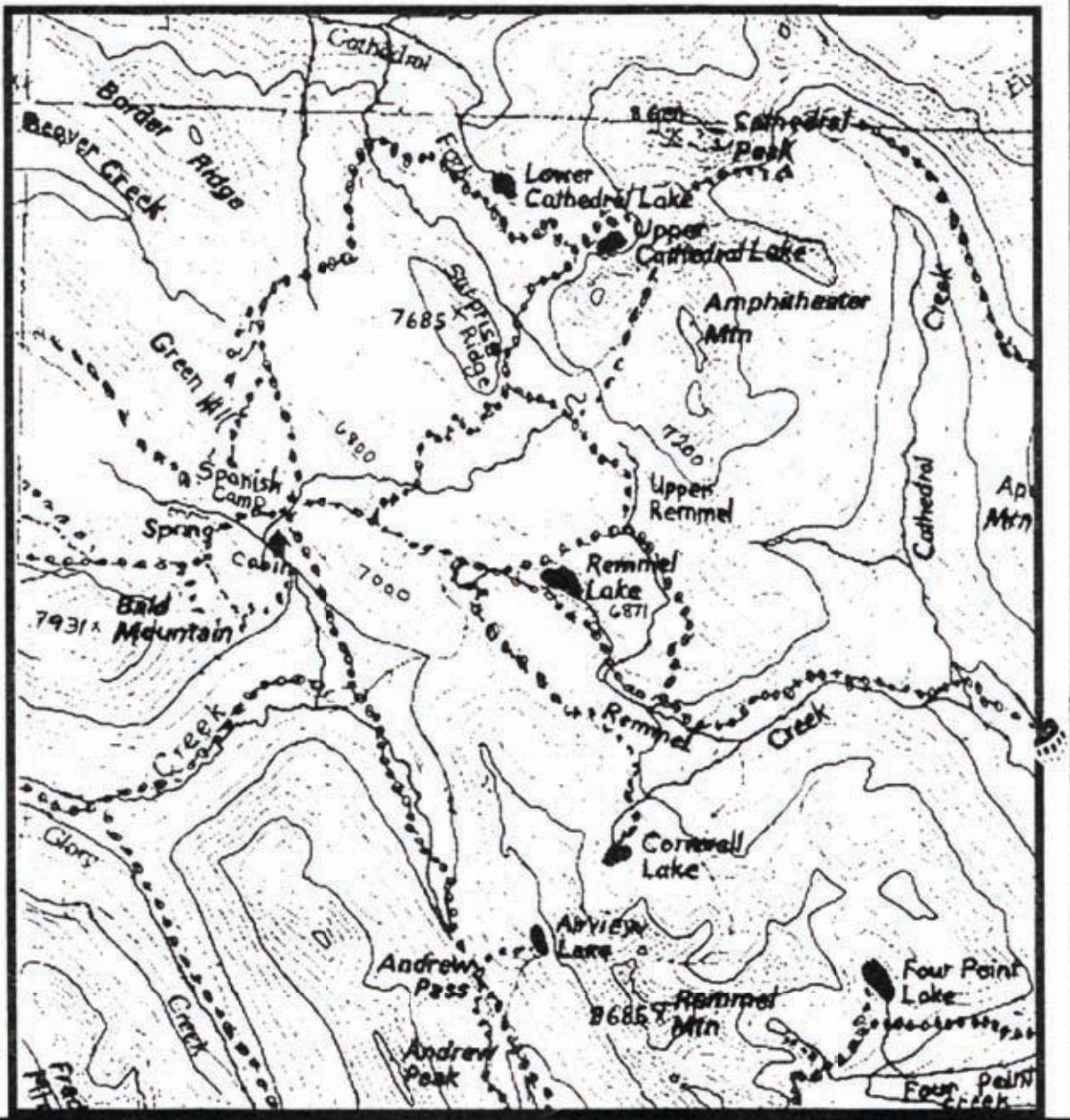
THE 1999 REPORT ON THE STATE OF THE PASAYTEN WILDERNESS

A Description of its Use and Degraded Condition as well as Legal Implications and Solutions



The Section of the Pasayten Wilderness Studied in 1999

This year's study was from Andrews Creek and Chewuch River Trailheads northwest to the Bald Mountain and Cathedral Peak areas. Most of our time was spent in major destination areas, Remmel Lake, Upper Remmel, Spanish Camp, Beaver Creek, Lower and Upper Cathedral Lake, the Tungsten/Chewuch junction, Andrews Pass & Bald Mt.

Part I: Introduction

IF there is a place in the Pacific Northwest where we might again hear the howls of wild wolves echoing through the valley, see grizzlies rummaging in the vegetation, or catch a glimpse of a wolverine disappearing into the rocks .....

If there is such a place, isn't it the Pasayten!

That was what I heard, and wanted to believe.

I thought the Pasayten was a wild place until I spent more time there. Now I know that its valley bottoms and ridge tops are not remote, lonely places where people and wild animals can find solitude.

Instead, a maze of well-used trails take people to all parts of the Pasayten. Trails follow almost every stream valley and lead to almost every wetland. Campsites dot the land. Next to these camps are over-grazed wetlands.

But the Pasayten is a designated wilderness! A place where plant and animal communities live free of human domination!

No, visitors and their livestock are allowed to degrade the Pasayten's most treasured natural ecosystems. Groups of up to 30 "heartbeats" are permitted; 18 horses and mules and 12 humans. There is no restriction on the number of these groups.

In some parts of the Pasayten, well over half the visitors are horses and mules. At best, these animals aren't low-impact campers.

Parts of the Pasayten are heavily used by commercial outfitters. Not only do they offer guided horse trips. Outfitters also maintain a commercial transportation system in the Pasayten. For a fee they will pack people and gear into any part of the wilderness.

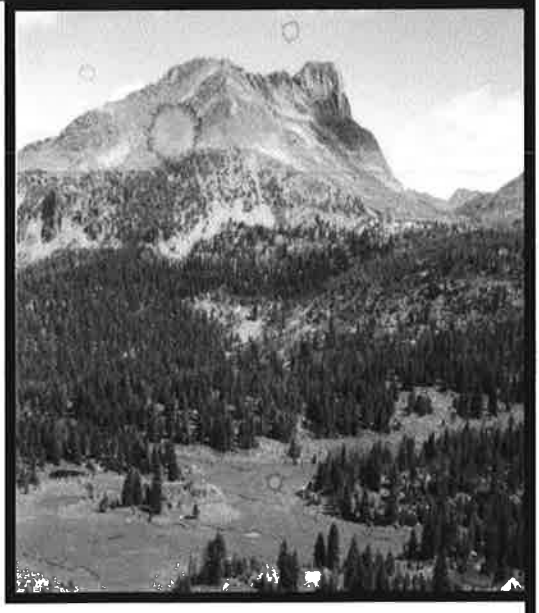
There are no restrictions on campfires; not even at higher elevations where recruitment of snags and logs takes centuries. Live and dead trees go into fires.

Horse groups are permitted, even encouraged, to let their livestock run loose to graze. Since the best and most forage is found in wetlands, most of the grazing occurs in these ecosystems. The Okanogan National Forest (ONF) insists this practice is the least damaging way to feed recreational livestock.

All of these human activities are centered in riparian areas; trails, campsites, and grazing. This is particularly disturbing due to the importance of wetlands and streams.

Riparian areas are biologically the most productive ecosystems. These are the habitats wildlife use the most. Streams are also the main travel corridors for wildlife.

Healthy wetlands and streams are necessary for healthy watersheds. Wetlands influence the rate and timing of stream flows. In spring when snowmelt and rains can over-load streams, wetlands absorb and hold the water.



This decreases peak flow and flooding and the damage they cause. During the summer and fall when water is in short supply, wetlands slowly release this stored water into the system.

High elevation wetlands and streams also provide high quality, cold water and nutrients for the lower watershed.

Only about one to three percent of the land consists of wetlands and streams, yet ONF has not protected these ecosystems.

I now realize that just because the Pasayten is a designated wilderness, it's not necessarily untrammeled by people or a refugia for wildlife. We, the people who need to know there are still wild places, must remain involved in the management of the Pasayten. The Forest Service needs our help.

So work begins on a series of yearly reports on the Pasayten. Each year a different area will be studied. This year, 1999, the study area was north of the Chewuch River.

Our goal is a wild Pasayten where natural ecosystems can exist without human interference. We must insist that the ONF protect the Pasayten, its wildlife and plants, riparian areas, and other resources as required by law.

"Wilderness shall be managed to prevent degradation, to preserve its unique values, and where necessary, to restore them. This non-degradation and restoration direction applies to all values of wilderness: social, physical, and biological."
(Forest Service Manual, 322.03)

Part II: Recreational Use

Kind of Recreational Use

Recreation in our study area can best be described as social and extremely "horsy". Well over half of the people we met were with horse groups, private or commercial. Horses and mules far out-numbered people as the largest user group. These animals were highly visible; grazing in wetlands, out on day rides, carrying loads as part of pack strings, and tied in camps clanging their bells as they fought flies. I found all of this interesting at first, since I've had horses most of my life.

Half the people we met were with commercial outfitters who use horses and mules. We met one commercial backpack group with 12 people.

Horse groups were usually large. People in the private groups often rode one horse and had a second to carry their gear. This resulted in three "heartbeats" for each person, one human and two horse. Private horse groups often had 12 to 15 heartbeats.

Commercial outfitter groups usually had the maximum group size allowed, 30; 18 horses/mules and 12 people. On the trail they usually traveled in two groups; clients and guides in one group and a wrangler leading the string of pack animals in the other.

The private backpack groups were small, averaging between three and four people. This is about the same group size as we've experienced in most wildernesses.

