

**Needs Analysis  
Commercial Recreation Uses  
Sisters Ranger District  
Deschutes National Forest**

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**COMMERCIAL USE NEEDS ANALYSIS*****Sisters Ranger District  
Deschutes National Forest***

**Background:** The Sisters Ranger District has over 30 commercial users operating on the District under special use permit. These uses range from horse packing outfitter guiding to institutional guides such as parks and recreation departments, organization camps, stores and a resort.

Every year, many new proposals for commercial uses are made to the District. Management direction as given in the Deschutes National Forest Land and Resource Management Plan of 1990 states to authorize new uses only where there is a demonstrated public need.

To determine if there is a demonstrated public need, a needs analysis and determination must be done. This document serves as a needs analysis that covers the Sisters Ranger District. Its purpose is to assist in the management of new and existing commercial special uses by identifying potential uses that would have a demonstrated public need.

**Definitions:** A needs analysis and determination is a methodology for determining if in fact there is a "need" for private enterprise to assist the Agency, as well as to determine the amount of concessionaire assistance required to provide access, facilities, accommodations, products, services and/or other assistance for the using public in order to properly manage recreation on public lands. This determination is made by the Agency.

Need (also called public need or management need) for concessionaire assistance works on the premise that concessionaires are public service agents, and the numbers will be limited to the number and type that are needed to achieve identified goals and objectives of the Agency while assuring economically viable operations. It is based on identified (or demonstrated) needs for access, facilities, accommodations, products, services, & assistance as well as identified needs for resource protection, public safety, and public education based upon stated objectives. A needs determination can be initiated internally, or externally via an application.

The needs analysis is the basis for approving or denying applications for providing concessionaire services. If there is no need, there can be no allocation, and applications are denied.

A prospective outfitters desire for a permit does not constitute public demand or a public need, nor does market generated demand (solicited calls/letters) by a potential applicant constitute public demand or a public need.

**Procedure for Identifying Demonstrated Public Need:**

On the Sisters Ranger District the needs analysis process was preformed by first looking at management restrictions and opportunities as listed in current land management plans and Forest Service manual policy. These restrictions or opportunities were compared to existing commercial recreation services. By a process of elimination, needs that are not being met by existing guides for public health and safety, and Forest Service management goals, but are allowed by the management plans were listed as possible commercial opportunities.

**Opportunities and Restrictions for Commercial Uses in Land Management Plans:**

In the Sisters Ranger District some opportunities and restrictions for commercial use are given by management direction in the 1990 Deschutes National Forest Land and Resource Management Plan (Forest Plan) and the May 1997 Metolius Wild and Scenic River Plan Record of Decision (River Plan). Additional direction is given in Forest Service manuals and handbooks.

**The following are management direction for commercial uses from the Forest Plan:**

- SU-17 Authorize special use permits for concession developments only where there is a demonstrated public need. (Also references Forest Service Manual (FSM) 2340).
- SU-19 Do not issue a special-use permit either solely for the purpose of establishing a profit making commercial enterprise or where satisfactory public service is or could be provided on nearby private or other public lands. (Also references FSM 2343.03).
- SU-20 Incorporate as many needed public services as possible under existing special-use permits (e.g., fishing guide permits under a resort permit).
- SU-25 In general, no new permits for commercial services will be issued in campgrounds or any other developed sites. This includes all types of food services, selling fishing equipment, worms, etc. Selling firewood in campgrounds may be appropriate in some circumstances. An exception to this policy exists on the lower Metolius River near Lake Billy Chinook where a small store may be needed to meet the needs of recreationists.
- SU-26 The base of operation for special uses should be on private land when possible. Destination resorts located on private land should supply the base area for permittees providing service for their guests or residences. (Also referenced in FSM 2703 and 2740.3).
- SU-27 No commercial rafting will be permitted on the Metolius River.
- SU-28 Outfitter/guide services in Wilderness will be permitted until local limits of acceptable change and carrying capacity estimates are met or exceeded. At that point outfitter/guide services in Wilderness will be reduced or eliminated in those areas.
- SU-29 No new permits will be issued for providing outfitter/guide operations in Wilderness.
- SU-30 Expansion of use by existing outfitter/guides will be authorized only for areas outside Wilderness.
- SU-33 No new outfitter/guide permits will be issued for fishing or horse packing unless (1) changes in demand are demonstrated, and (2) existing outfitter/guide operations cannot expand to service demonstrated needs.
- SU-34 The number of special use permits for a specific use will be limited as much as possible to create economical operations which provide a high quality of public service.
- SU-44 With the exception of Suttle Lake Resort, existing resorts will not significantly expand beyond their permit boundaries. While some new facilities will be built, most construction will be in accordance with existing site plans or involve repair and replacement of existing structures.
- SU-45 No new resorts will be authorized, with two possible exceptions: (1) Skyliner Lodge and (2) a backcountry "hut" system.
- M6-79 If an existing outfitter/guide permit is sold or the permittee goes out of business the Forest Service will evaluate the following options for the service days authorized by that permit:  
Allocate the service days to one or more of the remaining outfitter-guide permittees if it would strengthen their business, improve the quality of customer service and/or benefit the Wilderness resource.  
Do not re-allocate the service days if non-outfitter/guide use levels and LAC (limits of acceptable change) data show that the thresholds of unacceptable change/impacts are being approached or exceeded.

