

ASSESSMENT OF THE NEED FOR OUTFITTER AND GUIDE SERVICES

EAGLE CAP WILDERNESS

Eagle Cap Ranger District
Wallowa-Whitman National Forest

Recommended by _____ Date _____
District Ranger

Approved by _____ Date _____
Forest Supervisor

TABLE OF CONTENTS

A.	INTRODUCTION	<u>Page</u>
	Background and Purpose	
	Geographic Area Covered by Assessment	
	Outfitting and Guiding in National Forest Wilderness	
	Definitions	
	Assumptions	
B.	WILDERNESS MANAGEMENT GUIDELINES	
	Wilderness Management Objectives	
	Possible Guidelines for Determining Need	
C.	CURRENT SITUATION	
	Visitor Use	
	Commercial Outfitters and Guides	
	Institutional Outfitters and Guides	
	Current Authorized Use	
	Other	
	Primary Areas of Concern	
	Current Outfitter and Guide Operations	
	Social Concerns	
	Biological and physical Resource Concerns	
	LAC Standards and Monitoring	
	Public Issues – Scoping of Process	
	Summary of Input	
D.	ANALYSIS	
	Outfitter and Guide Operations	
	Social Resource Concerns	
	Biological and Physical Resource Concerns	
	LAC Standards and Needs	
	Determination of Need	
	Role of Outfitter and Guide Operations	
	Concept of Need for Outfitter and Guide Assistance	
	Statement of Need	
	Evaluation Criteria for Assessing Need for	
	Outfitter and Guide Assistance	

Commercial Operations
Institutional Operations

E. STANDARDS AND GUIDELINES

Use of Criteria for Permit Issuance, Renewal, Modification and Termination
LAC Standards for Outfitter and Guide Operations
Allocation of Capacity by Use, Type and Area
Monitoring and Permit Administration

F. REVIEW OF NEED FOR OUTFITTER AND GUIDE ASSISTANCE

G. OTHER GUIDELINES

APPENDICES

- A. Summary of Visitor and Customer Survey Results
- B. Summary of Public Comments Received
- C. Currently Permitted Outfitting/Guiding Operations
 - Type of Use
 - Season of Use
 - Authorized Use 1991-1996
- D. Evaluation Criteria for Assessing Need for Outfitting/Guiding Assistance
- E. Summary of Evaluation Criteria Rating by Type of Activity

EXECUTIVE SUMMARY

This assessment of the need for outfitters and guides in the Eagle Cap Wilderness (ECW) is driven by requirements based in the Wilderness Act and Forest Service policy. Managers assume that there will continue to be a public demand to visit the wilderness and that some visitors will continue to seek the services of outfitters and guides. It is also expected that applications for additional or expanded outfitter and guide permits will be received and that a set of guidelines would be helpful for managers and applicants to determine the need for the proposed outfitter and guide services.

Objectives for management of the Eagle Cap Wilderness are contained in forest plan direction found in the ECW Stewardship Plan. Guidelines for determining the need for outfitters and guides in wilderness are based on how outfitter and guide services can help meet management objectives for the wilderness. Proposed guidelines for determining needs for outfitters and guides can be categorized as follows: 1) skills and equipment, 2) knowledge, 3) safety, 4) education, 5) wilderness dependency, 6) extent to which existing permits are being utilized, 7) level of use and conflict, 8) populations served, 9) service projects, 10) resource concerns.

Currently 11 commercial and 2 institutional outfitters and guides hold permits to operate in the ECW. Approximately 54% of allocated use days are being used by the current operations. Primary areas of concern for management are crowding which occurs at popular lakes basins and on some day use trail segments during summer weekends and holidays, campsite size and condition, firewood cutting, lack of grazing opportunities in high altitude lake basins, and use of non-weed free supplemental livestock feed. Public input appears to favor some level of outfitter and guide operations but there are concerns for the number of people and animals allowed and there are conflicts between hikers and recreation livestock users.

Because outfitters and guides generate less than 5% of total visitor use, there is little concern for the current amount of outfitter and guide use. Concerns for resource impacts which could be caused by outfitters and guides are difficult to separate from impacts which could be caused by other visitors because no scientific analysis has been done to identify the source of the resource impacts. The role of outfitters and guides in management of wilderness is one of an "unequal partner" in providing needed services to help meet management objectives. The outfitters and guides provide the services determined to be needed by the Forest Service and are managed by the special use permit process. Based on the guidelines for determining need described above, there is an apparent management need for outfitter and guide services in the ECW.

The guidelines for determining need can be used as evaluation criteria for assessing current and future outfitter and guide operations. Based on these guidelines, there is a need for outfitter and guide operations which offer overnight horse and mule, backpacking, or llama trips but less of a need for operations which offer day trips. In addition, opportunities appear to exist to expand or modify operations in some categories for services not currently offered and which better meet all the needs criteria.

The evaluation criteria will be used by the deciding officer as a tool to evaluate outfitter and guide operations. This tool will be applied as a Limits of Acceptable Change standard and used

to continue, expand, or reduce outfitter and guide operations to meet wilderness management objectives. The current freeze on the number of outfitter and guide operations and priority use days will continue until the 1999-season. Allocation of visitor use capacity to outfitters and guides will be done following completion of the Recreation Use and Allocation Analysis prior to the 1999 season. The Recreation Use and Allocation Analysis will consider the use of a "pooled use day" system to allow reallocation of use days within the total amount of use allocated to all outfitter and guide operations. Monitoring of outfitter and guide use and impacts, administration of outfitter and guide permits, and law enforcement action to curtail illegal (unpermitted) outfitters and guides is essential for successful implementation of the guidelines contained in this needs assessment.

To be effective, the guidelines contained in this needs assessment should be reviewed annually, whenever law or policy changes, or whenever significant new data becomes available. These guidelines will be the process used to evaluate the need for outfitter and guide operations. The process should be displayed in a letter or handout and made available to existing and prospective outfitters and guides. After completion of the Recreation Use and Allocation Analysis, a prospectus process will be established for any additional outfitter and guide services.

ASSESSMENT OF THE NEED FOR OUTFITTER AND GUIDE SERVICES EAGLE CAP WILDERNESS

A. INTRODUCTION

Background and Purpose

The Eagle Cap Wilderness Stewardship Plan (ECW Plan) was completed in 1995 and incorporated into the Wallowa-Whitman National Forest Land and Resource Management Plan (forest plan) by amendment. The ECW Plan direction called for the Forest Supervisor to put a moratorium on the issuance of additional special use permits for summer and fall outfitter-guide operations and the expansion of any existing operations in the Eagle Cap Wilderness (ECW). This was done to allow time to assess the need for outfitting and guiding services and to gather accurate data over a three year period (1995-1997) on all visitor use of the wilderness. The promised end result was an assessment of the need for outfitter and guide services in the ECW and a process to guide the issuance, renewal, and termination of outfitter guide permits in the ECW to insure that wilderness values are protected and natural processes are dominating.

During 1995 and 1996, permits have been required for all wilderness visitors and Limits of Acceptable Change (LAC) standards have been monitored to track visitor use. The visitor permit system and other use monitoring will continue through 1997. No new outfitter-guide permits have been issued (except where an existing business has been sold) and no increases in priority use days has been granted to any outfitter and guide operation.

The purpose of this document is: 1) to assess and determine the need for outfitting and guiding services, 2) to provide criteria to be used for issuance, renewal, and termination of outfitter-guide permits as a component of the process of issuing special use permits for commercial and institutional operations, and 3) to establish a process for allocating an appropriate amount of visitor use capacity to outfitter-guide operations. This analysis contained in this document applies only to the Eagle Cap Wilderness.

