6-8% to visitors needing commercial pack stock services, 5% to visitors needing other commercial services, and more than 87% to non-commercial visitors. Allocating only 6-8% of the use capacity of these wildernesses to people needing commercial pack stock services is probably not enough in light of future trends (see discussion below of demographic trends).

Commercial pack stock use in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses currently make up a relatively small percentage of use (see Figure 3).

Figure 3. Comparison of overnight use in the Ansel Adams and John Muir Wildernesses 2000-2003



Note: The percentage of overall commercial use changes annually as a result of total overall use changes as well or as much as commercial use changes. This shows the fluctuation between 2001 and 2003. Changes in these years resulted from the court ordered reduction in commercial pack stock services.

Since more than one user group is competing for the available capacity during popular times of the year to visit these wilderness areas, limits and allocations must be set for all user groups. For commercial packers, the most sensitive factor that managers have consistently concluded must be limited and regulated is the use of the pack stock. It is this reason that pack stock services and numbers have been held static at benchmark levels and the service area restricted to only 9% of the total area where it is judged sustainable and compatible with preserving the wilderness character.

V. Commercial Packing Services and Trips

In 2004, commercial packers serviced approximately 4,000 overnight clients in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses. Similar to past years, commercial packers provided a number of different trips and services for both the public and private sector. The following is an overview of the trips and services provided by commercial pack stock operations.

Types of Groups Serviced

This section describes the types of groups that commonly utilize commercial pack stock to access and experience the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses. Section 2 will introduce and discuss the topic of need categories.

Family and Multi-generation Groups: Many individuals and families have traditionally engaged in summer wilderness “pack trips” in these wildernesses areas. Grandparents (and great-grandparents) who have spent many summers in the Sierra want to share and experience the wilderness with their children, grandchildren, and great-grandchildren—all together. More and more “Baby Boomers” who were backpackers in the 1970s now need the services of packers in order to access these areas with their families and children. For these family groups, the Sierra experience is very important to them for their wilderness recreation and enjoyment, and to

pass along to their children and families their wilderness values. Because many of these families have young children or members unable to walk or carry their own equipment, the packer services are needed for their transportation to wilderness. For others, the riding and pack trip itself is the experience desired; many people who want to experience a stock supported trip do not have access to animals or knowledge to use them. No attempt to quantify these types of trips will be made here; however, visits to pack stations during the summer of 2005 revealed a number of multi-generational trips. Many of these groups included fairly young children who were entering the wilderness—with the help of commercial pack stock—with their parents and their grandparents. Anecdotal conversations with these types of groups revealed a common theme—older wilderness users were eager to experience the wilderness with a younger generation.

Organized Groups: Groups sponsored by Boy and Girl Scouts, churches, YMCAs, schools, universities, companies, conservation groups, clubs, organizations, camps, inner-city youth programs, and others commonly require packer services to provide their camps and logistics for their wilderness trips. Many of these groups have been taking pack-supported trips for decades, some even pre-dating the Wilderness Act. Without packer services, many of these groups would not be able to serve their group needs, as often not everyone is capable and fit enough to walk and carry their own gear.

Special Function Groups: These trips are generally organized for a specific purpose related to wilderness use; they often focus on an educational aspect of wilderness such as photography, art, writing, spiritual enrichment, research, medicine, nature study, etc. Agency sponsored trips are also supported by pack and riding stock, and include trail crews, search and rescues, fish stocking, survey crews, mapping specialists, military personnel, and Congressional representatives among others. Special function groups often have materials and equipment too bulky and heavy to carry with backpacks and include members who are not capable of walking or carrying their own equipment. Visits to pack stations during the summer of 2005 provided an opportunity to talk to these types of groups. Again, there is no attempt here to quantify the number of groups that fall under the “special function” grouping. Pack station visits conducted during the summer of 2005 did reveal, however, that a number of groups utilize commercial pack stock to transport their gear. A number of fishing related parties were encountered as well as a landscape painter who was utilizing commercial packers to transport easels and painting equipment. Native American groups also utilize commercial pack stock support to help with their annual traditional walks. Bishop Pack Outfitters, for example, has for a number of years provided pack stock support for some Native American walks free of charge. In addition, during the Draft EIS public comment period, a comment was received from the State of California Snow Survey group reiterating the importance of commercial pack stock support for their activities.

General Outings: There are hundreds of visitors each year who travel individually or gather with a small group of friends, family, or work associates and take a commercial pack-supported trip to simply enjoy and experience the wilderness. They may engage in several types of activities while in the wilderness such as day hikes from a base camp, fishing, photography, etc. Many of these visitors desire to experience wilderness riding and using pack stock, but do not have access to private stock or the knowledge to properly use and handle pack stock in a wilderness setting. Again, anecdotal conversations with commercial pack stations clients during the summer of 2005 revealed a number of groups that consisted of friends and family who

desired to experience the wilderness but did not have the knowledge or physical ability to backpack into the area over night.

Types of Commercial Pack Stock Supported Services

There are a number of services currently provided by commercial pack operators. The following provides an overview of these types of services.

Spot Trips: Visitors ride and their gear is packed to a pre-selected area. The stock and packer do not generally stay in wilderness but return for the visitors on a predetermined date to take them out. Some spot trips are one-way spot trips in which the client rides in the first day to help with elevation acclimation and then hikes out at the end of their trip.

Dunnage Trips: Visitors' backpacks, food and camp equipment are packed into a specific location, and they hike to meet it. Spot and dunnage trips comprise approximately 80% or more of the overnight services provided by packers.

All Expense/Traveling Trips: These are customized trips that will meet the visitors' specific needs for dates, locations, and members of the party. The pack and riding stock, packer and a cook are also provided on these trips. There are several variations of the all expense trip including hiking with pack stock, continuous hire of stock and packer, and trail rides. **Hiking with Pack Stock** offer visitors the option to have all of their equipment, food and supplies provided, or they can supply their own. Generally the visitors will hike, and have their camp and equipment packed. There may be some visitors who choose or have to ride because of physical limitations. **Continuous Hire of Stock and Packer** are for those who wish to have the packer and stock remain with them throughout the duration of their trip. The camp-gear and provisions are provided by the visitors. **Trail Rides** travel to pre-advertised locations within the wilderness and provide the "classic" Sierra pack trip wilderness experience. They can either be fully outfitted by the pack station, or there can be a combination of equipment supplied by the visitors. The outfitter supplies the packing and riding stock, a packer and a cook, and the staff will stay with the party for the entire trip. These are pre-advertised, with set dates and locations.