Consider allocation of the service days to a new permittee only if an acceptable trend in impacts from use is reasonably clear and can be expected to last for several years into the future. New permittees must be identified through issuance of a prospectus and subsequent competitive selection.

M6-80 Of the summer and winter outfitted use in the Forest's Wilderness some potential for growth exists:

Winter use is at a very low level and may have many years to expand before limits on numbers are necessary.

Some potential may exist for expanding non-livestock supported educational programs. These must be evaluated on a case by base basis. (Note: since the Forest Plan, several parks and rec departments and community colleges that were historically operating without permits were put under institutional outfitter/guide permit, so this potential may not exist).

M6-84 Existing permittees may be expected to provide services in other areas of the Forest, outside their normal operating area.

**The following are management direction for commercial uses from the Metolius Wild and Scenic River Plan, Record of Decision:**

Summary of Decisions and Reasons (page 4):

Applications for nondevelopment special uses are considered if they have a negligible impact, can be contained within existing facilities, do not displace general public, do not advertise or promote (directly or indirectly) the area, and are non-recurring.

Applications for commercial, nondevelopmental special uses must respond to both the demonstrated need criteria and the negligible impact criteria.

Response to Significant Issues; Issue #9 - What is the appropriate role of commercial and other special uses in the river corridor? (page 15).

The non-commercial character of the river is a part of the Metolius recreation experience. Protection of this recreation experience as well as the river's natural resources and availability of recreation space for general public use were the primary considerations in my decision regarding the management of special uses. I (Forest Supervisor) will consider permitting commercial special uses and special uses which involve development only when they respond to a demonstrated need. Special uses which do not involve development may be appropriate in the corridor as long as they have a negligible impact on natural resources and existing uses. I have established criteria which will be used to evaluate proposals for their consistency with this intent. (Criteria is listed in MTSU-1 and MTSU-2).

Standards and Guidelines for Managing Special Uses (page 12).

The non-commercial character of the river is an important part of the recreation experience. Opportunities for new commercial uses are very limited. Protection of the natural resources, recreation experience, and availability of recreation space for general public use are primary considerations in managing special uses. Uses that would establish an expectation for or dependency on using the river are avoided.

MTSU-1 Commercial special uses and special uses which involve development (placement of fixed improvements) may be permitted if they respond to a **demonstrated need**: 1) are necessary for the health and safety of the public, 2) are necessary to accomplish a specific goal of this Plan, 3) fulfill an agency management and administrative role, or 4) involve the study or research of values unique to the Metolius.

MTSU-2 Non-commercial special uses that don't involve development may be permitted if they have a *negligible impact*: 1) can be contained within existing facilities, 2) do not displace general public use, 3) do not advertise or promote in a manner that is likely to draw visitors to the Metolius who are not managed under the special use permit, and 4) do not recur on a regular basis.