In preparing this document, other issues regarding outfitters and guides were identified but not considered throughout the analysis because they had no direct connection to whether or not outfitters and guides are needed in the ECW. These issues are: 1) potential problems with existing operations or between permittees, 2) illegal (non-permitted) operations, 3) more effective monitoring of outfitter and guide itineraries, and, 4) more on the ground administration of outfitter and guide operations. These issues will be addressed by the Forest Service through permit administration or law enforcement activities.

This document is not an analysis of the environmental effects of existing or proposed commercial or institutional outfitter and guide operations. Analysis of environmental effects, in compliance with the National Environmental Policy Act (NEPA) is completed on a case by case basis when permits are issued or renewed.

Geographic Area Covered By Assessment

The Assessment Area includes all National Forest land in the Eagle Cap Wilderness.

Outfitting and Guiding in National Forest Wilderness

The Forest Service issues outfitter and guide permits in wilderness in order to respond to a management need to provide high quality public services and assistance to the wilderness visitor and to meet wilderness management objectives. Outfitter and guide permittees exist because the Forest Service desires their assistance in accomplishing management goals and objectives.

Outfitter and guide permittees are an agent to provide services to the public, protect public health and safety, and attain management objectives specifically related to the type and kind of experiences defined in Forest Plan standards and guidelines. The Forest Service relies on outfitters and guides to help address the needs of an increasingly urban population which may lack the necessary ability, skills, or equipment for wilderness travel, environmental learning, or other wilderness dependent visits. The Forest Service also recognizes that in order for an economically viable business to be able to offer quality professional services to the public on a continuing basis, outfitters and guides need reasonable assurances of future service day levels, growth opportunities, if any, and other factors, to the extent that can be achieved with existing laws and policies. The relationship between the Forest Service and an outfitter should be one of an "unequal partnership", with the details spelled out in the Special Use Permit. The Forest Service retains the responsibility and authority to continue, reduce, or expand outfitter and guide operations, and administer outfitter and guide permits, to meet wilderness management objectives.

Issuance of an outfitter and guide permit requires a 5 step process:

1. Determination of a demonstrated management need has been completed and documented by the Forest Service.
2. The issuance proposal has been fully evaluated and the appropriate NEPA analysis/ documentation had been completed.
3. The analysis and decision has been documented and linked to the Forest plan.
4. The bid prospectus process has been followed for solicitation of applicants, evaluating competition and providing required documentation/information on applicants.
 - a. Applicant has proven financial capability and possesses adequate experience/ expertise to operate a successful sustainable business.
 - b. The most highly qualified applicants) has been selected via a formal documented applicant selection/use allocation process.

5. The permit is issued consisting of:
 - a. The basic permit (either annual or five year term)
 - b. Annual operating plan

General direction on the issuance of O&G permits is contained in Forest Service Handbook (FSH) 2709.11 and Forest Service Manual (FSM) 2320.13g.

Management need is not determined by market demand or by a prospective outfitter or guide's desire for a permit. Determination of management need for outfitting and guiding is similar to the determination of management need for any other resource or service (the number of cows to graze, the number of trees to harvest, etc.). The agency determines the need based on mission, goals, objectives, and resource capability; and makes outfitter and guide allocations to attain those goals and objectives by area based on resource capability.

The requirement to assess the need for outfitting and guiding services before issuing Special Use Permits for outfitting and guiding operations is established in the following:

The Wilderness Act of 1964 (Public Law 88-577), which states: "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."

The Code of Federal Regulations, 36 CFR 251.54 (i), which states in part: "An authorized officer may deny issuance of an authorization for all other special uses if that officer determines: (1) The proposed use would be inconsistent with the purposes for which the lands are managed, or with other uses; or (2) The proposed use would not be in the public interest."

Forest Service Manual 2323.12, which states in part: "Consistent with management of wilderness, permit outfitter and guide operations where they are necessary to help segments of the public use and enjoy wilderness areas for recreational or other wilderness purposes."

Forest Service Manual 2323.138, which states in part: "Address the need for and role of outfitters and guides in the Forest Plan. The plan must address the type, numbers and amount of recreational use that is allocated to outfitter guides. Ensure that outfitters provide their service to the public in a manner that is compatible with use by other wilderness visitors and that maintains the wilderness resource."

Forest Service Manual 2323.14, which states in part: "Plan and manage public use of wilderness in such a manner that preserves the wilderness character of the area. Provide

for the limiting and distribution of visitor use according to periodic estimates of capacity in the forest plan.

Forest Service Manual 2323.38, which states in part: "The Wilderness Act requires managers to search for a balance between preserving the wilderness resource, by protecting natural ecological processes that can cause plant and animal populations, or ranges, to change, while at the same time making the resource available for visitor use and enjoyment. To do both, it may be necessary at times to limit visitor use to insure that human influence does not impair natural wildlife or fish populations or their habitat."

Forest Service Manual 2712.2, which states in part: "When careful multiple use or functional planning indicates a concession opportunity is available and there is a demonstrated public need for the service, make every effort to obtain the best qualified permittee as well as an equitable return to the United States."

Forest Service Manual 2721.53, which states in part: "Require all private parties conducting outfitter-guide activities on national forest land to have a Special Use Authorization."

Forest Service Handbook 2709.11 (Section 41.53f), which states in part: "Outfitting and guiding permits may be issued when one or more of the following occurs: (1) An increased allocation, capacity or public need is identified through the forest planning process," and "Issue and administer special use permits for outfitter-guide activities to: 1. Meet general public recreation service needs identified through forest land and resource management planning."

Wallowa-Whitman National Forest Land and Resource Management Plan which states in part: "Authorize and permit outfitter and guide operations where Forest Service Manual 2720 criteria are met and when supported by an environmental analysis" (page 4-32), and "Outfitter guide services will continue" (page 4-64).

This assessment of the need for outfitting/guiding assistance will not totally address the Forest Service Manual 2323.138 requirement to determine the type, numbers and amount of recreational use that is allocated to outfitter guides in Wilderness. Rather, this assessment will determine the need for outfitter-guide services, identify the criteria to be used for permit issuance, renewal, or termination, and establish a process to allocate a percentage of the total use to outfitter-guides. The actual amount of use appropriate for each travel zone and the percentage available for outfitters and guides will be determined in the Recreation Use and Allocation Analysis to be completed after this needs assessment.

Definitions

Following are definitions for key terms used in this document and sources of the definitions:

Commercial Use	Any use or activity on National Forest System Lands (a) where an entry or participation fee is charged, or (b) where the primary purpose is the sale of a good or service, and in either case, regardless of whether the use or activity is intended to produce a profit. (36 CFR 251.51)
Commercial Outfitter	Operations which are managed as an outfitting/guiding business and whose services are available to the general public. This category can include outdoor schools and similar operations, even though they may be Not For Profit Operations. This category is eligible for Priority Use Service Days.
ECW and ECW Plan	Eagle Cap Wilderness and the Eagle Cap Wilderness Stewardship Plan. The ECW Plan is an amendment to the Wallowa-Whitman National Forest Land and Resource Management Plan (Forest Plan).
Group Use	An activity conducted on National Forest System lands that involves a group of 75 or more people either as participants or spectators. (36 CFR 251.51)
Guiding	Providing services or assistance (such as supervision, protection, education, training, packing, touring, subsistence, interpretation, or other assistance to individuals or groups in their pursuit of a natural resource-based outdoor activity) for pecuniary remuneration or other gain. (Forest Service Handbook 2709.11, Section 41.53c)
Holder	An applicant who has received a special use authorization to conduct outfitting or guiding activities. (Forest Service Handbook 2709.11, Section 41.53c)
Incidental Use	Annual use that is proposed to be 50 service days or less and is anticipated to have little or no significant impact on public health or safety, the environment, or other authorized uses and activities. (Forest Service Handbook 2709.11, Section 41.53c)
Institutional Outfitters (non-school)	Operations which are not managed as an outfitting/guiding business, but which offer outfitting/guiding type services where an entry or participation fee, that exceeds the cost of shared expenses, is charged. Services are provided to members of the organization or to a limited constituency. Includes religious, conservation, environmental, youth, fraternal, service, military, county and city outdoor recreation programs and social groups. This category is not eligible for Priority Use Service Days.