Because most visitors were part of large horse groups, our study area lacked the solitude and wildness we expected. Instead it was more like a ranch with it's large sprawling camps, frequent encounters with horses, hitching posts, and big campfire circles.

In this part of the Pasayten private and commercial horse groups seemed to plan their trips around a base camp. These were set up in one of the destination areas; Remmel Lake, Upper Remmel, Spanish Camp, Bald Mountain, Beaver Creek, or Cathedral Lakes. They rode the 15 miles from the trailhead to the base camp in one day. Private groups typically stayed about a week. From these base camps people took day rides, leaving pack animals tied in camp.

Horseback riding was both on and off trails. Many off-trail meadows and wetlands were trampled. For instance, the high shoulder of Bald Mountain showed heavy horse use off trail though it has many trails. In fact, we seldom found a place without signs of horses.

From a 1994 Wilderness Ranger Report

"There were several drop camps of horse outfitters which obviously were unaware of wilderness regulations and minimum impact ethics. Cutting green trees, escaped campfires, and poor campsite selection were the most common problems."

People also came to the Pasayten as part of "drop camps". This means the people paid an outfitter to pack in their gear while they either rode or hiked in. Some of these groups were large. Many drop camp clients lacked basic wilderness skills. Some hiked with guns in holsters but no maps, left ample amounts of TP around camps, and had no idea where they were. One group of boy scouts had well over 12 people spread out between two camps. When we last saw them they were looking for a lost horse.

We met most of the backpackers near the trailheads. They usually were going to destinations outside our main study area; Peepsight, Coleman Ridge, Four Point Lake, etc. They were only using the two main trails to reach side trails to these sites. Four backpack groups were camped near the trailheads. We met only two backpack groups staying in our main study area, one group of four camped at Upper Cathedral and the other a group of two at Remmel Lake.

Many visitors failed to practice low-impact camping skills. While the USFS explains these on trailhead signs and in numerous brochures, both commercial outfitters and private groups ignored many of these suggestions.

My Journal **Wednesday evening, August 25, 1999**

"As I neared the Upper Remmel Area, loud braying of mules caught my attention, and then the clanging of the bells that hang around their necks. I soon realized that the mules were being answered by other mules camped far below at Remmel Lake. At the first large horse camp on the trail, I heard someone chopping wood and smelled a burning campfire. A group of people were talking. Someone was softly strumming a guitar. Several horses nickered. A palomino was tied to a tree near camp; more animals were tied in the woods behind. They had not yet been let loose to graze the nearby wetland that serves as pasture for this camp. I turned towards Remmel Lake and the sound of the other braying mules. I wove between four horses grazing along the trail and passed a group of campers next to a fire. When I encountered two spooky mules blocking the trail , I asked the owner for help. He and I talked mules for awhile before I continued on down the trail. (I have a special fondness for mules)

As I headed for our campsite I had the feeling that somehow I'd ended up in a giant dude ranch."

Violations of enforceable regulations (CFRs) were also common; cutting live trees and branches for firewood and tent posts, damaging live trees by tying stock to them, grazing within 200 feet of lakes, etc. Wilderness rangers didn't seem to notice. Their policy is to use education, not enforcement. This obviously wasn't working.

Horse groups were able to pack in a lot of gear which increased their impact. Most had guns. We heard gunfire several times. Once it was very close and we identified it as a group shooting at squirrels.

Saws and hatchets were also standard equipment. Horse groups have a lot of campfires so these were in frequent use. We passed camps with fires burning at all times of the day and evening. Some outfitters still had the old wood burning stoves in their tents in summer. These heat all their tents during fall hunting season.

To keep all of these fires burning, visitors were causing significant and widespread damage to wilderness resources. Live branches and trees as well as snags and logs were routinely cut for firewood. At higher elevations where wood is naturally scarce, every piece is important to the health of plant and animal communities. Burning this wood in fires is unnecessary degradation.

From a 1994 wilderness ranger report:

"The Pasayten is a relatively under-used wilderness area. However the impacts that are tolerated are severe. As use increases with population, and as recreation receives more emphasis, changes in policy need to occur to protect the integrity of the Pasayten as a wilderness."

It is often assumed that the number of people using a wilderness is an indicator of the amount of damage occurring. This definitely is not the case in the Pasayten. People with horses and mules cause far more damage than those backpacking. When the majority of the users are groups with 12 to 18 of these animals resource damage is significant. Add to this the high-impact and even illegal camping practices used by many of these visitors and resource damage is major with relatively low use.

Amount of Use

The ONF believes the Pasayten receives less use than many other wildernesses. While this probably is true, without a reliable permit system there is no way to really know. Fewer than half of all users fill out voluntary registration forms at trailheads. Horse groups have the lowest rate of compliance.

The ONF sometimes looks at "encounter" data collected by its wilderness rangers to assess the amount and kind of use. Rangers write down the number of people they meet (encounter) each day they're in the field.

ENCOUNTERS (* commercial outfitters)

TRAIL	BACKPACKERS humans	HORSE GROUPS humans / stock		LLAMA GROUPS humans / stock	
Chewuch Tr.	18	38	62	4	4
Andrew Tr.	10	24	50		
In and Out	12*	4*	9*		
Trails within the area	7	263 122*	317 157*		
Total	47	325	429	4	4
Total Heartbeats	47	754		8	

Table 1. Number of people & stock met on the two trails into our study area and within our study area.

Encounter data can be misleading and data comparisons difficult since there are so many different ways to collect this information. Time of day, type and location of trails hiked, the kind of meetings that count as encounters, can all effect the data. Are just people counted, or horses too? Is it an encounter when we just see another person, or must we also talk?

We recorded encounters to quantify amount and kind of use. We included all people and horses/mules we met. They were counted if we just saw them as well as when we talked. We noted whether the encounters were with people or stock and the type of group, backpacking, horse, llama, or commercial outfitter. If we saw the same person twice, but in a different place, we counted it as another encounter. This method seemed to best measure the amount and kind of use as well as feeling of solitude and closeness to nature. Table #1, above, has this encounter data.

We also counted the number of groups and heartbeats (human and horse/mule) using campsites around Remmel Lake. These were only counted once regardless of how many times we saw them. This data is on Table #2 at the bottom of this page.

We counted horses and mules because of their impact on the land and other users. One horse can do far more damage than several people. For those wanting a "wilderness" experience, coming upon a wetland full of grazing horses is just as disturbing as seeing one filled with tents. Gone is the wild. This is why we believe livestock must be counted when evaluating both wilderness values and potential resource damage.

We felt like our study area lacked solitude and wildness. There was always the feeling that someone would soon ride by.

Camp-site #	Backpackers groups / heartbeats	Horse Groups groups / heartbeats	Drop Camps groups / heartbeats
8	1 / 2		1 / 19
B	0 / 0	1 / 15	1 / 17**
9	0 / 0	1 / 18	1 / 18
		1 / 20	
10	0 / 0	1 / 30*	0 / 0
		1 / 6	
11	0 / 0	1 / 5	0 / 0
Totals:	**BACKPACKERS**	**HORSE GROUPS**	**DROP CAMPS**
groups	1 group	6 groups	3 groups
heartbeats	2	94	54

* commercial outfitter.
** We did not see all the livestock associated with this drop camp

Table 2. Groups using campsites near Remmel Lake.

Part III: Trails

Our goal was to map all the trails within the main study area and estimate their condition and use level. We completed this for most of the area. The rest will be finished next summer. We discovered there are a lot more trails than we expected!

Kinds of Trails

In our trail mapping, we tried to use the two categories of trails in the ONF Plan, "system trails" and "user created travel routes". "System trails"are defined as trails the ONF maintains and maps. "User created travel routes" are those trails that appear to be wildlife trails and are not readily apparent. The ONF doesn't maintain or map these.

It soon became apparent that the actual trails we were finding didn't fit these two categories. Besides the obvious system trails shown on USFS maps, there were many other well-used trails that certainly didn't resemble wildlife trails; they were well hardened and visible. We ended up mapping these hardened user created trails and system trails, but not wildlife trails.

The presence of so many trails that aren't on USFS maps is a problem. While they cause the same impacts as mapped trails, the ONF isn't including them in its trail data base. That means these are being skipped whenever their trail data is used in studies, reports, and mapping.

This maze of user-created trails also effects encounter data. Fewer encounters will be recorded in an area with a higher density of trails than in an area with fewer trails. So data from areas with different trail densities cannot be compared.

The abundance of user-created trails is probably due to the extensive use of horses. Only a few horse trips change a hard-to-find wildlife trail into an obvious trail. This attracts more use. Soon it is another well-used, but unmapped trail.

Location of Trails

As expected, most trails follow stream valleys. What was surprising though was that trails run along almost every stream and lead to almost every large wetland. I soon concluded that if I found a larger wetland, no matter how secluded, I'd soon find a trail. This concentration of trails in riparian areas affects the health of the streams and wetlands, as well as the watershed.

Trails also reduce the value of these areas as wildlife habitat. How disturbing the trails are depends on the amount of use they receive. For instance studies have shown that grizzly bears avoid trailed areas when the trails are used by humans 15 or more times a week. Most trails we mapped receive at least this much use.

Number of Trails

Our study area has a vast network of good trails. These lead to almost every attraction; lakes, ridges, viewpoints. Sometimes two or three trails go to the same area. A separate maze of local trails surround some campsites. This is especially true of permanent camps set up by commercial outfitters.