Day Rides: Commercially guided riding trips are available for those visitors who want to enjoy the wilderness scenery, take photos, go fishing, or visit a special area for just a few hours. Rides vary in length from one hour to all day.

Section 2 –Need for Commercial Packing Services in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses

This section analyzes the current level of commercial pack stock use in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses. The analysis will consist of two tests: first, whether the activities supported by commercial pack stock are consistent with the intent of the Wilderness Act and second, whether there is a need for the wilderness user to utilize commercial pack stock to experience the wilderness. A survey was conducted during the summer of 2005 to quantify the appropriateness and level of need for commercial pack stock services. The survey is described in more detail below.

The strategy for determining the need for commercial pack stock will be to look at current use levels and determine whether the current level of service reflects the actual need for commercial pack stock service in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses. This need will be examined by analyzing the current level of commercial pack *clients*. The need for commercial stock services can be best analyzed using this approach. Another strategy may be to address whether the current number of permitted pack *stations* are necessary for realizing the intent of the Wilderness Act. This strategy is inferior and largely irrelevant to determining the need for commercial pack stock service in the wilderness as it does not address the level of actual public use in terms of client numbers. The current number and location of pack stations in the project area has evolved to its current state over a number of years. Pack stations are generally located in areas that are in drainages in close proximity to recreation areas. Most of these operators have been operating in their current locations for a number of years and have a high level of knowledge of the area. Most importantly, the number of operators does not matter to the overall need to protect the wilderness—the number of trips and level of use is what is important to analyze. Eliminating operators will have no effects on the impacts of commercial packing unless the use level is also lowered. Reducing the number of operators, however, may have serious implications for the public’s ability to use the service as some areas may become underserved unless new operators are willing to truck their stock to distant trailheads. The question of the level of need is best addressed, then, by examining the public use of the services.

The 2005 Commercial Pack Client Survey results will be used to determine whether the activities associated with commercial pack stock are appropriate and consistent with the intent of the Wilderness Act. The survey results will also be used to analyze the level of need for commercial pack stock services. Part IX will look at demographic trends that may influence the future need for commercial pack stock service in these wildernesses.

The next section will describe the two tests. The results of the survey are discussed below in the Public Purposes of the Wilderness Act and Need for Commercial Packing Services sections.

Part VI Description of Two Test Evaluation of Current Levels of Commercial Pack Stock Use

Test One: Public Purposes of the Wilderness Act

The first test for the current level of commercial pack services is whether the service supports activities consistent with the public purposes of the Wilderness Act. The Wilderness Act allows for commercial services in the wilderness that support “activities which are proper for realizing the recreational or other wilderness purposes of the Act.” The language “recreational or other wilderness purposes of the Act” is clarified earlier in the Act in Section 4(b) which specifies that “wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.”

The following is an overview of the ways in which commercial packers contribute to the public purposes of the recreational, scenic, scientific, educational, conservation, and historical uses of the Wilderness Act.

Recreational: The types of trips and services that are recreational in nature are for relaxation, fishing, hiking, horseback riding, photography, enjoyment of the wilderness areas, and to basically get away from the urban environment. The historic and classic “Sierra Pack Trip” fits into this type of use. Many family or group members are not physically capable of walking and/or carrying their gear because of their age, physical conditions or other limitations. Some groups lack the specialized knowledge or experience to travel and camp safely or properly in wilderness. For many individuals and groups, packers offer the needed services and support to allow wilderness visitors to use and enjoy these areas for proper recreation purposes. Annually, packers serve approximately 4,000 overnight visitors and approximately 3,500 day riders. This may represent less than 8% of the total visitors to these wildernesses, but without packer services, many of these visitors would not have any opportunity or ability to recreate in these areas.

Scenic: These wildernesses are some of the most scenic areas in the world. Overnight and day use visitors to these wildernesses frequently mention that viewing the scenery is one of the primary purposes for their visit. All of the individuals, groups, organizations, and agencies that commonly use and rely upon pack stock services for their recreational benefits also realize scenic benefits from their wilderness visits. Pack station operators make it possible for many people who otherwise could not hike to see and appreciate the scenery of these areas.

Scientific: Extensive research and study has been conducted in these three wilderness areas. Generally, equipment and supplies needed to support the research is bulky and heavy, and is needed in very remote locations. Commercial pack stock services are generally the most suitable and appropriate form of transport in these wildernesses. The alternative modes of transport, such as helicopters, are less appropriate. Some examples of research efforts supported by commercial pack stock are: Earthquake Research by University of Nevada – Reno, U.S. Geological Survey (USGS), University of Utah, U.C. Berkeley, the University of Hawaii, and China; Volcanic Research by USGS; Mineral Deposits by USGS and Bureau of Mines; Water Resources by California Department of Water Resources for snow and water surveys; Yellow-legged Frog Research by UC Santa Barbara, California Department of Fish and Game; Bighorn Sheep Research by California Department of Fish and Game; Spotted Owl Surveys by Forest Service and Pacific Southwest Research Station; and Fish Stocking Research by California Department

of Fish and Game. The Eastern Sierra region, including the Sierra Nevada range, is one of the most heavily used areas for research and study because of the vast wildernesses, parks, and other public lands that make it ideal for studying the undeveloped and natural world. Packers play a significant role in facilitating the transport for many of these research projects. And, without their services the impact on the wilderness solitude would certainly be more significant as researchers and agencies would be forced to rely more frequently on mechanical transport.

Educational: These wildernesses are natural learning centers. Universities, organizations, agencies, and individuals use these areas for educating students, members, and personnel. Pack stations often are needed to transport base camps, personnel, and equipment to wilderness locations. Pack stations have provided support to organizations, agencies, and companies developing documentaries about wilderness. Natural History, Geology and Astronomy courses are frequently offered through universities and conservation organizations in cooperation with and supported by Eastern Sierra Packers. Some groups with programs assisted by the packers include: U.C. Riverside, U.C. San Diego, Saddleback Community College, Santa Rosa Community College, and U.C. Davis. Other youth programs that have a long history with using packers for trips include: Youth Enrichment (LA PD), YMCA (20 or more locations), Churches (20 or more locations), Bear Valley Native American program, and Girl Scouts and Boy Scouts. Groups promoting personal growth such as Pacific Crest Outward Bound are also supported by packers. Packers also sponsor and support horse packing and horsemanship courses, professional packing schools, and minimum impact stock courses for persons using stock in the wilderness.