Institutional Outfitters (school)	Operations which are not managed as an outfitting/guiding business, but which offer outfitting/guiding type services where an entry or participation fee, that exceeds the cost of shared expenses, is charged. Participation in programs may or may not be recognized for credit toward graduation or a degree. Includes schools, colleges or universities, institutes, or groups operating under their umbrella. Must be certified as an educational institution. This category is not eligible for Priority Use Service Days.
Lakes Basin Management Area (LBMA)	A concentration of popular, high altitude lakes and scenic peaks which is relatively easily accessible in the center of the ECW. Management has developed special regulations and emphasis for this area.
Limits of Acceptable Change (LAC)	LAC is a wilderness management process that allows for recreation use within guidelines designed to maintain or improve wilderness conditions. The process assumes that any amount of use will cause impacts. The LAC standards use measurable indicators to set a level that is the limit of change that can occur before natural processes no longer dominate and wilderness conditions are degraded.
Management Need	A need identified by the Agency which is deemed essential, beneficial, desirable, or required for the well-being of the public; and in the public interest; in order to meet the intent of the Agency mission to provide high quality public recreation services, to provide for public health and safety, to provide for management and protection of natural resources, as well as attainment of wilderness goals and objectives. (Barker's Bible on Outfitting)
Noncommercial Use	Any use or activity that does not involve commercial use. (36 CFR 251.51)
Outfitting	Providing through rental or livery any saddle or pack animal, vehicle or boat, tents or camp gear, or similar supplies or equipment, for pecuniary remuneration or other gain. (Forest Service Handbook 2709.11, Section 41.53c)
Priority Use	Authorization of use for a period not to exceed five years. The amount of use is based on the holder's past use and performance and on Forest Land and Resource Management Plan allocations. (Forest Service Handbook 2709.11, Section 41.53c)
Pecuniary Remuneration	To pay for a service. (Webster's New Collegiate Dictionary)
Service Day	A day or any part of a day on National Forest System lands for which an outfitter or guide provides goods or services, including transportation, to a client. (Forest Service Handbook 2709.11, Section 37.05)

Special Use	All uses of National Forest System lands, improvements, and resources, except those provided for in the regulations governing the disposal of timber, minerals and the grazing of livestock. (36 CFR 251.50)
Temporary Use	An amount of use assigned the holder of a permit with a period of one season or less. (Forest Service Handbook 2709.11, Section 41.53c)

Assumptions

The following assumptions are made to aid in the assessment of the need for outfitting/guiding operations:

- Overall visitor use is likely to continue to increase but there may be shifts in use patterns (timing and location), user type (hiker, stock, etc.), or origin of users (where they live).
- Public and/or political pressure to modify enabling legislation or localize wilderness management may increase, especially from non-users. Outfitter and guide operations may be used to facilitate wilderness visits and an understanding of wilderness for people who, because of location of residence, race, age, disability, or other reason, would not otherwise typically experience wilderness.
- There will be a continued and increased demand for special use permits to conduct outfitting/guiding operations on National Forest System lands in the Eagle Cap Wilderness
- A set of guidelines which define the need for outfitters and guides in the ECW would be useful for managers, outfitters and guides, prospective applicants, and the general public for understanding the outfitter and guide program.
- Conflicts between outfitting/guiding operations and non-outfitted users have the potential to increase if overall use increases.
- The State of Oregon may pass legislation or establish policies requiring the Oregon State Marine Board or other state agency to regulate outfitters and guides in a manner different than the present situation.

B. WILDERNESS MANAGEMENT GUIDELINES

Wilderness Management Objectives

These are the standards and guidelines for wilderness use, condition, and management that have been established in the Eagle Cap Wilderness Stewardship Plan (ECW Plan) which is Amendment #16 to the Wallowa-Whitman National Forest Land and Resource Management Plan (forest plan). The standards and guidelines have been established to meet the intent of law (the Wilderness Act) and Forest Service policy.

1. To preserve the natural conditions and outstanding opportunities for solitude represented in the wilderness on the forest (forest plan).
2. To manage the wilderness under a non-degradation principle which seeks to maintain the wilderness in at least as wild a condition as it was at the time of classification. The non-degradation principle applies to all values of wilderness: biophysical and social (ECW Plan).
3. Conditions are improved in situations where natural processes are not now operating freely or where any of the values for which the wilderness was created are impaired (ECW Plan).
4. An appropriate level of diversity in the wilderness experience and an inherent wilderness character is provided for visitors. This diversity of experience includes travel on system trails of varying difficulty and intended use, travel off trails, day use, overnight use, and other opportunities to experience primitive, unconfined, and uncrowded recreation with a degree of challenge and risk. The evidence of human activity and impact, and the overall characteristics of the area vary by Wilderness Resource Spectrum Class (ECW Plan).
5. Displacement of recreation use and impacts does not occur from areas of high use to areas of low use within the wilderness for the purposes of accommodating more visitors (ECW Plan).
6. Visitor activities are restricted only where necessary to preserve and protect the wilderness resource and within this context there is an emphasis on providing outstanding opportunities for solitude and primitive forms of recreation (ECW Plan).
7. Specific standards and guidelines for management of the wilderness are spelled out as Limits of Acceptable Change (LAC) for each of the biophysical, social, and managerial elements (ECW Plan).
8. The ECW Plan provides the following specific direction relating to outfitting and guiding:
 - a) "Manage the number and type of outfitter operations to meet wilderness management objectives"
 - b) "If use limits are necessary, limit outfitter use at the same rate as non-outfitted visitor use."
 - c) "Determine use days permitted to outfitter-guides to meet Forest Service Manual requirements, as needed to meet wilderness objectives, following completion of visitor use monitoring."

- d) "Limit the number of permitted horse/mule and backpacking permits and the use days associated with those permits to the level permitted in 1994, until an outfitter-guide need and allocation analysis is completed using information obtained from the visitor permit system."
- e) Complete an outfitter-guide need analysis and a use allocation analysis, to meet Forest Service Manual requirements, prior to the 1999 summer season."