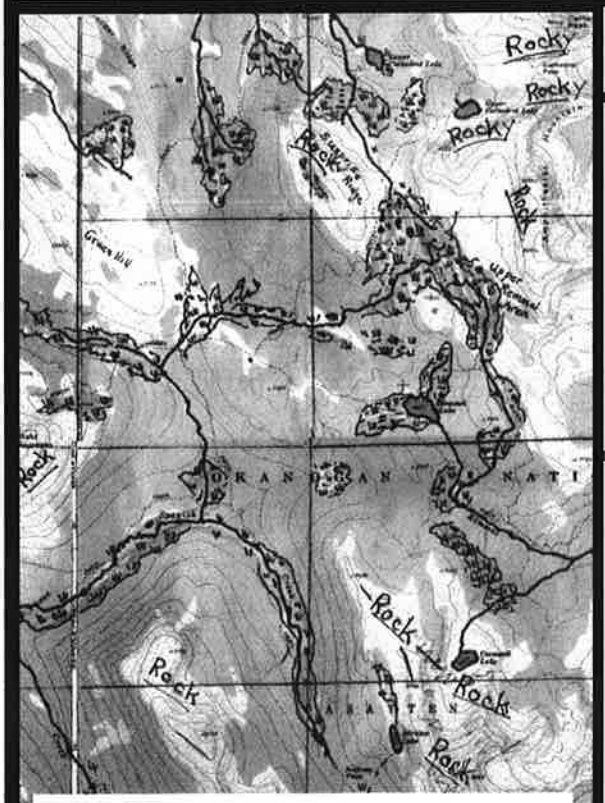
Maps of the Study Area

← Map#1 Streams and wetlands. Areas marked "Rock" are mountains

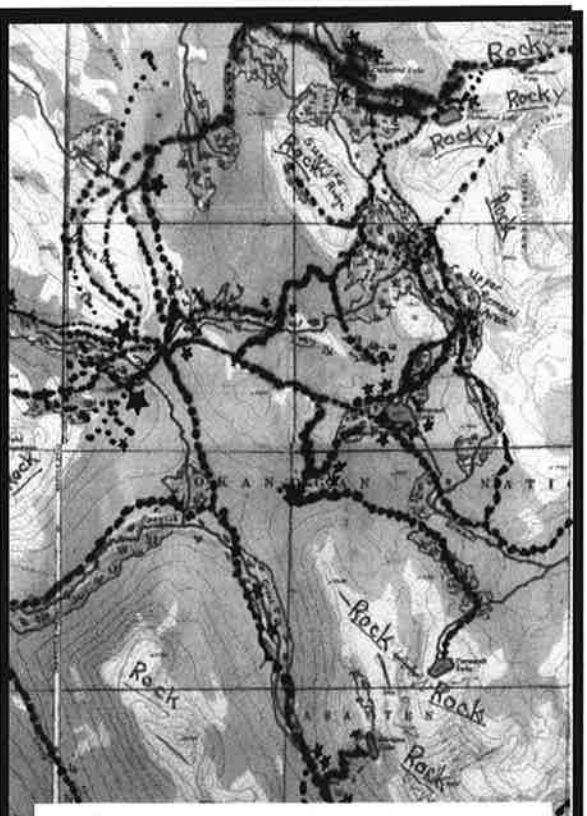
streams
wetlands

Map #2→ Same map with trails added. Dotted lines signify trails

trails .....



#1 Map of the streams and wetlands



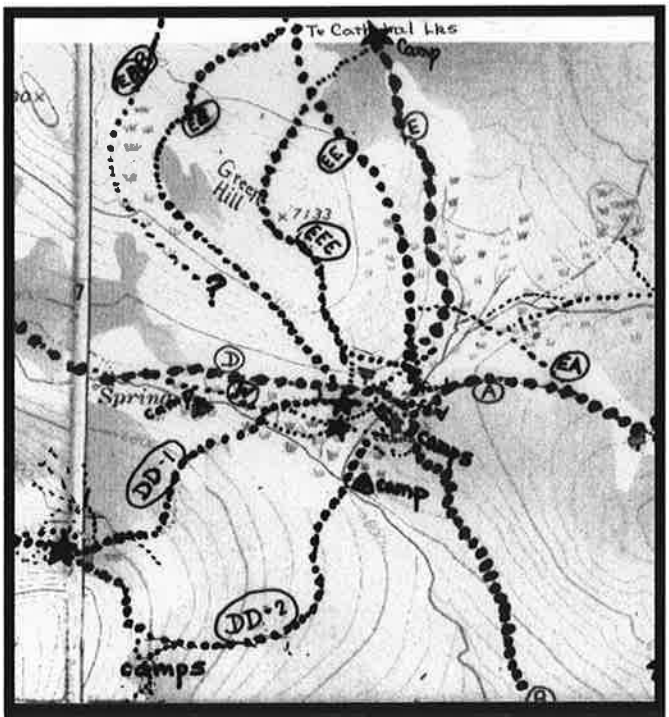
#2 Same map with trails added

Trails run alongside almost every stream, even small unnamed ones like this year-round stream by Spanish Camp

According to an ONF wilderness standard, user-created trails shouldn't not average more than of 0.8 miles per section. Far more exist in our study area.

Condition of the Trails

Many sections of trails are in poor condition, especially where they cross wetlands. Extensive damage is occurring to both the trails and wetlands at these crossings. Sometimes the trail has become a trench of deep mud, or multiple trenches as horses try to avoid the mud. In other places a wide muddy area fills the entire area with no dry edge for a hiker to use. Some trails cross long stretches of wetlands causing damage, as in the photo on this page. Wetland damage is extensive near Remmel.



The network of trails near Bald Mountain and Spanish Camp. Both system and user-created trails are shown.

A trail near Remmel Lake. It's route is almost entirely across wetlands. Another nearby trail could be used instead.

There are many things the ONF could do to decrease damage to wetlands and trails. In many instances the trail could be re-routed around the wetlands. Where another trail leads to the same place, one trail could be closed. Areas with extensive wetlands and soft meadows could be closed to stock until the ground dries out or permanently. More of the trail budget could be spent on re-routing and closing trails; less on opening trails each summer.

There would be much less damage if group size was changed from 30 to 12 heartbeats total per group. Those who cause the most damage should pay higher fees. Commercial outfitters take large strings of horses and mules in and out of the Pasayten all summer and fall. Their permit fees don't cover the cost of repairing damage from their intense use.

The ONF must address these problems instead of just saying it doesn't have enough money. Many of the solutions are not expensive, but do require a change of attitude. Trail dollars should be spent on preventing resource damage first, not on opening trails. Perhaps ONF simply has too many trails to maintain. Temporary and permanent closures would save money. It would have the added benefit of creating more trailless areas increasing wilderness values.

Description of the Chewach River Trail

"Heavily stomped and trampled by horses and hikers. the trail starts wide and dusty and pretty much stays that way, except when it's wide and muddy."

(From *100 Hikes in Washington's North Cascades*, by Ira Spring and Harvey Manning)

Part IV: Campsites

For the campsite survey we had planned to map and document the condition of all campsites in our study area. Horse camps were easy to find by their well-established trails. I believe we found all of them. Camps were identified as "horse camps" when they had worn tie areas, manure, and nearby wetlands with grazing impacts. Two kinds were evident. There were camps used throughout the season and hunting camps just used in fall. The first damaged a much larger area.

We couldn't find camps just used by backpackers. Most backpackers probably don't use the horse camps due to the smell and flies. The backpacker camps were either well hidden or didn't cause enough damage to be found.

We planned to document campsite conditions using the Standards in the ONF Plan. This involves measuring the square feet of bare ground and counting trees with exposed roots. We soon realized that all summer horse camps failed to meet the standards. Area of bare ground was often well over 5000 square feet. Typical was one camp with 6100 sq. ft. of bare ground in the part used by people and another 9200 in the tie area. Camps had dozens of damaged trees. Live trees and live tree branches were cut for fires. Nearby wetlands were degraded by intensive grazing throughout the growing season.

We decided to document enough camps to show the general pattern and then make a composite drawing of the typical horse camp. We obviously were limited to unoccupied campsites. By the end of summer we had surveys of 4 campsites at Remmel Lake, 1 at Upper Remmel , 3 near Spanish Camp Cabin, 4 at Upper Cathedral, 2 at Lower Cathedral, and 3 on Bald Mountain. Three were permanent commercial outfitter camps. Five campsites were surveyed just after being vacated by commercial outfitters. In these we found many violations of regulations.

Drawing of the Typical Horse Camp

The Typical Horse Camp

From our camp surveys a composite drawing of the typical horse camp was created. It has five distinct areas, each the result of a routine camp activity. When the sizes of all five areas are combined, the average horse camp severely impacts well over an acre of land.

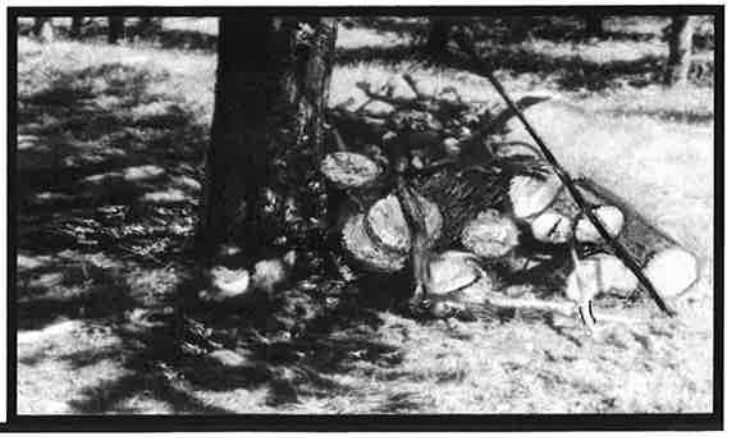
Each campsite had a **People Area**. This was where the tents and campfires were located. It was under trees and next to a wetland. The lower limbs of trees were cut off. The ground was bare and compacted and there were some exposed roots. It was usually clean. The People Area was the smallest of the five areas in horse camps.