Conservation: Historically, commercial packers have contributed to the conservation component of the public purposes of the Wilderness Act by facilitating public access into the wilderness areas of the Sierra Nevada and by providing support for conservation related



President Roosevelt and John Muir Horseback, 1903
(Source: Yosemite Museum National Park Service)

activities in these wilderness areas.

The early days of the Sierra Club outings in the Sierra Nevada, for example, were primarily supported by commercial pack stock. Today, commercial packers continue to build constituency for the wilderness concept by providing access to these wildernesses for individual and groups who might otherwise not have the ability to experience and enjoy the areas.

In terms of conservation projects, Forest Service, California Department of Fish and Game, California Water Resources Department, and other agencies use the packing services of

these pack stations for supporting resource and conservation work in wilderness. Removal of litter and facilities, trail maintenance, watershed restoration, airplane wreckage removal, maintenance of fish barriers, and similar support are provided by commercial pack stock. Studies and inventories by agency specialists sometimes use packers. Packers are also called upon to provide the support for “partnership and policy trips” including federal agencies,

congressional representatives and staff, judges, county and state leaders to discuss and review conservation efforts and work. In fact, Sierra packers have served dignitaries such as Secretary of State Robert McNamara, Governor Ronald Reagan, Supreme Court Justice William O. Douglas, Theodore Roosevelt IV, and the California Fish and Game Commission.

Historical: A “Sierra Pack Trip” is considered by some to be the ultimate experience reflective of our rich western and wilderness heritage. While commercial pack stock services have a practical and necessary function of transporting people who need help to access and use these areas, to others, their services are part of the wilderness experience itself and provide the only practical opportunity for many visitors to experience the wilderness pack stock tradition of these wildernesses. Without their packing services, many people who desire this recreational and historical experience would not be afforded it, as few people have the necessary pack stock, skills, knowledge, or experience to use pack stock in a wilderness setting by themselves. Not only is the history of these wildernesses deeply rooted in the use by commercial pack stations, many of the prominent landmarks are also either named by or after packers. Packers pass along their historical knowledge to their clients and enrich their experiences and understandings of these areas and about wilderness itself.

Test 2: Need for Commercial Packing Services

This section discusses the second test for current levels of commercial pack stock; whether there is a need for the use. Six categories of need have been identified. This test and these categories provide the basis for addressing the Wilderness Act standard that, “Commercial services may be performed within the wilderness areas designated by this Act to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas.”

Categories of Need

1. Persons with physical limitations that make them unable to walk and/or carry their own equipment.

- Disabled persons
- Persons physically and medically limited (back/knee injury)
- Persons with diseases and health conditions that limit strenuous exertion (heart, hypertension, etc)
- Elderly and very young persons with limited mobility or endurance
- Persons lacking adequate physical conditioning to achieve desired experience or activity

2. Persons with equipment too bulky or heavy to carry.

- Photography equipment
- Water floatation devices such as rafts or canoes
- Supplies and equipment for extended stays or travel
- Search and Rescue equipment
- Equipment and materials necessary for approved uses and activities such as dam maintenance, mining, watershed and fish projects, etc.
- Equipment and materials necessary for Universities, contractors, and cooperators with approved studies
- Equipment and materials necessary for groups with extended trips into the backcountry

3. Hunters needing pack stock to haul game.

- Deer hunting in wilderness zones under State law

4. Persons desiring a wilderness “pack trip” or “day ride” experience.

- Persons desiring a pack trip but who lack knowledge or skills to handle or use stock in wilderness setting
- Persons desiring a pack trip but who lack wilderness knowledge to safely and properly travel and camp in a wilderness setting, and require professional assistance to guide and advise them
- Persons desiring a pack trip but who do not own stock, or otherwise have access to suitable pack stock
- Persons desiring a pack trip who own private stock suitable for wilderness use but who practically cannot use their own stock
- Persons who are seeking the traditional “Sierra Pack Trip”

5. Persons able to walk but affiliated with persons falling into need categories 1-4, and therefore included as member of commercial group.**6. Native American traditional walks or gatherings requiring pack stock to transport camps and persons not able to walk.****Categories where commercial pack stock support is not necessary include:**

- Persons able to walk and hike and carry their own equipment and their wilderness experience is not dependent upon using pack stock or riding horses.
- Persons wanting horseback rides – but their experience is not wilderness dependent. For these individuals and groups, the horseback ride itself is the desired activity and a wilderness setting is not needed for this experience.
- Persons owning private stock suitable for wilderness travel who also possess the skills and knowledge to properly use them in wilderness.
- People utilizing commercial pack stock to transport equipment that is not legal in wilderness (e.g., chain saws, bikes).

Decisions related to categories determined “not needed or necessary” were based upon either: (1) lack of demonstrated need, (2) activities not dependent upon a wilderness setting, or (3) needs that clearly conflict with wilderness protection standards.

Rationale for Categories of Need

Many categories of need are fairly straightforward and evident, such as persons who require pack stock to transport them and their equipment and supplies because they are physically not capable of hiking and/or carrying camping equipment. As described in the trends section below, this is a large and growing segment of the American population. While this category may be the most obvious and compelling group of persons needing commercial pack stock, they are not the only group needing services for their wilderness access or recreation experience. As previously mentioned, many other individuals, families, groups, agencies, universities, organizations, contractors and tribes also require pack stock assistance to transport people with special needs, to carry bulky and heavy equipment and supplies, and to realize their desired wilderness

experience. Without commercial pack stock support, many of these appropriate wilderness activities would not be possible for those individuals and groups listed.

Persons who may be able to walk and carry their own equipment, but elect to experience wilderness with riding and pack stock—the historical “Sierra Pack Trip”—are also in need of commercial pack stock services in these wilderness areas. Most private citizens wanting this kind of wilderness experience do not have the animals, specialized skills to handle pack stock, or equipment to achieve their desired wilderness experience, and therefore need the services of commercial packers. The history and practices of every wilderness area is different, and Congress clearly recognized that besides wilderness recreation, another important purpose of wilderness was the study and experience of its history. For most of the Sierra Nevada wilderness areas, using pack stock is a historical practice and part of the wilderness experience for many past and present Americans. The use of pack stock, and the packing profession, is deeply rooted in the history of these wildernesses. The “Sierra Pack Trip” is an appropriate and historical form of primitive recreation for these wildernesses; and, the only way that individuals can have this experience is with commercial services, unless they have their own stock.