Possible Guidelines for Determining Public Need for Outfitters and Guides

The following criteria are generally accepted in management of the National Wilderness Preservation System for evaluating whether and how well outfitters and guides are providing services which help meet the management objectives for the wilderness:

1. Skills and Equipment - Outfitting/guiding skills and equipment are needed by a portion of the public because of one or more of the following:
 - a. Specific skills required for activities appropriate for the area require substantial time and/or talent to learn.
 - b. Learning necessary skills and participating in the activity requires acquisition and consistent use of expensive, specialized equipment for which the public could not, or normally would not, expend the dollars or time.
 - c. The skills required are so unique that outfitting/guiding assistance is almost a prerequisite if the public is to have any opportunity to participate in and enjoy the activity.
2. Knowledge - Outfitting/guiding knowledge of the resources within the activity area and the activity itself is needed by the public, especially those who are not familiar with the area, in order to enjoy recreational opportunities in a manner that reduces resource damage and user conflicts. This includes knowing where and by what method to best access, travel through, and camp in an area.
3. Safety - Outfitting/guiding special skills and equipment are needed to assure a reasonable level of safety, in a wilderness setting, for the participants. Without outfitter assistance; members of the public could seriously endanger their health or lives or would not visit the wilderness due to safety concerns. This could apply to people who use outfitter and guide services for their first wilderness trip and then visit on their own, or it could apply to an activity such as technical climbing where extreme hazards exist for those who are inexperienced and ill-equipped. This criteria is not meant to diminish the wilderness values of self-reliance or the opportunity to challenge oneself or experience a degree of risk.

4. Education - Outfitting/Guiding assistance is needed to:
 - a. Provide historical, prehistoric, or interpretive information that can only be experienced in this wilderness.
 - b. Provide educational trips focusing on a specific resource or condition found only in this particular wilderness.
 - c. Provide for educational experiences where the primary focus of the trip is to teach or certify visitors in the use of techniques and equipment designed specifically to minimize wilderness impacts.

5. Wilderness Dependency - The extent to which the proposed service can be offered on private or non-wilderness national forest lands. Some examples of these services could be:
 - a. Outfitted supported camps more than a days' easy hike from a road.
 - b. Trips in which solitude and unconfined, primitive recreation are the central components of the experience.
 - c. Visits to ecosystems, geological, or physical resources found only in wilderness for recreational, scientific, or educational purposes.

6. Utilization of Existing Permits - The extent to which already authorized use days or capacity exists for existing permittees to fulfill the need.

7. Level of Use and Conflict - The compatibility of commercial, institutional, and general public use, and the amount of use and social capacity within a given area of the wilderness. The recreation use indicators are measured against the LAC standards. Additional outfitter and guide use days are not granted where LAC standards are exceeded or where a trend suggests that standards will be exceeded. Outfitter and guide use levels may be reduced from current levels, along with all visitor use, in areas where LAC standards are exceeded.

8. Populations Served - The extent that services are offered and provided to people in need of assistance to visit the wilderness such as:
 - a. Senior citizens
 - b. People with disabilities

9. Resource Concerns - The amount of interference an outfitter/guide operation will have with the natural biological and physical processes of the wilderness. The biological and physical resource indicators are measured against the LAC standards. Additional outfitter and guide use days are not granted where LAC standards are exceeded or

where a trend suggests that standards will be exceeded. Outfitter and guide use levels may be reduced from current levels, along with all visitor use, in areas where LAC standards are exceeded.

The following guidelines have been identified as possible additional factors in determining the need for outfitter and guide operations in the ECW.

Populations Served

Non-typical wilderness visitors

The non-typical wilderness visitor is defined as one who does not fit into the profile (as defined by two research studies in 1965 and 1993) of the majority of people who visit the ECW. The profile of the typical wilderness visitor is one who is white, male, fairly well educated (at ~least some college), between the ages of 25 and 54, and has an income greater than \$35,000 per year.

Outfitter and guide services can be used to assist the non-typical wilderness visitor to experience and appreciate the wilderness. This benefits the wilderness by helping to build understanding and support for the management and legal existence of wilderness over the long term.

Service Projects - The type and number of projects that could potentially be accomplished by visitors who are supported by outfitters such as:

- a. Trail maintenance
- b. Campsite or trail restoration
- c. Trail bridge repair, construction or removal
- d. Trash pickup, abandoned equipment removal

The need for service projects to be accomplished in wilderness by volunteers is becoming more apparent as Forest Service budgets for trail maintenance and wilderness management are reduced. Outfitter and guide services can be used to support these activities.

C. CURRENT SITUATION

Visitor Use

The Eagle Cap Wilderness is a popular place for those who enjoy wilderness. Approximately 65% of visitors come from outside of the counties surrounding the wilderness (Baker, Union, Wallowa) and most originate in western Oregon. About 25% of all visitors use recreation livestock but nearly half of this use is from local counties. Data from the 1995 visitor permit analysis indicates that overnight use is concentrated in the popular destination areas of the Lakes Basin Management Area (LBMA) and other high altitude lake areas during weekends and

holidays in July and August. Day use on summer weekends and holidays is concentrated on the Wallowa River, Hurricane Creek, and Lostine River trails. During the fall season use is concentrated in the lower elevation valleys. There is no data to suggest that use exceeds LAC standards during the fall season.

Although accurate visitor use data from years previous to 1993 is not available, an analysis based on informal data seems to indicate that overall use has increased but that overnight use is down and day use is up. This perception is confirmed by results from monitoring of trail encounters and occupied campsites. This shift in use pattern partially explains why LAC Standards may be exceeded at times for encounters with other groups on the first few miles of trails from the most popular trailheads. However, the LAC standards for encounters also appear to be exceeded, at times, on trail segments within popular destination areas in the interior of the wilderness. LAC standards for occupied campsites are exceeded, at times, at a few of the most popular destination lakes during the summer season. Visitor use data and monitoring information accuracy is poorest for the fall use season due to poor permit system compliance by visitors and lack of Forest Service monitoring efforts.

1. Commercial Outfitters and Guides

Currently there are 11 commercial summer/fall outfitters and guides under permit to operate in the Eagle Cap Wilderness. (See Appendix C for a list of outfitters and guides, the services they provide, and their seasons of use.) Of this group, two use llamas, one offers backpacking trips, and the rest use horses and mules. The outfitters and guides offer a variety of services including equipment and recreation livestock rental, guide service, fully outfitted trips, and drop camps. The llama and backpacking outfitters operate primarily in the summer while the horse and mule outfitters operate in the spring, summer and fall. (There are also two winter backcountry ski outfitters and guides under permit to operate in the ECW. The needs for these services and allocation of use capacity to winter outfitters and guides will be considered in a separate winter recreation analysis.)

Outfitters and guides are permitted to operate and have camps anywhere in the wilderness during the summer season. However, the Forest Service monitors outfitter and guide itineraries, and will require changes in trip plans, if necessary to minimize the scheduling of trips during times and in areas of peak use and to avoid conflicts between outfitters. For the spring and fall hunting seasons, outfitters and guides have mutually agreed with the Forest Service on assigned hunting and camping areas. Some outfitters pay an additional fee to have reserved campsites included in their permits.

Appendix C displays outfitter and guide use and allocated service days for the 1991 through 1996 seasons. In general, permitted outfitters and guides are reporting that they utilized about 54% of their allotted days during the last full season of reporting (1995). In 1995, one outfitter used all the allotted service days, eight used less than all their allotted service days, and two used more than their allotted service days. Analysis of 1995 visitor use data by travel zone indicates that some summer outfitting and guiding is occurring in areas and at times that exceed LAC standards for visitor use. This occurs in the popular Lakes Basin Management Area (LBMA) and

other high altitude lake destinations, and on popular day use trails at various times throughout the summer.

Since the 1995 moratorium, several outfitters and guides have asked for increases in their allotted service days and 3 operations have been sold to new owners. Each year an average of 6 inquiries and or applications are received for new outfitter or guide permits. Forest Service administration of existing outfitter and guide permits has been minimal due to budget constraints.