Near the People Area, there was one or more **Tie Areas** These were also located in trees. Lower limbs were cut from the trees. The ground was bare and compacted. Damage to trees was much greater there. Tree trunks were cut and girdled from having horses tied to them. Roots were not only exposed; the ground around them was dug out by pawing horses and mules. (Properly installed high lines were hard to find.) Tie Areas were usually larger than the People Areas.

The third area was the **Grazing Area**. The ONF allows and encourages horse groups to feed their livestock by letting them run loose when grazing. This was the method used to feed horses and mules in our study area. Sometimes movement was restricted with hobbles and dangling lead ropes but horses are adept at getting around with these on. A few were staked.

Since the best livestock forage was found in wetlands and wet meadows, this was where the grazing areas were located. The Grazing Area usually covered an acre or more of wetland and stream corridor. The resulting degradation was significant and far reaching. Part V of this report is devoted to recreational livestock grazing because it causes so much damage.

The fourth area is the **Wood Gathering area.** It was often as large as the grazing area. Live trees and tree branches were used for firewood. The two live trees in the top photos were cut for firewood. They are part of the woodpile in the bottom photo. (Campsite #5)



As wood near camps is depleted, campers go farther in search of firewood. So the Wood Gathering Areas are growing in size. Some are already as large as the Grazing Areas.

Newly created trails led us to places where both live trees and tree branches had been cut. One such trail at camp #18 went to a small grove of trees where campers had cut off 63 lower limbs from the eight trees. These had obviously been live edge branches. Nearby groves had also been pruned like this. Lots of stumps were found around horse camps. Of course the cutting of live trees and branches is illegal, but these practices seem to be routine in the Pasayten.

In sub-alpine ecosystems where wood is scarce, burning it up in fires is unacceptable. Wood provides nutrients to the soil, creates special micro-climates and habitats, provides homes, stores water. Snags and logs are also picturesque features to enjoy and photograph. This is why many forests no longer allow fires in sub-alpine and alpine ecosystems.

The fifth part of each horse camp was the system of **Camp Trails.** When 10 to 18 horses live in an area for weeks, well-hardened trails are established. Horse camps often had good trails between the five camp areas and sometimes other trails connecting it to main trails.

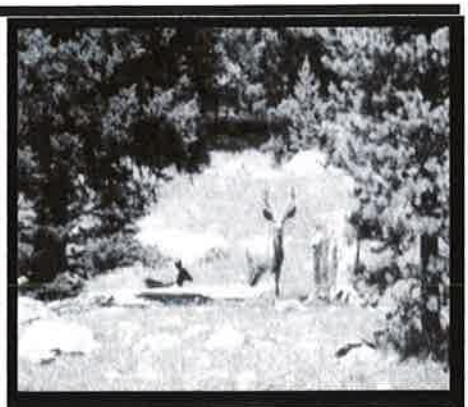
Damaged trees in the tie area for Campsite #13. A girdled trunk. Roots exposed and dug out.

Location of Campsites

Camps, like trails, were centered in riparian areas. All five of the camp areas usually impacted streams and wetlands. Grazing Areas were often right in wetlands and stream corridors. People Areas were on the very edge. Tie Areas were next to or even in wetlands. Camp trails often criss-crossed the stream and wetland areas. None of these should be in the protected riparian zones.

Salt Licks

Many horse camps had salt licks, especially commercial outfitter camps. I was told by outfitters that these were necessary to keep deer from eating their gear. Other horsemen told me just the opposite; that they wouldn't use them because salt attracts deer. There was no doubt that deer were attracted to the salt licks. There was a herd of tame deer hanging around each camp that kept salt licks out. Some of these deer, like the buck and doe in the photograph, were so tame we could hardly get them to move, even with our yelling and barking dog. Camp #1 in the photo belonged to an outfitter who would soon be packing in clients for "high hunt".



Tame buck and doe at camp #1

Food Storage and Garbage

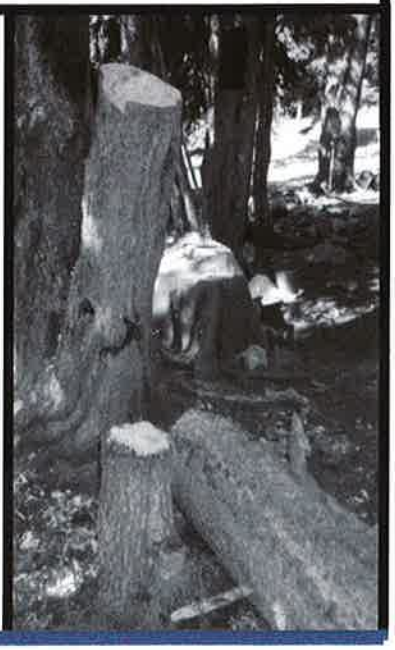
As we all know, the Forest Service asks campers to store food and garbage so bears cannot get into it. The ONF has worked hard to educate both the public and commercial outfitters. Proper food storage and sanitation are important to keep good bears from becoming "problem bears" and easy targets in hunting season. Bear as well as deer hunters are packed into the Pasayten by commercial outfitters.

We discovered that some campers and many outfitters failed to store food or garbage correctly. Left-over food was thrown out on the ground by three different outfitters when they vacated camps. Fresh steak bones and partially buried garbage was left by another. Horse and human food was stored on the ground in containers that weren't bear proof. One outfitter's wooden food box sat out on the ground for days with yellow jackets buzzing around it.

Proper care of food and garbage is important to protect both bears and people. It is crucial to the successful recovery of grizzly bears. The ONF is a partner in The Grizzly Recovery plan yet it hasn't required its commercial outfitters or trail crews to follow regulations on sanitation. The ONF was supposed to be educating both groups on correct sanitation.

Journal, Friday, 8/27

"As we passed campsite #10 we saw two large snags that had just been cut. One measured about 20 inches in diameter, the other about 10. Cuts in a third larger snag showed it was also being cut down. It had stood by this wetland for centuries. This was the friendly mule owner's camp!"



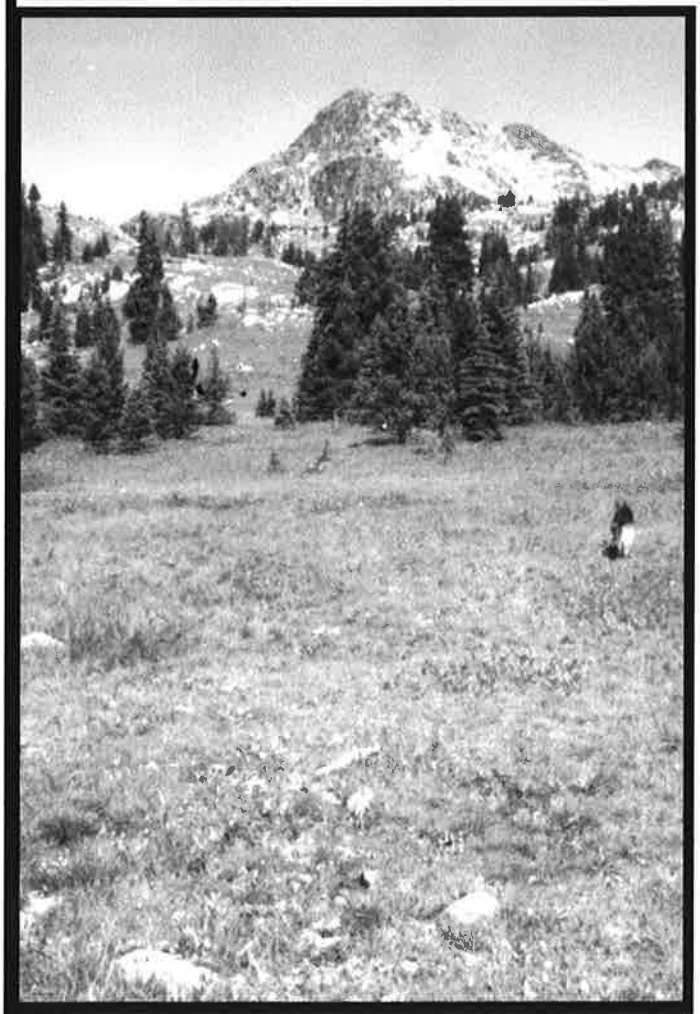
Part V: Recreational Livestock Grazing

Most recreational livestock grazing occured in wetlands and wet meadows. Little or no food was packed in for the horses and mules. We mapped and photographed grazing areas. Impacts to individual plant species and wetland structures were noted. The ONF prohibits recreational livestock grazing within 200 feet of lakes, but not streams or wetlands. PacFish and the Northwest Forest Plan clearly direct the Forest Service to protect all riparian areas, including wetlands, streams, and adjacent land.

Location

Almost all of the recreational livestock grazing was centered in the wetland/stream complexes or wet meadows. These ecosystems produce the most vegetation as well as the plant species preferred by horses and mules. Little grazing occured in the dry meadows dominated by plant species such as yarrow and pussytoes or in the shadier forest openings with lupine and paintbrush. These aren't favorite foods!

Riparian areas are fragile ecosystems that are quickly degraded by large animals. Wet soil compacts easily. Wetland structures such as hummocks and pools are soon flattened and lost. Recovery may take hundreds of years. Some may be irreparable. Restoration, if even possible, is expensive.



The severely degraded wetland at Upper Remmel. Compacted soil. Loss of pools and hummocks. Bare areas in the foreground.

Condition of the Wetlands & Wet Meadows

The grazed wetlands and wet meadows in our study area were in poor condition. From a distance some looked okay; they were green! But upon closer examination the degradation was obvious. Comparisons with nearby ungrazed wetlands highlighted the severity of the damage.