Some potential consequences to the wilderness environment and administration of these areas in the event the agency determined that “The Sierra Pack Trip” category of need was not appropriate or needed, is significant. People would still have the need and right to use “private” pack stock to realize a desired “pack trip” or “day ride.” They could buy, rent, or borrow animals for their access and use. While some private stockowners (such as Backcountry Horsemen) have the knowledge, skill, and ability (as well as commitment) to practice proper stock ethics in a wilderness setting, most urban and even some rural visitors needing commercial pack stock support for their “pack trip” or “ride” experience do not. (The stock impacts and damages to the wilderness character from many more visitors using private stock rather than using commercial packer’s service would most likely be significant and unacceptable.)

The Wilderness Act does not specifically define or limit who can or cannot use wilderness areas. It states that wilderness areas “shall be 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 also specifies that wilderness, “has outstanding opportunities for solitude or a primitive and unconfined type of recreation” and “shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.” Forest Service wilderness policy (FSM 2320) states, “Consistent with management as wilderness, permit outfitter/guide operations where they are necessary to help segments of the public use and enjoy wilderness areas for recreational or other wilderness purposes.” In light of the Wilderness Act and Forest Service guidance, all need categories identified and stated above (except those identified as not needed) are determined in this analysis to be appropriate categories to receive commercial pack stock services in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses. These service and activity needs are consistent with the outfitting and guiding services provided to the public in these areas before and after the 1964 Wilderness Act, and are consistent and compatible with the intended mode of primitive travel (foot and horseback) appropriate and envisioned under the Act.

Part VII. 2005 Commercial Pack Client Survey

During the summer of 2005, a survey of commercial pack clients was conducted. The intent of the survey was to determine whether commercial pack stock clients were engaged in activities proper for the wilderness and to quantify the level of need for commercial pack stock service.

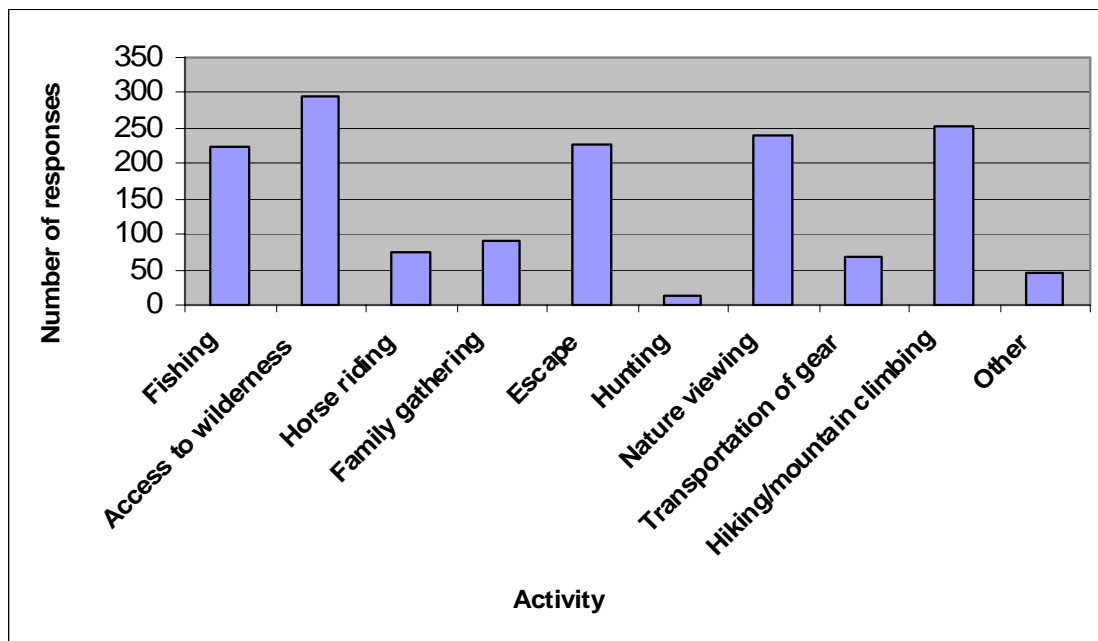
The survey instrument was developed and field tested at several pack stations in July 2005 (see Attachment 1 for a copy of the survey instrument). In early August 2005, the survey was mailed to 537 pack stock clients from 2004. The names and addresses of the clients were gathered from the Inyo and Sierra National Forests' Wilderness Permit Databases. The clients contacted were the individuals who identified themselves as the group leader and provided their names and addresses when receiving their wilderness permit. In 2004, 4,015 overnight clients were serviced by commercial pack stock. The average group size was three individuals, so approximately 1,338 commercial packing groups used the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses. A total of 346 surveys were filled out and returned to the forests. In all, data was available from 346 out of the 1,338 commercial groups that utilized commercial pack stock in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses (approximately 40% of the groups). This sample size provides a more than 95% confidence level; that is, we can be more than 95% sure that the results from the 346 respondents accurately reflects the results that would have been obtained by hearing from all 1,338 groups that utilized commercial pack stock services in 2004.

Results of the Survey

Survey Results for Test One: Public Purposes of the Wilderness Act

Test one analyzes whether commercial pack stock services are supporting activities that are proper in the wilderness and fulfill the public purposes of the Wilderness Act. The 2005 Commercial Pack Client Survey was used to identify the activities that people engage in when using commercial pack services to access the wilderness. Of the 346 survey responses, the overwhelming majority included activities that are consistent with fulfilling the public purposes of the Wilderness Act (Figure 4 shows the responses from the survey). The most popular activities identified as being a purpose of the wilderness trip were fishing, hiking/mountaineering, and nature viewing.

Figure 4. Survey results: activities on pack supported trips



Another question asked in the survey: “Could you have met the purposes of your trip by taking a horse trip outside the boundaries of wilderness areas?” reveal the extent to which these activities (for the survey respondents) are wilderness-based. Out of the 339 surveys that responded to this question, 276 or 81% reported that they could not have met the purpose of their trip on a trip outside wilderness.