2. Institutional Outfitters and Guides

Currently there are 2 outfitters who hold institutional permits. (See Appendix C for a complete list of outfitters and guides and use days.) One permit is to a college outdoor recreation program and the other is to an urban parks and recreation department. Reported use in 1995 and 1996 has been equal to the allotted service days for both these permits.

Each year inquiries and permit applications are received from schools, churches, and other organizations for new outfitter or guide permits. Forest Service administration of these permits has been minimal per the forest budget advice.

3. Current Authorized Use

Of the 11 commercial summer and fall outfitting/guiding operations in the ECW, all but two have all their service days authorized as priority use in their permits. The two institutional outfitters and guides do not have priority use days. Total authorized commercial and institutional outfitter and guide use is 7,219 service days, which is less than 5% of the total ECW visitor use. This use is authorized in the following activity categories:

Horse/mule packing	5622	78 Percent
Commercial Backpacking	824	11 Percent
Llama packing	623	9 Percent
Institutional Backpacking	150	2 Percent

4. Other

Each year the Forest Service receives reports of apparent illegal (unpermitted) commercial and institutional outfitter and guide operations. Whenever possible, law enforcement actions are taken to identify, discourage, and prosecute violators. In many cases information on illegal activities is inadequate or budget and personnel is insufficient to pursue the investigation.

Primary Areas of Concern

1. Current Outfitter and Guide Operations

Management has identified one concern that pertains to determining the need for outfitter and guide operations. Current permitted operations may not reflect all the needs necessary to support

management objectives for the wilderness. While existing permittees meet some of the objectives, and provide services needed by some visitors, there may be a need for outfitters and guides to assist in accomplishing other wilderness management objectives in the future.

In addition, there is also a concern that not all allocated permit days are being used. It would appear that there should be an adjustment in the allocation of use days to individual outfitters to better reflect their market share and to make available excess use days to help meet other wilderness objectives. This adjustment, if necessary, will be made through the permit administration process and after completion of the Recreation Use and Allocation Analysis.

2. Social Concerns

The main concerns identified with outfitting and guiding operations have arisen from operations in heavy use areas during the summer season. The social resource concerns are conflicts with the non-outfitted public, and potential crowding in some places at some times. User conflicts are identified through the use of visitor surveys, public meetings, and requests for public input (project scoping notices) placed in the media and monitored by wilderness rangers in the field and . Some of the conflicts and impacts attributed to outfitters and guides might be the result of some visitors perceiving that any larger party they encounter is being served by an outfitter or guide operation. This is particularly true for larger horse parties.

The concern for crowding is primarily for overnight use in the LBMA, and other high altitude lake destinations, and day use on the first few miles of the Wallowa River, Hurricane, and Lostine River trails on some popular during summer weekends and holidays. These areas receive the highest amount of non-outfitted visitor use and some outfitter and guide use. The level of use and crowding is monitored through the visitor permit system and by wilderness rangers on the trails and in camping areas. A preliminary analysis of data indicates that LAC standards are exceeded at times. Managers believe that if no changes occur in visitor use patterns or management actions, crowding in the LBMA and similar areas will continue whether outfitters and guides are operating in these areas or not. Therefore, some type of management action, such as use limits for all visitors, may be required in the future, at least in the areas and at times when the LAC standards are exceeded.

While limiting use in the LBMA and similar areas may sound drastic, it should be noted that managers have already tried a variety of other management measures. These measures are listed as management options in the ECW Stewardship Plan. In the LBMA regulations are in force to setback campsites and campfires from lakes, ban campfires at some lakes, prohibit grazing and tying of stock near lakes and in campsites, and restrict the overnight group size to half of what it is elsewhere in the wilderness to help insure that LAC standards are met.

3. Biological and Physical Resource Concerns

Biological and physical resource concerns include the perceived impacts from recreation activities on the vegetation, soil, and water, resources, potential impacts on fish and wildlife

species and habitat, a lack of livestock forage in some high altitude areas, the existence of larger than standard campsites in poor condition, the cutting of trees for firewood, and the use of non-weed free supplemental feed. Managers consider biological and physical resource concerns associated with outfitter and guide operations as perceived because no analysis has been done to differentiate outfitter and guide impacts from those of other wilderness visitors. For example, many campsites that are used by outfitters and guides are also used by other visitors.

4. LAC Standards and Monitoring

All recreation use of the wilderness causes impacts or a change in the condition of the wilderness. The ECW Plan defines the Limits of Acceptable Change (LAC) for the different elements of the social, biological, and physical environment. The LAC principle allows visitors to enjoy the wilderness while defining when impacts cause a deterioration in natural conditions and processes. When LAC standards are reached managers are required to take action to reverse the trend. The ECW Plan directs that the LAC standards apply equally to all visitor caused impacts whether outfitters and guides are utilized or not.

Monitoring of the areas of concern for outfitter and guide use and impacts should be accomplished concurrently with monitoring of LAC standards for all recreation impacts in the wilderness. Since implementation of the ECW Stewardship Plan began, budget constraints have not allowed sufficient monitoring or identification of resource concerns specific to outfitter and guide operations.

Public Issues

1. Scoping Process

In May, 1996 a meeting was held with all permitted summer and fall outfitters to describe the planning process and timeline for this project.

In November and December, 1996 a survey (sponsored by Utah State University) was distributed to wilderness visitors who used the services of a commercial outfitter or guide in 1996 and to a randomly selected portion of wilderness visitors who did not use an outfitter or guide. This survey had been previously reviewed by all permitted commercial outfitters and guides.

Also in November of 1996 and again in February of 1997, a request for comments was circulated within the Forest Service to resource specialists and others who have an interest in the ECW or outfitters and guides.

In February, 1997 a news release was sent to all print and electronic media on the forest contact list that described the project and requested input. A letter, containing the same information as the news release, was sent to all those on the Eagle Cap Ranger District list of interested parties, outfitters and guides, and appellants of the ECW Stewardship Plan. Survey Results and a request

for further comment were sent to all Outfitters and Guides and to those survey respondents who previously indicated they wanted the results or desired to participate further.

In February 1997 a public meeting was held with commercial and institutional outfitters and other interested parties to discuss the results of the survey and the criteria for determining need.

In March of 1997 a second public meeting was held with commercial and institutional outfitters and other interested parties to discuss the draft Needs Assessment and Evaluation Criteria. The process for measuring visitor use against social and biophysical capacity and LAC concerns, and the process of allocating a portion of the total visitor capacity to outfitters and guides was also discussed.

2. Summary of Input

Summary of Outfitter Meeting in May 1996

A discussion was held to explain the needs and allocation analysis process and the survey of outfitter and guide customers and other wilderness visitors. Those present asked to be able to review and comment on the survey before it was sent out. In October 1996, draft copies of the surveys were sent to all permitted outfitters along with a request for their customer lists. Comments on the survey were received from one outfitter and incorporated into the final version. All outfitters except one submitted their customer lists for the mailing.

Summary of Response to Surveys

A total of 262 surveys were mailed to outfitter and guide customers. The results of the survey are displayed in Appendix A. In general, the majority of outfitter and guide customers surveyed (95%) favor some level of outfitter and guide operations in the ECW and are not displeased with the existing permittees and the services they provide. Many of the needs for outfitters are similar to those listed in Section B., Possible Guidelines for Determining Public Need for Outfitters and Guides.