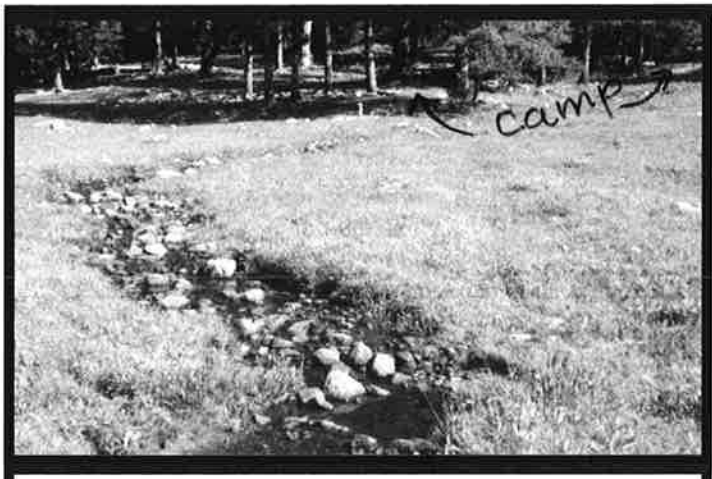
Soils in grazed riparian areas were compacted. When this occurs, soils lose their ability to absorb and hold water. Wetland plants disappear as the soil dries out. If compaction is severe enough, the wetland disappears.

When wetlands no longer hold water, rain and snowmelt runs off increasing peak flows. Later when water is needed most, the wetlands and wet meadows dry out and once year-round streams stop running.

Grazing also flattens unique wetland structures such as hummocks, channels, pools. These provide special habitats required by some plant and animal species. Wetlands in the Pasayten are losing these structures.

Horse groups began using the Pasayten early, arriving before the snow was gone. Commercial outfitters were especially anxious to get their businesses up and running. Damage to trails and meadows is much greater when soils are wet. Recently, we've had many years of late snowpacks that left the ground wet well into summer. This may be normal. Yet each time it happens extensive damage occurs when stock trample saturated soils

A grazed wetland. Remmel Lk. is in the background.



A stream in one grazing area.

Condition of the streams

Streams were also degraded by grazing. Soils on the surrounding slopes were becoming compacted. The usually thick plant cover was sparse and closely cropped. This resulted in greater, more intense run-off, and erosion. As shown in the drawing below, as the streambed deepens, the water table becomes lower. This de-waters the surrounding the wetlands. Eventually wet meadows dry out and are lost. This is occurring in the Pasayten.

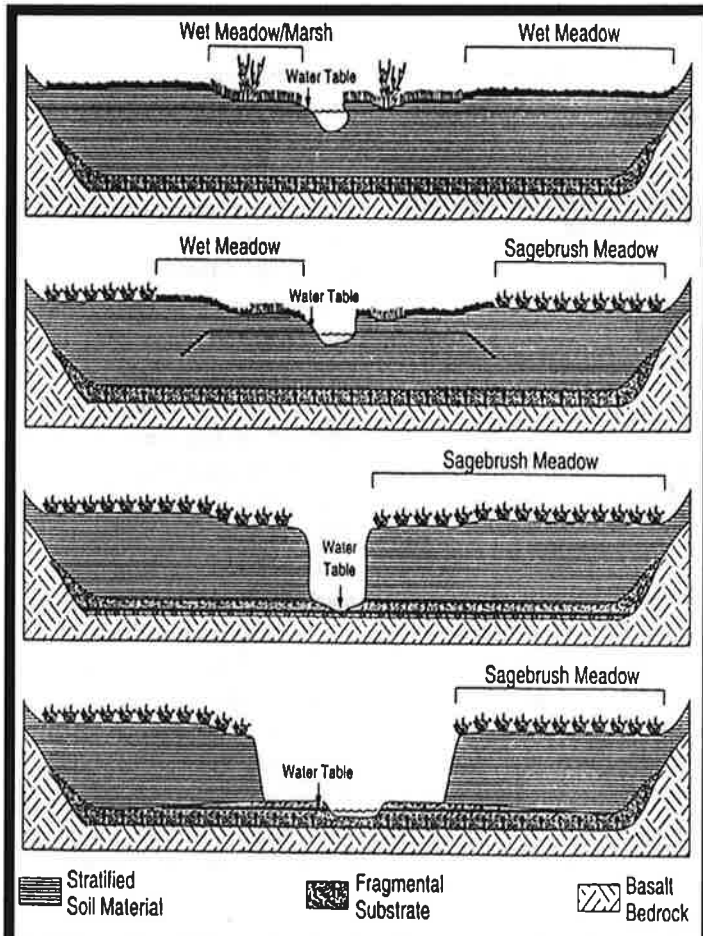


Figure 1. Sequential degrading of a steam channel due to removal of riparian vegetation by livestock grazing. (Taken from USDI, 1994a, Chapt. 3, p. 45)

Grazing also impacts bank vegetation and the important role it plays in maintaining healthy streams. Plants stabilize stream banks. Taller vegetation shades both the water and adjacent land, creating cooler micro-climates in both ecosystems. Plants are the basis of the complex and diverse wildlife communities found in healthy riparian areas. Stream-side vegetation was severely impacted by uncontrolled livestock grazing in our study area.

The photograph to the left shows the condition of many grazed stream/wetland complexes in the Pasayten. The ground is compacted and the plants are cropped short The soil dried out quickly in the summer. A few marsh-marigolds remained. Many of the plants in the photo are little stubs of willow bushes no taller plants provide shade or wildlife habitat.

The 200 Foot Rule for Lakes

While the ONF does not protect wetlands and streams, it does have a CFR (an enforceable regulation) prohibiting grazing of recreational livestock within 200 feet of lakes. Unfortunately this rule is not enforced. Horses regularly graze to the edges of lakes. A quick walk of shorelines shows that grazing is extensive. Since the ONF encourages free grazing of horses and mules, this is bound to happen. Horse owners would need to constantly tend their loose grazing animals to keep them away from lakes, Of course they don't do this.

About the upper Chewuch Basin where our study area was located:

"This portion of the Chewuch Watershed is within the Pasayten Wilderness. These creeks are important as high quality water storage areas for the Chewuch. Preliminary inventories indicate that packstock and livestock use in these areas may be compromising the function of the wet meadows and boggy areas in the Upper Chewuch: this needs more thorough investigation. Because this area is an important source area for stream flows in the Chewuch, maintaining the water storage capacity of this area is an important management consideration for this area."

(from the Chewuch Watershed Analysis)

Impacts of Grazing on Specific Plant Species

Grazing is also changing the composition of plant species in stream corridors and wetlands. Some tenacious species are able to survive, but continual grazing keeps them perpetually short and prevents formation of flowers and seeds. Other species are being eliminated. We found one plant that was actually benefiting from livestock grazing.

I saw willow surviving grazing, but only as short stubs. Gone were many of the large stands of willow that play such an important role in riparian ecosystems. Horses and mules like willow and keep it cropped to within inches of the ground.

Plant species requiring very wet soils and unique structures seemed to be disappearing when grazing was intense. Tufted cotton grass and rushes seem to be eliminated where pools and hummocks were trampled.

Many of the large wildflowers associated with mountain meadows were also disappearing. Horses definitely preferred many of these flowering plants such as western meadow-rue, bracted lousewort, and Sitka valerian, and ate them first. Few remained in wetlands I surveyed, and the tops and flowers of survivors were continually eaten off.

Interestingly, a native potentilla seemed to increase with livestock grazing. We found Potentilla fruticosa replacing willow where grazing was intense. Horses don't like this short, tough shrub, but unfortunately wildlife probably doesn't either. Because of it's small size, it cannot provide other valuable functions performed by willow such has tall habitat and shading.

Plant species vary in their ability to tolerate soils rich in manure and urine. Specific species are most likely decreasing or increasing as grazing changes soil chemistry. Studies show increased salinization impacts individual species composition.

Water Quality

The intensive grazing in riparian areas also impacts water quality. Studies show grazing can increase pathogens. Nutrient concentrations can also rise which reduces dissolved oxygen. This impacts fish, other animals, and plants. Water quality is an issue for people too. We drink from the streams!

The ONF's Management of Grazing

The ONF has made great strides in reducing damage on sheep and cattle grazing allotments. Management plans are designed to keep grazing out of riparian areas. Range managers check conditions. No grazing is allowed in areas showing too much use until plants recover. Allotments are also purchased. Why does the ONF totally ignore recreational stock grazing when it knows grazing must be managed to protect resources?

The ONF, by law, should look at grazing impacts when renewing commercial outfitter permits. The last time permits were renewed the ONF said there was no significant impact to the wetlands. These permits now are being renewed again. Will wetland impacts be disclosed and prevented this time?

Laws require the protection of riparian areas.

Because of the importance of streams and wetlands, they've been protected for years by different regulations. The ONF promised to protect these in its 1989 Forest Plan. The Northwest Forest Plan and PacFish added more protection. Both require that all wetlands, streams and adjoining areas be designated as special reserves where the health of these ecosystems is the first priority in all management decisions.

Other agencies are protecting their riparian areas. Many prohibit recreational grazing in wetlands and streams. Some require grazing permits which designate specific grazing areas to be used and fragile wetlands are off-limits. Sensitive areas like wetlands are sometimes closed to stock and/or overnight camping. Horse groups are often encouraged to pack in horse feed. Almost all restrict group size to 12 total, people and animals. This alone significantly decreases grazing impact.

A number of sensitive plant species and a unique boreal ecosytem have also been identified in areas where this heavy grazing is allowed. These, by law, should also be protected. When will the ONF comply with these regulations?

