



February 8, 2017

Mike Williams
Forest Supervisor
Okanogan-Wenatchee National Forest
24 West Chewuch Road
Winthrop, WA 98862
ATTN: Jennifer Zbyszewski

Submitted via the Forest Service ecosystem management database

RE: Draft Supplemental Environmental Impact Statement (SDEIS) for the Pack and Saddle Outfitter-Guide Special Use Permit Issuance Final Environmental Impact Statement (FEIS)

Dear Supervisor Williams:

We are writing as conservation, wilderness and recreation organizations in support of the revised Alternative 4 outlined in the Supplemental Final Environmental Impact Statement. Our organizations value both the designated Wilderness areas and the opportunity of current and future generations to enjoy recreational opportunities both in these protected areas as well as elsewhere in the front and backcountry of our national forests.

We appreciate the four years of analysis, input and effort that the Okanogan-Wenatchee National Forest has put toward the Pack and Saddle Stock Outfitter-Guide Special Use Permit Issuance project. We recognize that pack and saddle use is a compatible use within designated Wilderness areas and elsewhere on the Forest. We appreciate the attempt to accommodate and balance pack and saddle use both in and outside of Wilderness areas.

Wilderness is the strongest and most lasting protection for our public lands. In Washington State our 32 Wilderness areas, totaling more than 4 million acres, are a key contributor to the high quality of life we all enjoy. In fact, access to places like the Pasayten Wilderness on the Okanogan-Wenatchee National Forest and other public lands statewide is a major reason why many of us choose to live, work and play here in Washington State. The Pasayten and Lake Chelan Sawtooth Wilderness areas include the headwaters of three major watersheds on both sides of the North Cascades. The area provides important habitats for many species such as salmon, bull trout and steelhead in the Chelan, Pasayten and Methow rivers. Wilderness provides solitude and renewal for a growing population along with diverse, world-class recreational opportunities.

In addition to designated Wilderness areas, unroaded wild areas outside Wilderness also provide important recreational opportunities and economic benefits to local communities. Often these areas are more accessible than designated Wilderness areas. A valuable road network provides important access to world class recreational opportunities throughout the forest. According to the U.S. Forest Service, the Forest receives 2.1 million visits through day and overnight visits. Paddle and stock is an historic and important activity on the forest in addition to hunting, fishing, camping, hiking, mountain biking, paddling, horsepacking, climbing, skiing, wildlife watching and photography.

We feel strongly that providing recreational opportunities as appropriate both inside and outside designated Wilderness is an important function of the Okanogan-Wenatchee National Forest. Facilitated access through outfitting and guiding is a critical part of that recreational mix. The past two decades have seen a winnowing of opportunities and management of outfitting and guiding on the Forest due to the absence of a permit renewal and issuance policy. Nationally, as seen in a letter of intent from Chief Tidwell last May, as well as documents explaining interpretation of agency permitting policy, the Forest Service has taken significant steps to streamline the permitting process to remove historic barriers for groups interested in accessing our national forests, and our organizations support these processes at the district level as well as nationally.

Our organizations also believe that facilitated access through guided recreation can bolster agency capacity to not only manage trail conditions (these groups—especially pack and saddle—often log out or clear trails), but also provide an opportunity for trail user education such as Leave No Trace principles.

In an era of shrinking agency appropriations and reduced capacity to manage our federal lands, we believe that guided recreation can be a solution rather than a problem. Further, indirect enforcement of applicable regulations, policy and best practices can be included in the permit structure and implemented by experienced outfitters. In many ways, monitoring the impact to the resource of commercial or guided trips in the Wilderness is much easier and more accountable than general public recreation. Finally, commercial outfitters provide an essential service in getting people outside, particularly youth, who may not have the equipment, experience or knowledge to do so on their own.

Specific Comments on the SDEIS and FEIS

The Revised Alternative 4 is an improvement from the FEIS

We appreciate efforts put into revising Alternatives 2 and 4 as part of the SDEIS. The additional 2016 Needs Assessment related to visitor capacity for pack and saddle outfitting both inside and outside designated Wilderness areas was pertinent and useful. The result provides better alternatives that balance this recreational opportunity appropriately between Wilderness and non-Wilderness locations.

Based on that analysis, Alternative 4 has been adjusted in the following manner to better manage capacity and protect associated Wilderness and ecological values (SDEIS Pg. 13):

- The total number of priority-use service days assigned to all permit holders within wilderness would not exceed 1,330 days in the Pasayten Wilderness or 660 in the Lake Chelan-Sawtooth Wilderness to be consistent with the 2016 Needs Assessment.
- The total number of pack and saddle visitor days on the national forest has been reduced from 31,136 to 30,502.
- The total number of pack and saddle service days by outfitters as part of this permitting project was reduced from 6,700 to 6,082.
- Any unallocated service days identified in as part of the 2016 Needs Assessment that were beyond the highest 5 years plus 25% would be held in a pool for outfitters to access on a year-to-year basis if and when demand exceeds individually allocated service days.
- With respect to the Pasayten Wilderness the number of pack and saddle service days is actually less than Alternative 2

Efforts have been made in Alternative 4 to address potential issues related to barren core and campsites within 200 feet from lakes and streams

Alternative 4 would ensure that no degradation beyond the current amount of barren core associated with camp sites in Wilderness areas by permitted outfitters and guides. While we understand that it is beyond the scope of this project, a similar management of barren core should be applied as part of the ongoing forest plan revision to apply to public pack and saddle and traditional camping that makes up the majority of such recreational activities.

We understand that Alternative 4 proposes a forest plan amendment to allow pack and saddle permitted outfitters to use camps within 200 feet of meadows, lakes and streams. This accommodation is in both Alternative 2 and Alternative 4. The size of these camps are mandated to not increase in size. We suggest that as part of permits issued, outfitters be asked to assist with monitoring and data collection (e.g., measurements, camp management plans, water monitoring) at these camps to ensure that the intent of non-degradation is upheld. Furthermore, we suggest that as part of the issuance of permits, if a violation occurs, that the agency implement an appropriate response using the tools at its disposal including notice of compliance, permit action or permit termination.

Thank you for the opportunity to comment.

Sincerely,

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