A total of 261 surveys were mailed to wilderness visitors who did not utilize the services of an outfitter or guide. The results of this survey are displayed in Appendix A. In general, most visitors have not used an outfitter or guide but 49% favor some level of outfitting and guiding in the ECW. While some respondents made negative comments regarding the need for outfitters and guides, most were not displeased with observed outfitter and guide activities and identified needs for outfitters and guides similar to those listed in Section B., Possible Guidelines for Determining Public Need for Outfitters and Guides.

Summary of Response Received from Scoping

A summary of comments received from February, 1997 News Release, public mailings, personal contacts, and the February, 1997 Public Meeting can be found in Appendix B. In general those who attended the meeting were in favor of continuing outfitter and guide operations in the ECW

but have some concerns about how the operations will be continued, reduced, or expanded. There were no comments expressed at the meeting that indicated that there is no need for outfitters or guides in the wilderness or that the level of outfitting and guiding should be reduced.

A total of 8 letters and one personal visit were received. Three letters and the personal visit favored continuing outfitter and guide operations. Two letters favored adding a type of outfitter and guide operation (day hikes) not currently available. One letter questioned the distinction between commercial and institutional operations and one was concerned that non-commercial groups were being denied access. One letter expressed the opinion that few outfitters should be needed to really meet management objectives. One other letter said that the numbers of people and animals have deteriorated wilderness conditions and that the Forest Service should further restrict use rather than the number of outfitters.

Summary of Response to Draft Needs Assessment

A summary of Comments Received during March, 1997 Public Meeting, will be found in Appendix B. In general, those who attended the meeting had specific questions about how the needs evaluation criteria would be interpreted and applied and how the criteria could be met. There was no opposition to the determination of need for outfitters and guides in the ECW.

One letter was received with comments on the draft. The writer questioned doing the Needs Assessment before the Recreation Use and Allocation Analysis, and expressed concern over a perceived bias of the Forest Service towards the outfitters and guides which are labeled as a special interest group. The writer also feels that the only need for outfitters and guides is to serve the disabled and aged and that it would be a blunder for the Forest Service to allocate a percentage of the recreation capacity to outfitters and guides. The writer also indicates that the wilderness should be experienced on it's own terms and that management should favor those who will gain the most from the visit.

Copies of all internal and external input received can be found in the analysis file for this project.

D. ANALYSIS

Outfitter and Guide Operations

There is an opportunity to restructure the ECW outfitter and guide program to better meet the needs for management of the wilderness. Current outfitter and guide operations provide services that meet many, but not all, of the needs. Therefore, existing operations which meet most of the needs guidelines should continue but outfitter and guide services are also needed to support visitors interested in education or service projects as the primary focus of their trip and there is a need to provide a means for non-typical populations to visit the wilderness.

Social Resource Concerns

It is unlikely that most visitors can tell the difference between an outfitter and guide group and a larger than average private party when trail encounters occur. Therefore, much of the concern about outfitter and guide operations probably reflects user conflicts between recreation livestock users and hikers, rather than a concern directly related to the need for outfitters and guides in the ECW or the level of outfitter and guide use.

Because current overall outfitter and guide use is less than 5% of total use, there is no issue with over use of the wilderness by outfitters and guides in general that is applicable to determining the need for outfitters and guides in the ECW. However, there is a need to address the timing and location of all visitor use, including outfitter and guide use, to insure that LAC standards are not being exceeded. This will be addressed in the Recreation Use and Allocation Analysis.

Biological and Physical Resource Concerns

Resource concerns relevant to this analysis are defined as those impacts to the biological and physical environments which could be caused by outfitter or guide operations. Resource concerns specific to outfitter and guide operations are not easily separated from those related to all visitor use of the wilderness. While outfitter camps and outfitted and guided groups are monitored by the Forest Service as part of the permit administration process, there has been no scientific effort to compare impacts from visitors using outfitters and guides versus those who don't.

Indeed, a general conflict appears to exist between resource specialists on this issue. Some feel that outfitters and guides, because they frequently bring in groups which exceed the average group size (but not the maximum group size limit) and tend to use the same camps repeatedly, may be causing resource impacts. Others feel that outfitters, who may use the same camps repeatedly, help limit impacts by confining them to a few well located sites and that outfitters have better skills, equipment, and knowledge which allows them to minimize impacts.

LAC Standards and Needs

There is legitimate concern for some LAC social standards in the summer and some LAC biological and physical resource standards in the summer and fall. However, research tells us that any recreation use of the wilderness will cause some impacts. Outfitter guide use is a very small percentage of total use and it is not possible at this time to tie the cause of these concerns and impacts entirely to outfitter and guide operations. Clearly, these concerns and impacts would likely exist even if no outfitters and guides were operating in the ECW. Therefore, social, biological, and physical resource concerns cannot be used, at this time, for determining the overall need for outfitters and guides. The LAC standards for social, biological, and physical resource concerns can be incorporated into the evaluation criteria to help determine the need for a specific type of outfitting and guiding or a specific operation proposal. These evaluation criteria are described in Section B, above, as 7. Level of Use and Conflict, and 9. Resource Concerns. Using these evaluation criteria to determine need helps insure that wilderness conditions are within LAC standards.

Determination of Need

a. Role of Outfitting and Guiding Operations

A first step in developing evaluation criteria to assess the need for outfitting and guiding assistance is to define the role of outfitting and guiding operations in wilderness. From the agency perspective, a "unequal partnership" with the outfitting and guiding industry can be used to provide certain recreation services as a way of meeting wilderness management objectives. It is important to understand the term "unequal partnership" as used in this context. The Forest Service retains authority and responsibility to issue, modify, and terminate outfitter and guide permits. The outfitters and guides help ensure that quality recreation, education, and other services are provided in wilderness to those segments of the public which require outfitting and guiding services. The "unequal partnership" is therefore, a joint effort to meet wilderness management objectives. This is the "management need".

b. Concept of Need for Outfitter and Guide Assistance

Neither an applicant's desire to conduct outfitter and guide operations nor solicited calls or letters by an applicant constitute a need for outfitter and guide assistance. And, absence of use or demand by the non-outfitted public is not, in itself, justification to authorize outfitter and guide operations.

The justification for authorizing outfitter and guide operations is proportional to the public's need for outfitter and guide assistance within the context of management's need to meet wilderness management objectives. Where there is a high need for outfitter and guide assistance, there is more justification for assigning outfitter and guide operations a greater share of the use opportunities. Where the need for outfitter and guide assistance is low, there is less justification for authorizing new or additional outfitter and guide opportunities; particularly where overall use

levels are high, conflicts with the non-outfitted public occurs, or resource conditions are currently outside the LAC standards.

The relative public need for outfitter and guide assistance ranges from high to low based on the type of activity. The high need category includes activities in which significant portions of the public would not be able to participate in the activity without outfitter and guide assistance due to level of skill or knowledge, type/cost of equipment, safety considerations or because a unique service is provided. It could also include more specialized activities to meet education goals, accomplish service projects, or serve special populations.

The moderate need category includes activities where, while level of skill or knowledge, type/cost of equipment, safety considerations or uniqueness of service provided is important, a significant amount of use is already occurring without outfitter and guide assistance. However, the public could benefit from outfitter and guide assistance by being able to enhance skills, develop conservation ethics, and practice low impact techniques when recreating, learn about wilderness, or perform service projects.