Cotton-grass and pool in an ungrazed wetland

Cotton-grass and pool in a heavily grazed wetland

Part VI: Two Management Areas within the Pasayten

Management Directives for The Pasayten

All the Pasayten was classified as "**primitive**" in the spectrum of recreational opportunities. This means, visitors have a very high probability of experiencing solitude, closeness to nature, tranquillity, self-reliance, challenge and risk. Little interaction should occur between visitors, and other visitors should not be apparent.

All the Pasayten was also designated as "**wilderness**" so management should comply with the Wilderness Act. It's non-degradation and restoration policies require that the management priority be the protection of wilderness resources and values. While it recognizes that some areas are more pristine than others, it says these areas should be managed and restored so they will become pristine over time.

The Two Areas, 15A and 15B

In its 1989 Forest Plan, the ONF divided the Pasayten into two areas. About 18% was designated as trailless, which was called the 15A areas, while the rest was designated as trailed, called the 15B area.

ONF's Management of the 15B Areas

In the 15B area, ONF seems to have one priority, maximizing recreational use and meeting the needs of commercial outfitters. In our 1999 study area, a 15B area, significant and wide-spread resource damage is being tolerated to keep these folks happy.

Some parts were like car campgrounds except transportation is by horse instead of auto. Campsites dotted the land; each with big tents. Some even had folding chairs and tables. These areas bustled with human activity; people chopping wood, visiting other camps, tending horses, sitting around big campfires circles. These aren't wilderness scenes.

ONF's Management of the 15A Areas

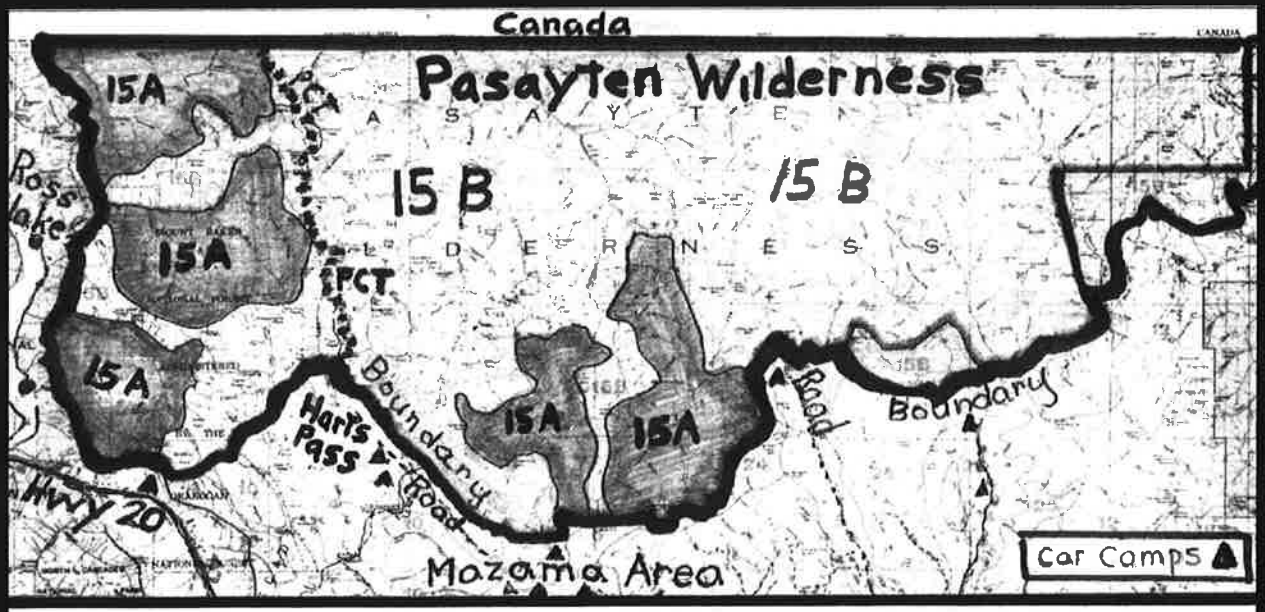
The ONF acknowledges that the 15A areas should be managed as wilderness. There aren't supposed to have trails. Outfitters with stock can't use them. Yet the ONF is permitting degradation here too. Commercial outfitters leading backpack trips can and do operate in 15A areas. All summer these outfitters bring groups of 12 often boisterous young people into the "pristine" areas. The degradation in 15B areas also drives people looking for wilderness into 15A areas. So trails are forming and campsites are increasing in number and size. This threatens some of the best wolverine habitat in the Pasayten.

Wildlife Resources and the 15A & 15B Areas

It appears that the sole criterion used to designate the 15A and 15B areas was recreation. Most of the Pasayten is 15B, 82%. It is in one large contiguous block and contains all the remote areas, popular camping areas, and recognized trails.

Meanwhile the remaining 18% was chopped up into five separate 15A areas that are neither remote or contiguous. These small islands are located right next to wilderness boundaries. Some are close to high use areas like Mazama and Hwy. 20. Most are west of the Pacific Crest Trail. f None include the unusual ecosystems in the northeastern parts of the Pasayten.

The size, location, and management of 15A/15B areas all significantly reduce the value of the Pasayten for wildlife, which is an important wilderness resource. The Pasayten is no refugia for species requiring large habitat areas with minimum human contact such as the wolf and grizzly. It's hard to imagine stable populations living in the Pasayten under current management. If the Pasayten isn't a recovery area for these species, where ARE they supposed to survive? I have many other places to go. So do outfitters. We'll survive. Will they?



Map of the Pasayten Wilderness. The five 15A areas are outlined in gray. Everything else is the large 15B area.

Part VII: Commercial Outfitters

Background

Before the Pasayten became a Wilderness it was used by commercial outfitters with livestock. While the Wilderness Act generally prohibits commercial enterprises, it allows for some exceptions. This is why many outfitters still operate here.

They are managed with special use permits that are renewed every five years. Their activities are legally required to meet all standards of the ONF Plan as amended by PacFish and the Northwest Forest Plan, as well as the Wilderness Act.

More recently commercial outfitters of backpack groups have also been given permits to operate in the Pasayten.

Commercial outfitters have had considerable influence on management of the Pasayten. They were instrumental in having the group size be 12 + 18 heartbeats rather than the usual 12. They argued that they needed large groups to be profitable.

Commercial outfitters also oppose regulations that would prevent them from grazing their animals in stream corridors and wetlands. Their considerable political power is also a reason why they are allowed to continue using old camping techniques that cause unnecessary damage.

Problems

Horse outfitters have been violating wilderness regulations for years. They seem to have no qualms about cutting live trees and tree branches for tent poles as well as fires.

This summer one outfitter cleared all the trees from a large area near his tent to make a bigger opening. He also made a network of new trails throughout the woods and meadows near his camp. The same outfitter cut large trees and dragged them back to his camp. There he made them into the campfire furniture as seen in the photo to the right.

Outfitter camps have very large tie areas. This should be expected since they bring 18 horses and mules with them. Manure is deep. Dozens of trees have damaged roots and trunks.

From Wilderness Rangers' Report, 1995

"Hikers were most concerned about impacts from horse users, most frequently with the amount of manure in campsites and resource damage from containment methods. Horse users are most concerned with regulations which may restrict horse use. Both user groups expressed concern about the size of outfitter guide groups and the frequency of encounters with them."

(Summary after about 2000 field contacts)

My Journal

Outfitters cut live trees for tent poles. Some of their poles still have branches with live needles growing from them. Since the same size tree is always cut for these poles, we're getting very good at finding the matching stumps. Seeing this and the old canvas tents takes me back 50 - 60 years. I remember sleeping on cut boughs in those days.

In camps just vacated by outfitters, we found many violations; pieces of live trees they'd cut, a latrine left only partially covered, a campfire still smoldering and flaring up in wind gusts, live branches cut off trees.

Low-impact camping practices are also ignored. Food is often cooked over campfires. Some still pack in the old wood burning stoves. Heavy gear is used. Horses are often tied to trees. One outfitter did have a highline, but it was improperly installed. His pawing horses were still digging out the roots of trees

Furniture being constructed at Camp #3

Our noses led us to this partially covered latrine. An outfitter had just vacated the camp. Lots of TP, etc. A live tree was cut and thrown on top .

Compatibility with Wilderness Values

It must be asked if the outfitters' guided trips are appropriate uses of a wilderness. These trips cannot be described as "primitive" recreation as defined by the Forest Service and Wilderness Act.

Clients hire outfitters to take the wilderness and primitive out of their trip to the Pasayten. They aren't looking for risk and challenge. They don't want to develop wilderness skills or self reliance. Outfitters provide sprawling camps for them, sometimes with furniture. Clients relax as staff set up tents, cut wood, build fires, and cook. We saw camps with cases of beer and a bar with wines and liquor. Their schedule of activities sounds like a summer camp. One outfitter even provided boats. In July we glanced down at Cornwall Lake and saw a fleet of brightly colored inflatable boats. Other campers told us how surprised they were to see these boats on Remmel Lake.

Outfitters thrill their summer clients with tame deer attracted by salt licks. In the fall their clients are hunters who pay to see these tame deer.

Drop Camps

Outfitters provide another service called "drop camps". For a fee outfitters pack people and all their gear into the wilderness. They'll even provide the gear and set up the camp. The clients are left there until they wish to be packed out.

All that is needed is money to vacation anywhere in the Pasayten. Clients don't need to hike long hours, carry a pack, learn wilderness skills, to visit even the most remote parts of the wilderness.

It must be asked if it is even wise to "drop" people in a large wilderness area if they don't have these skills. Is it safe for them and the wilderness? The drop camp client seen hiking with a gun guessed he needed it for bears. Outfitters should be responsible for their clients, meaning if they pack people in they should stay with them. The unique values of large wildernesses for people and wildlife are lost when outfitters make it easy for everyone with money to reach any area. Commercial transportation defeats the whole point of wilderness designation.