The survey shows that members of the public are using the services of commercial pack stock operators to enjoy activities that are proper in the Wilderness. Further, survey respondents report that the purpose(s) of their wilderness trip can not be met by taking a trip outside wilderness. The next issue to examine is to analyze how many commercial stock clients fit into one of the categories of need which will be introduced in the next section.

Survey Results for Test 2: Need for Commercial Packing Services

The section will focus on the need for commercial services by looking at whether commercial pack stock clients surveyed in 2005 fall into one or more of six categories of need for these services. Results from the 2005 Commercial Pack Client Survey were used to quantify the need categories described above. A question from the survey (“Why did you choose to use pack and/or riding stock for your wilderness trip?”) was used to determine the need category (if any) the group fit into. This survey focused on groups, not individuals. It is both impractical and impossible to determine whether each individual of a group utilizing commercial pack stock matches an identified need category. The survey was mailed to group leaders and answers from the above question determined whether the group needed commercial pack stock to accomplish the purpose of their wilderness trip. The results from the survey are shown below in Figure 5.

Figure 5. Survey results: level of need

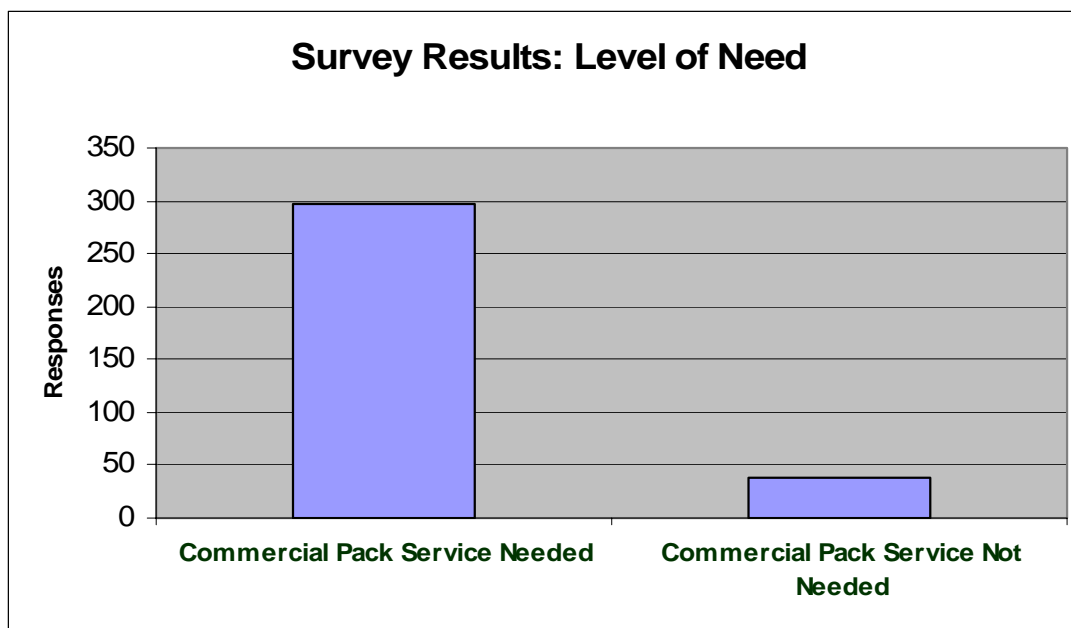
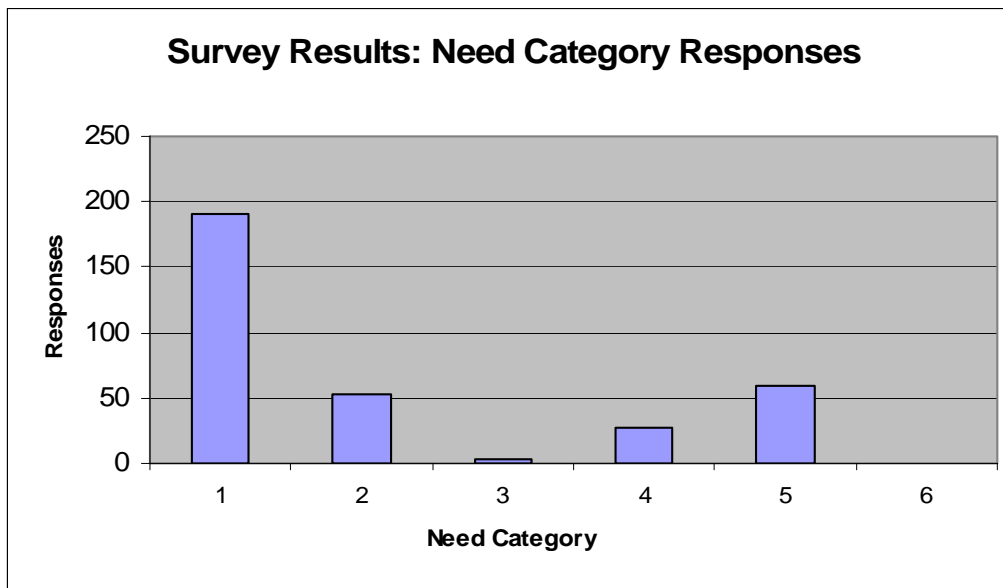


Figure 5 shows that the overwhelming majority of survey respondents needed commercial pack services to accomplish the purposes of their wilderness trip. A total of 336 surveys provided sufficient information to determine whether commercial pack stock service was needed. It was determined that 298 or 88% of the groups needed commercial services. Figure 6 shows the breakdown of groups into the five need categories.

Although the majority of responses indicated a need for commercial services, some survey responses were clearly from groups and/or individuals that did not need the service to access the wilderness. Responses in the “not needed” category were from individuals who indicated that they were physically capable of carrying their own pack, but used commercial pack service for convenience or to save time. One response, for example, said that commercial pack services were used because the wilderness user “was lazy and could afford it.” This is an example of a client who was not placed in one of the six Need Categories. These types of responses, however, were the minority; most of the responses indicated a definite need for commercial pack support for their trip.