A category of services which is not needed includes all activities where the role of the outfitter and guide operation is to provide a secondary service to a customer who is not looking for a wilderness experience; or where a customer is transported to a well known, very accessible, heavily used area; or where the activity could occur outside of wilderness.

c. Statement of Need for Outfitter and Guide Assistance

Based on the Wilderness Management Objectives and Guidelines for Determining Need as described in Section B, the public input received, and identified management concerns, there is an apparent need for outfitter and guide services in the ECW. This need is not based on public demand or the economic interests of local businesses. It is based on the opportunities to: 1) provide wilderness experiences for those who cannot or will not otherwise visit due to age, disability, location of residence, lack of equipment, or lack of expertise, 2) to enhance those experiences with education about resources found only in wilderness and proper use of wilderness, 3) and to encourage the participation of visitors in the care of wilderness through service projects.

Evaluation Criteria for Assessing Need for Outfitter and Guide Assistance

Once a general need for outfitter and guide services in the wilderness is established, it is necessary to establish a method and guidelines for evaluating and rating existing and potential operations. This evaluation process gives the deciding officer a tool to help determine if the service is needed and provides a clear set of guidelines for proponents of existing or new outfitter and guide services. Appendix D describes the Evaluation Criteria for assessing the need for outfitting and guiding assistance for the Eagle Cap Wilderness.

Appendix E provides examples of summary ratings obtained by applying the Evaluation Criteria for the various types of activities currently provided by outfitter and guide operations authorized in the ECW; and for various types of activities not currently being provided. The summary is not

all inclusive. As additional activities are identified or proposed, they will need to be rated based on the specifics of the proposal to determine the need for the service.

a. Commercial Operations

Where the majority of the Evaluation Criteria questions receive a YES answer, a "management need" for outfitting and guiding assistance is determined to exist and the proposed or existing operation should be considered. For the types of activities listed in Appendix E, a "management need" for outfitting and guiding assistance exists for many but not all of the listed activities.

Inquiries have been received from individuals who desire to provide additional outfitting and guiding assistance in the ECW. These individuals have proposed providing the following commercial services: horse pack trips and day rides, llama pack trips, backpacking/hiking trips and day hikes, mountain climbing and mountaineering, teaching minimum impact techniques, service project trips, fly fishing, and photography.

Using the Evaluation Criteria a "management need" for outfitting and guiding assistance can be determined to exist for some of the proposed services. However, the only proposed services not currently being provided by outfitting and guiding operations in the wilderness are goat pack trips, burro pack trips, fly fishing, mountain climbing and mountaineering, service project trips, teaching minimum impact techniques, education trips specific to resources found only in wilderness, and photography.

In most cases, the "management need" for commercial outfitting and guiding assistance for the remaining proposed services is being adequately served by current outfitting and guiding operations. This is particularly so for horse pack trips, horse day rides, llama pack trips, and youth backpacking trips. However, a "management need" does exist for service project trips where the focus of the trip is on participants accomplishing a trail or other project that benefits the wilderness, and for trips that are designed specifically to teach Leave No Trace or minimum impact camping techniques for backpackers or stock users, especially if these services are focused on populations who would not otherwise have the opportunity to visit wilderness. A "management need" does not appear to exist for outfitting and guiding assistance with day hikes or day rides, trailhead shuttles, fly fishing, and mountain climbing and mountaineering, and private land resort programs.

b. Institutional Operations (Clubs, Organizations, Churches, Schools)

Where the majority of the Evaluation Criteria questions receive a YES answer, a "management need" for outfitting and guiding assistance is determined to exist and the proposed or existing operation should be considered. For the types of activities listed in Appendix G, a "management need" for institutional outfitting and guiding assistance exists for some, but not all, of the activities listed.

Additional applications for institutional outfitter and guide operations have been received from schools and other groups for backpacking trips and youth service project and adventure trips. Because these operations do not offer outfitting and guiding type services to the general public,

but rather to a membership or limited constituency, the "management need" determination may be slightly different than for a commercial operation. For instance, an institutional outfitter could structure an operation to meet some criteria more easily than a commercial operation because they are made up of members of a special population or are partially supported by funds derived from taxes. It is necessary to consider this use in the recreation use analysis and use allocation process.

Currently permits exist for educational institution outdoor recreation programs, and youth backpacking and hiking tours. The "management need" for outfitting and guiding assistance for these services is mostly being served for these particular membership groups by current outfitting and guiding operations but there may be reasons to adjust the amount, timing, and location of the use or to modify the populations served to better meet the needs criteria. Based on current evidence, a "management need" does exist for service project trips where the focus of the trip is on participants accomplishing a trail or other project that benefits the wilderness, and for trips that are designed specifically to teach Leave No Trace or minimum impact camping techniques for backpackers or stock users. A "management need" does not appear to exist for institutional outfitting and guiding assistance with trips designed primarily for general recreation purposes.

E. STANDARDS AND GUIDELINES

Use of Criteria for Continuing, Expanding, or Reducing Outfitter and Guide Operations

The evaluation criteria displayed in Appendix D will be used, as described above in Section D, as the method of evaluating whether outfitter and guide operations are meeting or will meet the "management need" and help accomplish wilderness management objectives. It can also be used by current and prospective outfitters as a set of known guidelines that must be met in order to be successful and continue or expand operations in the ECW.

The Deciding Officer should use these criteria as guidelines in making the decision on outfitting and guiding proposals, realizing that each outfitter and guide proposal is unique and could rank very differently depending on the location and timing of the proposed use and the focus of the operation. The special use permit administration process can be used to integrate these needs criteria into permits and operating plans.

LAC Standards for Outfitter and Guide Operations

The ECW Stewardship Plan contains LAC standards for all social, biological, and physical wilderness resources, and managerial components. The needs evaluation criteria developed in this assessment are an addition to those LAC Standards and will be used and implemented similarly. Outfitter and guide operations which do not meet the evaluation criteria will be reduced, eliminated, or not allowed to begin operating.

Allocation of Capacity by Use Type and Area

The evaluation criteria must also be applied to current and prospective outfitter and guide operations as part of the recreation use and capacity allocation process. In 1998 a Recreation Use and Allocation Analysis will be completed using wilderness visitor data collected during the 1995-1997 seasons. Once this analysis is completed, specific areas and times of high and low use can be determined and possible management actions to maintain or improve conditions to meet LAC standards can be identified. One of the management actions will be to allocate a percentage of total use capacity to commercial and institutional outfitters. This allocation could be more, less, or the same as current outfitter and guide use levels, depending on the results of the recreation use analysis and application of the needs evaluation criteria to current and potential operations.

One method of allocating use capacity to outfitters and guides could be a "pool system". Under this system, an overall capacity for all outfitter and guide operations is identified. Priority use days and temporary use days are allocated from this capacity, to outfitter and guide operations which meet the evaluation criteria. Excess use days, from within the pool of days allocated to all outfitters and guides, are made available for existing and prospective outfitter and guide operations which meet the needs described in the evaluation criteria. Emphasis for reallocation of pool use days will be given to those operations which help meet the needs that are not currently being met.

The moratorium which freezes outfitter and guide priority use days at 1994 levels will continue until the 1999 season. No additional priority use days will be permitted and applications for new outfitter and guide permits will not be approved until after the recreation use and capacity allocation process is completed. After an allocation of capacity is made, outfitters and guides can be managed by use type, timing of operations, season, and area of operation. Adjustments to current operations can be made and new proposals considered if appropriate. It is expected that the Recreation Use and Allocation Analysis acid allocation of use to outfitters will be completed in time for the 1999 summer season.