From a 1995 Wilderness Ranger report:
"There were several drop camps of horse outfitters which obviously were unaware of wilderness regulations and minimum impact ethics. Cutting green trees, escaped campfires, and poor campsite selection were the most common problems."

Management of Commercial Outfitters

Outfitters told us they are too closely regulated; that it is the private horse groups that cause problems. We didn't find this to be true. Outfitters were violating regulations and ignoring low-impact camping techniques more than the private groups. ONF could reduce priority use days and revoke permits for violations. But it hasen't yet.

Many people look to commercial outfitters as the experts, some learn their outdoor skills from them. People also assume outfitter practices are sanctioned by the Forest Service since they have permits.

Government Subsidy

Fees paid by stock outfitters don't cover the costs of managing their permits or repairing the damage they cause. Their continuous trips in and out of the Pasayten means more trail maintenance. Fees don't cover the cost of lost wildlife habitat and degraded watersheds, or pay for restoration of areas they degrade. Commercial use of the Pasayten is a government subsidy. Should we be supporting these businesses?

"Choices are required when electing to recreate in wilderness. One can acquire the equipment and skills to travel on ones own or take the option of employing an outfitter-guide to provide equipment and services to wilderness travel. Very few people, except for age or health reasons are not able to make this choice. By its nature good outfitting and guiding services provide convenience and a degree of insulation from the wilderness experience."

(Deschutes National Forest Plan (4-110)

Part VIII: Other Parts of the Pasayten with Similar Problems

As soon as we started working in our study area, people from the ONF told us we were just seeing a high use area, implying the rest of the Pasayten was in much better condition. We do plan to study more parts of the Pasayten each summer. Meanwhile, there are many indications that other areas are also seriously degraded. References to similar problems are found in Forest Service reports. Outfitters also use other parts of the Pasayten, probably in the same way.

Other Areas with Heavy Outfitter Use

Outfitters use other parts of the Pasayten. We suspect these are also degraded. There is a permanent camp at Sheep Mountain. Commercial outfitters use Hidden Lakes, Tungsten Mine, McCall Gulch, the Middle Fork of the Pasayten River, and Corral Lake area. Hunters are dropped for a week or more at numerous locations; Coleman Ridge and Peepsight areas, Apex Pass and McCall Gulch, and places reached from Hart's Pass like Ferguson Lake. There's every reason to believe that areas with heavy outfitter use are alsodegraded.

Wilderness Ranger Reports

Each summer after wilderness rangers complete their work in the Pasayten, they write reports summarizing what they saw. These reports include many accounts of degradation in other areas. Black Lake, Hidden Lakes, Corral Lake, McCall's Gulch, Andrews Pass, Ferguson Lake, and Airview Lake are frequently mentioned.

In a 1989 report, it was noted that re-vegetation was needed at Corral Lake, Andrews Pass, Sheep Lake, and Quartz Lake. The same year Fred's Lake, Ferguson Lake, and Goat Lake Basin were listed as over-used and still needing revegetation.

In 1993 horse groups told a ranger that overgrazing and abuse were occurring at Crow Lake, Andrews Pass, and Chandler Camp. The same year a ranger wrote that camps at Airview Lake should be closed. Another ranger wrote "existing primary camp sites at many lakes are blatant examples of what we don't want or even allow".

From a 1993 Wilderness Ranger Report

"August use, especially horse use from Chewach drainage trailheads, appeared to be way up from the '84 level. This high mid-summer occupation, happening on a very wet year, and on trails in need of maintenance, caused significant degradation of trails, of some graze areas, and of soft areas such as Crow Lake shoreline."

"Trails were fairing very poorly, and in some cases, perhaps irreparably. Some recreational grazing areas were also hit early, hard, and continuously."

"Use limits on focal areas will likely need to be reinstated in the near future. Limits are past due in some spots and abuses that do not repair over winter are cumulative."

Concerns from rangers and the public about commercial outfitter use in 15A areas was part of a 1993 report. Problems mentioned included drop camps, large party sizes, and user-created trails. In 1994 a ranger visited two previously pristine mountain lakes. He wrote of considerable human impact from backpack outfitters over the last 10 years. He questioned why backpack outfitters are allowed to take large groups into 15A areas when these areas are supposed to be pristine and trailless.

A 1994 Wilderness Ranger Report written after visiting two previously pristine mountain lakes.

"With the advent of physically aggressive, mountaineering oriented, commercial backpack schools/outfitters, the pristine character of both places has been substantially diminished under the pressures of perhaps hundreds of visitor days and nights per year. All of those mouths to spread praise and a second wave is born. Virtually all of the (admittedly few) private parties whom I have heard even mention either place in the last two summers had heard about the splendors therein from people with one of the two commercial "schools" that regularly pump hikers through the fragile, once pristine environs."

In 1993, another problem was noted in 15A areas. Signs were seen of illegal entries from Canada into 15A areas by mountain bike, horse, and hiking.

In 1995 a wilderness ranger again wrote that permits were needed in the Pasayten. He had said this before. He even proposed a plan that sounded simple and effective.

In 1996 a report noted that 33% of all voluntary trail registrations in the Pasayten were logged at Hart's Pass. That year was also reported as another year of late snow and caused significant resource damage occurred due to heavy stock use on wet soils.

Problems were reported at McCall Gulch and Corral Lake in 1997. Private horse groups complained to rangers that the Corral Basin was overgrazed. Too much traffic was noted near Corral Lake, with a substantial amount from commercial outfitters. The traffic created by horse packers re-supplying commercial backpack trips was also mentioned. The same report described two other problems near Corral; horse groups, including commercial outfitters, cutting switchbacks and creating new trails.

In 1998 a wilderness ranger wrote that while he was against a lot of regulations, he felt it was time to prohibit

campfires at higher elevations and restrict grazing. Does the ONF ever listen to its rangers.

ONF 1994 Wilderness Monitoring

Every 4 years the ONF monitors conditions in the Pasayten to determine if they meet wilderness standards. The first report was in 1994. It reported that some places were failing. Included in this list were Goat Lakes, Andrew Pass, Tungsten Mine, and Hopkins Lake. The report also said trail work was needed at Corral Lake, Crow Lake, Ramon Lake, Three Forks, and Fish Camp. It said campsites near Louden Lake and Sunny Pass were out of compliance. Nine of fifteen sites checked for the report failed to meet standards.

Yet this report concluded that less than 1% of the Pasayten was not meeting standards. This figure is questionable.

The Lost River and Robinson Creek Watershed Analysis of 1996

A focused watershed analysis was prepared for the Lost and Robinson watersheds in 1996. While it's purpose was to analyze impacts of controlled burns, recreational use was mentioned and concerns about its impacts were expressed.

Authors were worried about impacts at "the favored camping spots near lakes, streams, and passes." It also reported heavy use of some trails. It was noted that recreational use will continue to increase. Interestingly, it stated that the trend was to larger hiker and horse groups. "Entry points at Robinson Creek, Lost River, 8-mile Pass and Billygoat Pass account for about 25% of the total entries into the Pasayten Wilderness," it reported. Both of these watersheds are outside our study area. This suggests there may be compliance problems in Robinson and Lost River drainages.

The Chewuch Watershed Analysis, 1994

This watershed analysis was prepared to give a comprehensive assessment of the watershed. It emphasized the importance of sub-alpine streams and wetlands as unique wildlife habitats and important water storage areas for the Chewuch watershed. It reported that the Chewuch has more wetlands than many nearby watersheds and said most of these are in the upper reaches of the Chewuch and its tributaries. That's the Pasayten Wilderness!

Concern was expressed over the condition of these wetlands. It was suspected that they were degraded from grazing pack animals. Upper tributaries of the Chewuch include include Lake, Eightmile, Windy, Andrews, Tungsten, Horseshoe, and Twentymile Creeks, which are all outside our study area.

From the Chewuch Watershed Analysis

"Pack stock use is a major recreational activity in the watershed. Anecdotal evidence provided by district personnel indicates that this use is impacting high elevation wetlands and bogs, critical water storage areas for the Chewuch. More detailed information is needed to determine the extent and nature of these impacts." (Page 169)

Conclusion

These are but a few of the references to problems in other parts of the Pasayten that I've found. I was told that wilderness rangers are the ONF's eyes and ears in the Pasayten. If this is so, their observations and their requests for added restrictions are especially disturbing. Why hasn't the ONF responded? The only management change I've found is one new CFR. It prohibits cutting switch-backs.

Employees who wrote the watershed analyses haven't followed up on their concerns either. Grazing and intensive recreational and outfitter use continues in areas where sensitive plant species and the unique boreal ecosystem of hummocks has been documented.

About wildlife habitat in the Chewuch watershed:

"Though most of the northern two-thirds of the Chewuch is unroaded, there are 195 miles of trails that allow both human and stock access. For instance, though much of the Lake, Andrews, Upper Chewuch, Tungsten, Horseshoe, Windy, and Twentymile areas are unroaded, they can be accessed by a network of interconnecting trails. Combining that trail network with no upper limit on visitor use numbers means there is a lot if wildlife disturbance occurring in what is generally thought of as a wildlife 'refugia' in the Pasayten Wilderness and roadless areas.

(from the 1994 Chewuch Watershed Analysis)

Part IX : Legal Questions

There is little doubt that the ONF is out of compliance with many standards and and goals in its management of our study area. There's also good reason to believe this is true in other parts of the Pasayten. It's also clear that the Okanogan National Forest (ONF) has known about the degraded conditions for years. This section looks at the legal implications of the ONF's failure to protect the Pasayten.