Figure 6. Survey results by need categories



*Category 1 includes persons with physical limitations

Category 2 includes persons with equipment too bulky or heavy to carry

Category 3 includes persons hunting deer

Category 4 includes persons desiring a wilderness pack trip experience

Category 5 includes individuals able to pack their own gear but traveling with someone in Categories 1-4

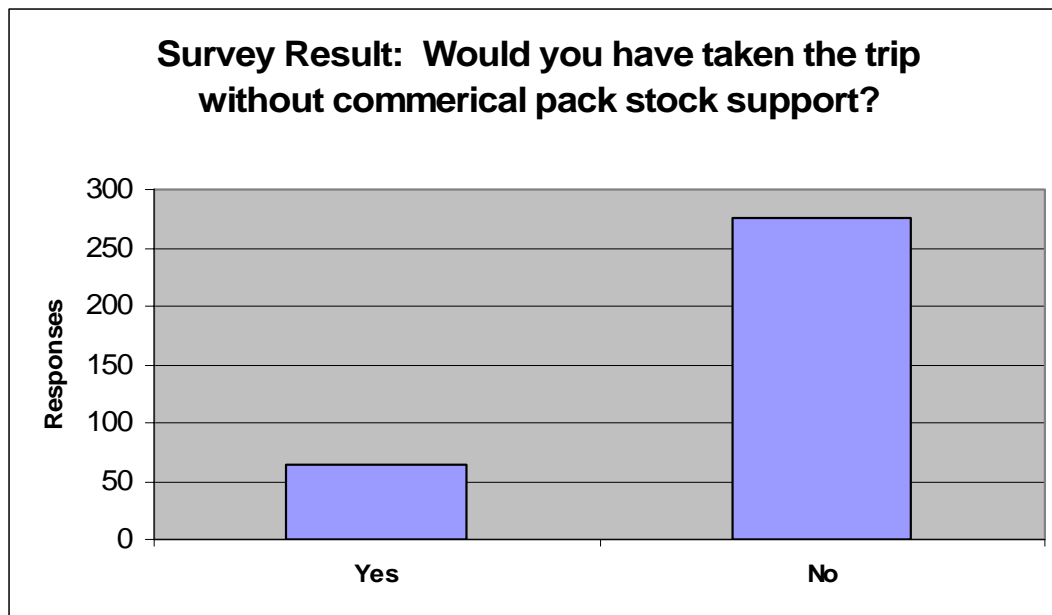
Category 6 includes Native American traditional walks or gatherings

**The numbers in Figure 6 total more than 298 as some groups fell into more than one category.

Category 1, the Need Category related to physical need, was the most common reason cited for securing the services of a commercial packer. Many of these respondents reported that they were elderly or had some physical limitation that made it all but impossible for them to carry a backpack and access the wilderness on an overnight trip. A number of these people also indicated that while they were backpackers at one time, commercial pack stock now provided an essential service for them. Without stock, many of these people would not be able to access the wilderness. Another common response came from group leaders who indicated that they were bringing their entire family, including children, along on the wilderness trip. Many of these respondents said that commercial pack stock support were crucial if children were to be included in the wilderness trip.

The results from another question from the survey (“Without commercial services, would you have taken the trip?”) reinforce the need for commercial services for some of these groups. Figure 7 shows the results of this question.

Figure 7. Survey Result: Would you have taken the trip without commercial pack stock support?



Interpreting the responses to this question were a bit difficult as some individuals answered for themselves while others answered for the groups as a whole. For example, some respondents stated that they would still have taken the trip without commercial pack stock; however, other members of the group would not have been able to. Nevertheless, the results of this question reinforce the overall result of the survey: the overwhelming majority of groups that currently utilize commercial pack stock support need this service for their wilderness trips.

Wilderness Day Rides

Wilderness day rides were not included in the 2005 Commercial Pack Client Survey. Instead, pack stations were visited during the summer of 2005 and anecdotal information was gathered on this activity. During the course of this analysis, several aspects of wilderness day rides became clear. First, the vast majority of wilderness day rides only enter a small portion of the wilderness. The Rainbow Falls Day Ride in the Mammoth Lakes area, for example, only enters wilderness for a few hundred feet and is mostly in Devil's Postpile National Monument. It is, however, considered a wilderness day ride. This ride is quite popular and accounts for more than 30% of all wilderness day rides on the Inyo National Forest. Examining use data shows that this is fairly typical of wilderness day rides: most of these rides do not penetrate particularly deep into wilderness. Most, if not all, of the day rides enter wilderness for only a mile or two or less. The reasons for this are many, but perhaps most significantly, individuals looking for a day ride will not be able to or are not interested in being on a horse for more than a couple hours. Typically, day riders are the least experienced of commercial pack clients and they typically are not interested in more than a two-hour ride. Most of the so-called wilderness day rides are in the front country with a relatively small percentage of the ride entering the wilderness. For many front country trails, the wilderness boundaries are miles from the trailhead and day rides only enter the wilderness for a relatively short distance.

Another aspect of wilderness day rides is the clientele and their need for the service. Anecdotal observations at pack stations reveal that a sizable percentage of day ride groups are made up of

families with younger children. Day rides provide these groups with a new experience and are important in exposing younger generations to the forested environment. The mode of transport (i.e., horses) appears to be an important consideration for day rides. Likewise, there is a need for a scenic destination for the trip. The proximity of the pack station to wilderness boundaries makes it nearly impossible for the rides to avoid wilderness altogether. Although not tracked in a formal survey, it appears as though many of the day riders would fit into Need Category #4 (persons wishing to have a wilderness-based horse back ride).

Currently, there are approximately 4,000 day rides that enter the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses. As stated earlier, the majority of these rides only briefly enter the wilderness. Given the limited entry of these rides into wilderness, there are few, if any, environmental effects associated with these rides. In fact, day rides constitute one of the least impacting methods of experiencing wilderness for wilderness visitors.

The demographic trends described below (particularly trends indicating an aging, more urban population) point towards an increased need for day rides in the future. Therefore, there is a need to continue to provide a range of day rides that will accommodate an expected increase in the need for this service.

Survey Conclusions

The results of the 2005 Commercial Pack Client Survey indicate that the vast majority of clients are utilizing commercial stock for activities that are proper and consistent with the intent of the Wilderness Act. The overwhelming majority of the groups that utilize commercial stock are in one of the identified need categories and would not have been able to take the trip without the service. Commercial pack stock provides an essential service to the individuals and groups that utilize it; it is likely that most of these individuals and groups would have limited or no access to the wilderness without commercial pack stock services.