Monitoring and Permit Administration

Basic monitoring of wilderness use and recreation impacts is described in the ECW Stewardship Plan and is the same for outfitted and non-outfitted groups and camps with one exception. In order for decisions based on the monitoring to be valid, care must be taken to accurately identify use and impacts attributable to outfitter and guide operations. The best way to accomplish this is to compare visitor use and impacts between outfitter and guide and non-outfitter and guide groups using repetitive sampling on a variety of sites.

Administration of Outfitter and Guide Special Use Permits is critical to implementation of this Needs Assessment and the future Recreation Use and Allocation Analysis. In particular, detailed operating plans, itineraries, and use reporting should be assured through site visits and meetings with permittees. Inadequate emphasis and funding of permit administration will allow potential problems to go unchecked and encourage unpermitted outfitters and guides.

F. REVIEW OF NEED FOR OUTFITTER AND GUIDE ASSISTANCE

To be most useful, this document must remain dynamic and be reviewed on a regular basis to take into account changes in Congressional and agency land management direction, resource conditions, and user conflicts.

This document will be reviewed annually, or more often if law or policy changes, or if significant concerns are raised from monitoring LAC standards, to determine if any updates or additional recommendations are necessary.

G. OTHER GUIDELINES

1. The process described in Section E., and as adjusted in future reviews, is the process for modifying and authorizing all outfitter and guide operations in the ECW.
2. For existing types of outfitter and guide operations, utilize unsolicited applications and informal proposals to determine when to schedule the process described in Item E above in an Annual Program of Work.
3. For currently non-existing, but needed types of outfitter and guide operations, establish a due date for receiving applications to assist in scheduling the process described in Item E above in an Annual Program of Work. Utilize proponent's willingness to fund process to assist in prioritizing requests.
4. Geographic areas, types of activities, mode of transportation and season of use authorized will be specifically identified in the Special Use Permit or attached Operating Plan.
5. Additional priority use for day trips or less will not be authorized. Adjustments will be made at the earliest opportunity to those permits which authorize such use to remove unneeded use days.
6. Groups or institutions who desire a new outfitter and guide permit for a service already offered by an existing outfitter or guide permittee will be encouraged to utilize the services provided by an existing outfitter or guide wherever possible.
7. Take maximum advantage of the opportunity to permit incidental use using Form FS 2700-25 to simplify the process.
9. Utilize Volunteer Agreements, whenever possible, for activities and service project trips undertaken by non-commercial and non-institutional entities which do not meet the definition of operations needing a Special Use Permit.
10. Authorize only those types of activities, whether by outfitter and guide permit or agreement, that have a high wilderness dependency.
11. Prepare a letter, or handout to inform interested parties of process for acquiring an Outfitter Guide Special Use Permit. Include the needs, evaluation criteria in this letter or handout information.

APPENDIX D

EVALUATION CRITERIA FOR DETERMINING THE NEED FOR OUTFITTER/GUIDING SERVICES

These are the criteria that will be used to evaluate a new outfitter/guide application, or to modify a current outfitter/guide operation. The Line Officer will use these guidelines as evaluation criteria for existing and proposed new operations. Not all criteria would have to be fully met for an operation to continue or be considered. The standard is that 2/3 of all criteria for a particular activity must be rated at least moderate or high.

1. Skills and Equipment - Outfitting/guiding skills and equipment are needed by a portion of the public because of one or more of the following:
 - a. Specific skills required for activities appropriate for the area require substantial time and/or talent to learn.
 - b. Learning necessary skills and participating in the activity requires acquisition and consistent use of expensive, specialized equipment for which the public could not, or normally would not, expend the dollars or time.
 - c. The skills required are so unique that outfitting/guiding assistance is almost a prerequisite if the public is to have any opportunity to participate in and enjoy the activity.
2. Knowledge - Outfitting/guiding knowledge of the resources within the activity area and the activity itself is needed by the public, especially those who are not familiar with the area, in order to enjoy recreational opportunities in a manner that reduces resource damage and user conflicts. This includes knowing where and by what method to best access, travel through, and camp in an area.
3. Safety - Outfitting/guiding special skills and equipment are needed to assure a reasonable level of safety, in a wilderness setting, for the participants. Without outfitter assistance, members of the public could seriously endanger their health or lives or would not visit the wilderness due to safety concerns. This could apply to people who use outfitter and guide services for their first wilderness trip and then visit on their own, or it could apply to an activity such as technical climbing where extreme hazards exist for those who are inexperienced and ill-equipped. This criteria is not meant to diminish the wilderness values of self-reliance or the opportunity to challenge oneself or experience a degree of risk.
4. Education - Outfitting/Guiding assistance is needed to:

- a. Provide historical, prehistoric, or interpretive information that can only be experienced in this wilderness.
 - b. Provide educational trips focusing on a specific resource or condition found only in this particular wilderness.
 - c. Provide for educational experiences where the primary focus of the trip is to teach or certify visitors in the use of techniques and equipment designed specifically to minimize wilderness impacts.
5. Wilderness Dependency - The extent to which the proposed service can be offered on private lands, non-wilderness national forest lands, or other public lands. Some examples of these services could be:
- a. Outfitted supported camps more than a days' easy hike from a road.
 - b. Trips in which solitude and unconfined, primitive recreation are the central components of the experience.
 - c. Visits to ecosystems, geological, or physical resources found only in wilderness for recreational, scientific, or educational purposes.
6. Utilization of Existing Permits - The extent to which already authorized use days and capacity exists for existing permittees to fulfill the need. Proposals for new outfitter and guide operations similar to existing operations should not be considered if existing outfitters and guides have unused days in their permits.
7. Level of Use and Conflict - The compatibility of commercial, institutional, and general public use, and the amount of use and social capacity within a given area of the wilderness. The recreation use indicators are measured against the LAC standards. Additional, outfitter and guide use days are not granted where LAC standards are exceeded or where a trend suggests that standards will be exceeded. Outfitter and guide use levels may be reduced from current levels, along with all visitor use, in areas where LAC standards are exceeded.

An example of this situation is the crowded conditions which occur on popular day use trails (such as Wallowa River, Hurricane and Lostine River) and in some overnight destination areas (such as the lakes basin management area) on summer weekends. Operations which propose to utilize these areas are not consistent with the need for outfitter and guide services in the wilderness.

8. Resource Concerns - The amount of interference an outfitter/guide operation will have with the natural biological and physical processes of the wilderness. The biological and physical resource indicators are measured against the LAC standards. Additional outfitter and guide use days are not granted where LAC standards are exceeded or where a trend suggests that standards will be exceeded. Outfitter and guide use levels

may be reduced from current levels, along with all visitor use, in areas where LAC standards are exceeded.

An example of this condition is the over utilization of firewood and lack of adequate forage for livestock in many of the popular high altitude lakes basin destination areas. Operations which propose to have campfires or graze livestock in these areas may not meet the need for outfitter and guide services in the wilderness.

9. Populations Served - The extent that services are offered and provided to people in need of assistance to visit the wilderness such as:
 - a. Senior citizens
 - b. People with disabilities
 - c. Non-typical wilderness visitors.

A non-typical wilderness visitor is one who does not fit into the profile (described by research studies done in the ECW in 1965 and 1993) of the majority of people who visit the ECW. The profile of the typical wilderness visitor is one who is white, male, fairly well educated (at least some college), between the ages of 25 and 54, and has an income greater than \$35,000 per year.

10. Service Projects - The type and number of projects that could potentially be accomplished by visitors who are supported by outfitters such as:
 - a. Trail maintenance
 - b. Campsite or trail restoration
 - c. Trail bridge repair, construction or removal
 - d. Trash pickup, abandoned equipment removal