PacFish, Management of Riparian Areas:

RM-2 "Adjust dispersed and developed recreation practices that retard or prevent attainment of Riparian Management Objectives or adversely affect listed anadromous fish. Where adjustment measures such as education, use limitations, traffic control devices, increase maintenance, relocation of facilities, and/or specific site closures are not effective..... eliminate the practice or occupancy. (C-13)

Specific Management Documents

Riparian areas in the Pasayten, the streams and wetlands, should be managed according to directives in **PacFish** and the **Northwest Forest Plan**. These are designed to protect and improve the health of watersheds by designating areas around streams and wetlands as special reserves. Activities that might degrade these reserves are to be prohibited. Restoration is to occur where needed. The ONF is not implementing these directives in the Pasayten.

Wildernesses should be managed according to the **Wilderness Act** and sections of **Forest Service Manual** that implement it. These require a policy of non-degradation, meaning there should be no additional resources damage. It also requires that managers continually move their wildernesses toward their most natural condition. (called "purity") Management decisions should consider wilderness values first, not commercial and recreational interests. The ONF isn't following these mandates. It also isn't protecting wildlife resources.

The **National Forest Management Act** of 1976 directed forests to protect water quality and riparian habitats. It also said viable populations of native wildlife species are to be maintained by providing the necessary habitat. The ONF is not doing this.

The 1989 **ONF Resource and Land Management Plan** (the ONF Plan) also contains Standards and Guidelines for managing the Pasayten. Forest-wide standards require the protection of riparian areas and threatened species. Additional standards should protect the Pasayten. These are ignored.

The **Endangered Species Act** also directs the Forest Service to protect habitat of sensitive and endangered plant and animal species. ONF is dragging its feet on the Grizzly Recovery Plan and ignoring findings of sensitive plant species.

The ONF knows about these problems

As shown in the last section, many ONF documents indicate knowledge of compliance problems. This leads to the question: why hasn't it compled with various plans and acts?

When will the ONF address these issues?

It's not clear whether the ONF will address these problems anytime soon. this will depend on staff motivation Meanwhile other forests are doing something about similar problems in their wilderness areas. The Gifford Pinchot National Forest just completed an environmental analysis (EA) of its wildernesses. As a result, it's providing more protection for natural resources. The Deschutes is looking at its wildernesses to determine if it needs to do the same thing. Wenatchee & Mt. Baker-Snoqualmie already have a new plan for The Alpine Lakes Wilderness The public must ask ONF to do the same.

From the **Forest Service Manual** on implementation of the Wilderness Act :

"Manage wilderness toward attaining the highest level of purity in wilderness within legal constraints." (Purity is the condition with no human influences.)

"Where a choice must be made between wilderness values and visitor or any other activity, preserving the wilderness resource is the overriding value. Economy, convenience, commercial value, and comfort are not standards of management or use of wilderness. Because uses and values of each area vary, management and administration must be tailored to each area. Even so, all wilderness areas are part of one National Wilderness Preservation System and their management must be consistent with the Wilderness Act and their establishing legislation." (from FSM, Section 2320.6)

Part X: Solutions

The ONF could comply with the laws by changing its management of the Pasayten It's time to adopt new CFRs prohibiting activities that cause degradation. CFRs need to be backed by serious enforcement. The ONF now has the opportunity to eliminate damage from commercial outfitting. Five permits are up for renewal in year 2000. The ONF needs to use new strategies such as closing areas of unique wetland ecosystems to stock use. Impacts of recreational use across the Pasayten must be addressed by preparing an EA or EIS. It's time to publicly analyze and disclose the areas of non-compliance, then solve these problems.

When renewing the 5 outfitter permits this winter: (using money budgeted for outfitters not wilderness)
Prepare an environmental analysis (EA). Impacts to wetlands and threatened species are too significant to resolve quickly. Grant one year permit extensions in year 2000 so there is sufficient time and money to prepare an EA. These extensions should have new requirements to stop the worst degradation.

Adopt new CFRs to prevent further resource damage:
- ✳ Adopt a CFR prohibiting recreational livestock grazing in riparian reserves.
- ✳ Adopt a CFR prohibiting damage of trees when tying stock. (Chelan/Sawtooth already has this CFR.)
- ✳ Adopt a CFR prohibiting fires above 6000 feet and a CFR prohibiting cutting snags and all but downed wood.

Adopt new management practices that will decrease degradation:
- ✳ Increase the time wilderness rangers spend monitoring compliance with CFRs. When violations occur use enforcement and penalties. Decrease the time they spend logging and brushing trails and carrying out garbage until users stop abusing the Pasayten. If rangers rode horses they could cover more area.
- ✳ Begin establishing designated campsites for all horse users. Have an ID team develop criteria for locations that minimize resource damage. Begin this year by designating campsites for outfitters.
- ✳ Prohibit all commercial outfitter use in 15A areas, including backpacking groups and drop camps.
- ✳ Spend more of the trail budget on re-routing and closing trail sections that damage wetlands and closing unnecessary and excess trails. Spend less on opening trails as early as possible each year.

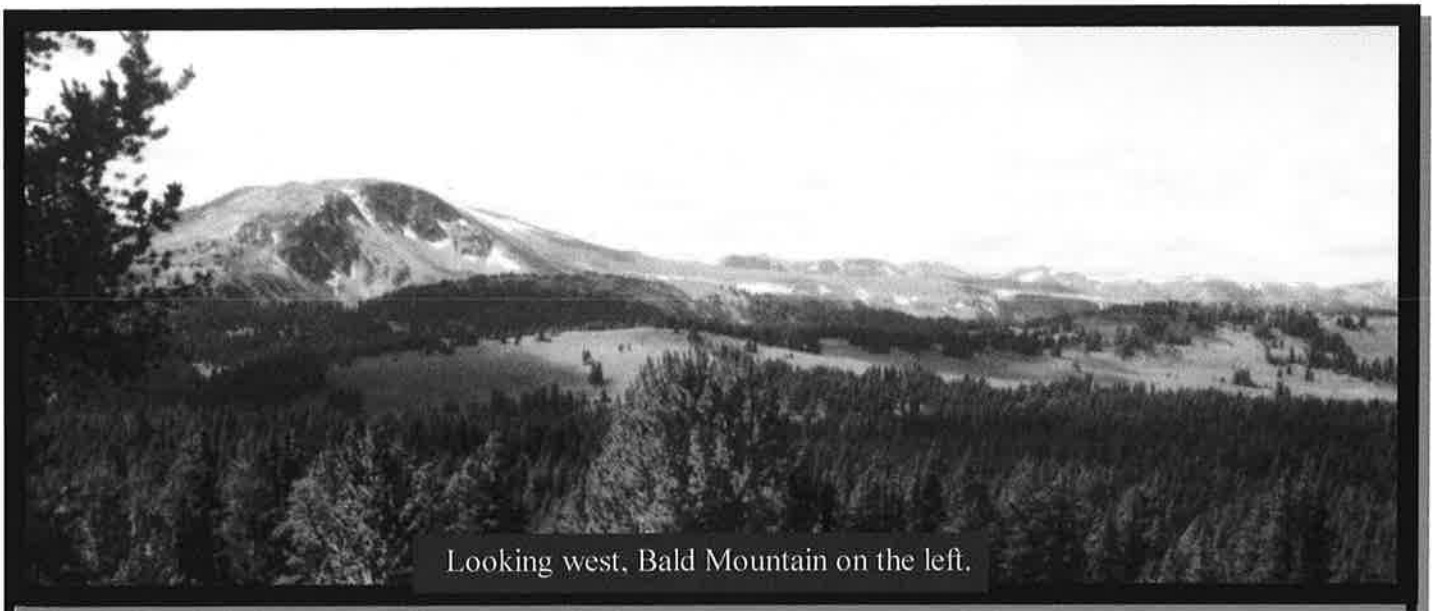
Prepare an EA to address impacts from recreational and commercial use of the Pasayten.
- ✳ Analyze and disclose the current condition of the Pasayten, something that has never been done. Address major issues like group size, the high density of trails, grazing, management of riparian reserves, the role of commercial outfitting, the large numbers of horses/mules and their impacts, and 15A/15B areas, their location, size, purpose. Analyze and disclose recreational impacts on threatened species and their habitat. Adopt management practices that will bring the Pasayten into compliance with the laws governing wilderness areas.

Improve the management of commercial outfitters (using outfitter funds, not wilderness funds)
- ✳ Closely monitor outfitter compliance with CFRs, the ONF Plan, and low impact camping skills. If violations occur, decrease priority use days and revoke permits.
- ✳ Follow the guidelines for approving over-sized parties. These are now being ignored.
- ✳ Require outfitters to store bear attractants properly, as requested in the Grizzly Recovery Plan. When their permits were last renewed, education was part of mitigation. It's time for compliance.
- ✳ Prohibit salt licks, open latrines, and burying garbage; all practices that attract and habituate wildlife.
- ✳ Limit or prohibit drop camps. Require outfitters to stay with and be responsible for all groups they pack in.
- ✳ Require outfitters to practice low-impact camping skills as the professional models for clients & the public.

A request for more regulations from the wilderness ranger who doesn't like regulations:

"The first is the banning of fires above a certain elevation. In some of the more frequently visited subalpine areas, production of dead and downed wood is much slower than its consumption by visitors.

The second is very similar. In some high elevation and otherwise fragile areas, I think it might be wise to regulate or ban the grazing of livestock..... This also may encourage horse packers to use more resilient areas." (From his 1998 Report)



Looking west, Bald Mountain on the left.

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Contact Martha Hall c/o the above groups.
We welcome comments, suggestions, and offers of help.
We're especially interested in hearing about resource damage you've seen in the Pasayten.

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