VIII. Current Constraints on Meeting the Full Public Need for Commercial Pack Stock Services

It is important to note that one of the purposes of this Needs Assessment is to provide a sense of what the overall public's need for this service is. A number of other considerations should be factored in when arriving at this overall level of need. It is not reasonable to conclude that by pure chance the Forest Service has arrived at a level of service that is nearly equal to the public's need for commercial services in the Ansel Adams/John Muir Wildernesses. Given the results of the survey and conversations with commercial packers, it is more likely that the public's full need for these services is not being met. The survey showed that the overwhelming majority of current use is proper for wilderness and is needed by the public to access the wilderness areas. In 2004, 4,015 clients were supported by commercial pack stock services in the wilderness. As the survey revealed, nearly 90% of the groups brought into the wilderness fit into one of the identified categories of need. Given the high percentage of current users of commercial pack stock that fit into a need category, it would be logical to assume that there is a certain level of public need for this service that is not being met and indeed based on conversations with pack station operators, it is likely that the full public need for these services is not being met.

Current restrictions on commercial packing in the wilderness have contributed to an inability to meet the full public's need for these services. Commercial pack operators have identified various restrictions that limit the ability of the business to meet the public's need for commercial service, including group size, quotas, limitations on the number of stock per party, and grazing restrictions. Group size particularly was a restriction that commercial packers say limit their ability to meet the public's need. While in the past packers would service larger organized groups such as church groups and Boy Scout groups, the party size limitation has all but eliminated this type of use. Grazing restrictions have also limited the ability of packers' to provide multiple day full-expense trips. According to one packer, these are the trips that are most popular with the public and represent a significant unmet need. Commercial packers indicate that every year restrictions on their operations require that they turn away clients that they cannot serve, but who nonetheless would fit within one of the need categories identified above.

The logistics of operating in a short season also limits the packer's ability to meet the full need of the public for these services. According to Eastern Sierra Packer's Association President, Dave Donnell, "Everyone wants to take a pack trip during the holidays, weekends, and month of August. We turn away people because we don't have the logistical capacity to handle them and the Forest Service limits how many people we can accommodate with quotas, service days, and other regulations."

Furthermore, there is likely a sizable group of individuals who need commercial packing services and fit into a need category but are unable to afford the service. As discussed in the Final EIS, Economics section, the costs of these trips have escalated over the last several years.

Commercial packers indicate that restrictions, particularly restrictions imposed by the Court, have caused an increase in the price of various services. Commercial packers say that the public has started to balk at the prices of these trips and each year people do not book their trip because they are unwilling or unable to pay the price for the service. It is impossible to determine the number of people that are unable to afford the service each year and "needed" the service to access the wilderness. Given that nearly 90% of current use fits into one of the Need Categories, it is logical to assume a sizable percentage of individuals are unwilling or unable to pay for the escalating price of these services. Still another unaccounted group is those that never make contact with the commercial packers because upon receiving a brochure or some other notification of the price of commercial packing services, they realize that they are unable or unwilling to pay the asking price and they do not pursue the trip any further. It is impossible to determine how many people are in this group, but again it is logical to assume it is a sizable percentage.

Another factor to consider when determining the need for commercial packing services is the relatively short season in which these operations have to operate in. The "need" for packing services will vary from year-to-year, depending on seasonal conditions. In a season such as 2005 that had a lingering snow pack well into July, commercial packers will be limited on the number of people that can be serviced. In other years, the season may start early and end late. The best way to account for these seasonal fluctuations in business is to identify a level of need as a range, rather than settle upon a specific number.

IX. Trends Affecting Need for Commercial Pack Stock Services

This section discusses trends and patterns potentially affecting the need for commercial pack stock services now and in the future.

1. According to *Demographic Change & Recreational Activity Trends* (2005) by Gary T. Green, University of Georgia, and Ken Cordell, US Forest Service, Athens, GA, and Becky Stephens, University of Tennessee:

- Population is rapid growing and some groups will literally explode in numbers.
- Incomes, educational levels, and average life expectancy will all increase by 2020.

2. Association of Partners for Public Lands (APPL) compiled in 2004 from websites, reports, and surveys of members and agency partners reported the following trends and patterns information:

- Consumers are seeking out uniquely different experiences when they travel, yet expect certain standards of destinations, tour companies, lodging establishments and transportation. 65% of travelers are city-dwellers living in urban areas with populations of 500,000 or more. Among those visiting a National Park while traveling in the last five years, 75% stayed overnight or within 10 miles of the parks on their most recent trip. (National Geographic Traveler and Travel Industry Association)
- 50% of American adults have taken an adventure vacation in the past 5 years. (E. Sheffield, California State University, Chico)
- Aging baby boomers seek easier ways of recreating but have more money to spend, resulting in desire for greater conveniences like full hook-up campgrounds. (APPL 2004 agency survey)
- Public lands will see more 55+ visitors and more “escapees” from cities, who will want more services. Many of these visitors will be willing to pay for a quality experience. (APPL 2004 agency survey)
- The population of California is projected to have the largest net increase in U.S. population. By 2020 it is projected to increase by 31% compared to 2000, with a 58% increase in Hispanic population, 55% increase in Asian/Pacific Islanders, a 29% increase in Native Americans, a 20% increase in African Americans, and a 4% increase in persons of European decent. By 2030, Hispanics will comprise 43% of the state’s population. (E. Sheffield, California State University, Chico)
- The median age in 2000 was 35; by 2020 it is projected to be 38. (E. Sheffield, California State University, Chico)
- Baby Boomers are now moving into their retirement years, leading to increased leisure time and greater demands on parks. They are the mobile generation of the next 20 years. (Trends in Demographics and information Technology Affecting Visitor Center Use, NPS, 2003)
- The over-50 population is expected to grow by 18.3 million people over the next ten years. (Independent Sector)
- People continue to live longer. By the year 2025, 60 million Americans will be 65 or older. (Aging Americans: Stranded Without Options)
- Increased urbanization of America, and decreasing rural populations. (APPL 2004 agency survey)

- In 1994-95, more than half of the older population (52.5%) reported having one or more disabilities. One-third had at least one severe disability. Most older persons have at least one chronic condition and many have multiple conditions. The most frequently occurring conditions per 100 elderly in 1995 were: arthritis, hypertension, heart disease, hearing impairments, orthopedic impairments, cataracts, sinusitis, and diabetes. (AARP)

Trend Implications Related to “Need For” Wilderness Commercial Pack Stock Services

Given the trends provided above, the following will likely affect the need for commercial pack stock services in these wildernesses: a population that is increasingly urban, less connected or educated about the outdoor world; significantly growing (especially California) and aging; people less physically fit than the past; and, more often temporarily, if not permanently, physically challenged and limited. The American population’s need for outfitter and guide services will be even more important in the next 10-20 years to enable visitors in need to access and experience their public lands. The Forest Service cannot provide these services to the public to meet this need.

X. Quantifying the Need for Commercial Pack Stock Services in the Ansel Adams and John Muir Wildernesses

It is very difficult—if not impossible—to provide an exact number that captures the total need for commercial packing in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses. This section instead will provide a range that is needed to meet the future need for these services. This range will include a number of components: the current level of need, the need that is not currently being met because of various restrictions that limit the commercial packers’ ability to provide service, and future demographic trends. Based on these three components, current levels of service are not sufficient to meet the public’s current and future need for commercial packing in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses.

Overnight Clients

Current Level of Need

As the 2005 Commercial Pack Client survey showed, approximately 90% of the current level of commercial use is needed to meet the public’s need for these services. Given the 2004 level of 4,015 commercial clients, it is estimated that **3,613** of these clients truly “needed” the service in the context of this Needs Assessment.

Unmet Need

As described in Part VIII, there are a number of factors that act to limit the commercial packer’s ability to meet the full public need for these services. Some of these factors include restrictions and limitations placed on the commercial packers (e.g., group size, quotas, stock number limitations etc.), while other factors include seasonal limitations on business including weather and snow conditions. Additionally, court-ordered restrictions and other factors have caused the prices of these services to rise considerably over the last five years. Based on conversations with commercial packers, it is estimated that there is a need 25-50% above the current level that is not

being met. Discussions with commercial packers are the only way to really get a sense of how much public need is not being currently met. These discussions are compared with the Forests' knowledge of commercial operations and were subject to professional judgment to provide the most accurate assessment of unmet need.

It is estimated that unmet need represents an additional **1,004-2,008** clients that need commercial packing services.

Demographic Trends

Perhaps the most difficult portion of this need quantification involves quantifying the future need for commercial services given the obvious demographic trends. Given demographic trends, there will be an increased need for these commercial services in the future. Exactly how much of an increased need will result from these demographic trends, however, is difficult to determine. Again using professional judgment, it is estimated that demographic trends will result in a 75-100% increase in need over the current level of service that is provided. This gain translates into a range of need from **1,265 to 2,008**.

Overall Need

Given the three components described above, the level of need for commercial services ranges from **7,329 clients to 9,234 clients**. Again, this range is an estimate using professional judgment of some factors that may essentially be impossible to quantify (e.g., unmet need and demographic trends). The need for these services will increase in the future; exactly how much the need will increase is difficult to say; thus the Needs Assessment provides a range of need.

Day Rides

In 2004, there were approximately 4,000 day rides in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses. Again, the term "wilderness day ride" is a bit of a misnomer as the vast majority of these rides only skirt wilderness and do not penetrate very far in the wilderness. Given demographic trends, it is expected that there will be an increase in need for these types of rides. Demographic trends are difficult to quantify, but again it is estimated that these trends will result in a level of need 35-50% above current levels. This results in a range of day ride need of **5,400 to 7,500 clients**.

XI. Extent Necessary for Commercial Services in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses

The results from the 2005 Commercial Pack Client survey indicate that the vast majority of commercial pack stock users are using the service to support activities that are proper for wilderness. Further, the level of need currently provided is likely less than what the public needs to access the wilderness area. Given demographic trends, it is likely that the need for these services will continue to grow in the future. The Needs Assessment has identified a range of need of **7,329 to 9,234 overnight clients**. The day ride need for these wildernesses is estimated to be to **5,400 to 7,500 clients**.

It is the intent of this Needs Assessment to identify the level of commercial services that will meet the public's need for these services. As discussed above, this level is best expressed as a

range. To meet the requirements of the Wilderness Act, the level of need provided must also ensure that wilderness character is maintained in these wilderness areas. The challenge, then, is to settle upon the level that meets the identified range of public need and also protects the wilderness character of the area.

The *Trail and Commercial Pack Stock Management in the Ansel Adams and John Muir Wildernesses Final EIS* provides an analysis and disclosure of the expected environmental effects of six alternatives. These six alternatives provide various levels of commercial packing service along with different mechanisms for controlling that use. The Record of Decision that accompanies the Final EIS will provide the rationale for selecting one of these alternatives. This rationale will include an evaluation of the effect of the selected alternative on the wilderness character of these wildernesses. The ROD will also include a finding of compliance with the Wilderness Act for the selected alternative.

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Attachment 1: 2005 Commercial Pack Client Survey

Currently, the Inyo and Sierra National Forests are analyzing the effects of commercial pack station operations in the Ansel Adams, John Muir, and Dinkey Lakes Wildernesses. A portion of this analysis involves the gathering of information related to the public use of commercial pack stock in the wilderness. Thank you for your assistance.

It would be most helpful if the survey is returned on or before **August 15, 2005**.

1. What wilderness area did you visit on your trip? John Muir Ansel Adams
 Dinkey Lakes Not Sure
 Was this your first visit to a wilderness area? YES NO

2. Please describe the group that went on your pack-supported trip:
 individual
 family
 friends
 organized group
 other (please describe) _____

3. What type of trip did you take?
 day ride
 full service (traveling trip, all expense)
 spot (you ride in with packer and gear to site)
 dunnage (you walk to site, packer takes gear)

4. What was the destination of your trip? _____

5. What was the purpose of your trip (check as many as is applicable)?
 fishing hunting
 access to wilderness setting nature viewing
 horse riding transportation of gear
 family gathering hiking/mountain climbing
 escape from every day routine, relaxation
 other (please identify) _____

6. Why did you choose to use pack and/or riding stock for your wilderness trip?

7. Without commercial services, would you have taken the trip? YES NO
 Please explain

8. Could you have met the purposes of your trip by taking a horse trip outside the boundaries of wilderness areas? YES NO Please Explain