MTSU-3 The criteria in MTSU-1 and MTSU-2 apply to new uses and changes to existing uses. They are not applied to the reissuance of permits for existing uses or uses which do not require permits.

### Forest Service Manual and Handbook direction:

These policies and directives are very broad as they apply nationally to all Forest Service Ranger Districts.

#### FSH 2709.41.53a Objectives

1. As identified in forest land and resource management plans, provide for commercial outfitting and guiding services that address concerns of public health and safety and that foster small businesses.

#### FSH 2709.41.53b Policy

1. Authorize only those outfitting and guiding activities that are consistent with forest land and resource management plan.

### Existing Commercial Recreation Uses on Sisters Ranger District:

The following commercial recreation uses have special use permits to operate on the Sisters Ranger District. Many operate on multiple districts and the service day shown may reflect the use on several forests. Some of the users operate only on the Sisters Ranger District, especially ones with facilities such as stores, marinas, etc.

#### Commercial Recreation Permits - Sisters Ranger District October 1998

#	Guide Name	Area of Use	Type of Use
		SD = Service Days	
1	Black Butte Stables	non-wilderness 13,000 SD 3 Sisters Wilderness Mt Washington Wilderness Mt Jefferson Wilderness 370 SD wilderness	Horse packing, camping, wilderness travel, nature observation, drop camps
2	Linfield College	non-wilderness 3 Sisters Wilderness 130 SD	Winter camping and mountaineering, including backcountry travel, skiing, avalanche training, cooking, climbing, and gear
3	Outward Bound	3 Sisters Wilderness Mt Washington Wilderness	Outdoor skills, backpacking, camping, climbing, fishing, survival, safety, wilderness skills, personal

		Mt Jefferson Wilderness 5162 SD (3048 on Sisters)	character building, team building, nature study rafting, canoeing
4	Northstar Center	non-wilderness ?? SD	Youth at risk counseling and training using outdoors as a classroom, also teaching outdoor skills camping, backpacking, climbing.
5	Central Oregon Community College	3 Sisters Wilderness Mt Washington Wilderness Mt Jefferson Wilderness non-wilderness	Institutional o/g - backpacking, climbing, hiking, nature study, snowshoing, nordic skiing, canoeing, more?
6	Bend Metro Parks and Recreation Department	3 Sisters Wilderness Mt Washington Wilderness Mt Jefferson Wilderness non-wilderness 2700 SD 300 wilderness	Institutional o/g - backpacking, climbing, hiking, nature study, snowshoing, nordic skiing, canoeing, more?
7	Portland Parks and Recreation Department	3 Sisters Wilderness Mt Washington Wilderness Mt Jefferson Wilderness non-wilderness	Institutional o/g - backpacking, climbing, hiking, nature study, snowshoing, nordic skiing, canoeing, more?
8	Tualatin Parks and Recreation Department	3 Sisters Wilderness Mt Washington Wilderness Mt Jefferson Wilderness non-wilderness	Institutional o/g - backpacking, climbing, hiking, nature study, snowshoing, nordic skiing, canoeing, more?
9	Eugene Parks and Recreation Department	3 Sisters Wilderness Mt Washington Wilderness Mt Jefferson Wilderness non-wilderness 195 SD W, 90 SD NW	Institutional o/g - backpacking, climbing, hiking, nature study, snowshoing, nordic skiing, canoeing, mtn biking,
10	Sisters Organization for Activities and Recreation SOAR	non-wilderness 220 SD	Institutional o/g - backpacking, climbing, hiking, nature study, snowshoing, nordic skiing, canoeing, more?
11	Lane Community College	3 Sisters Wilderness Mt Washington Wilderness	Institutional o/g - backpacking, climbing, hiking, nature study, snowshoing, nordic skiing, canoeing,

		Mt Jefferson Wilderness non-wilderness	more?
12	University of Oregon Outdoor Pursuits Program	3 Sisters Wilderness 117 SD non-wilderness 78 SD	Mountain climbing, hiking, backpacking, nature study
13	American Alpine Institute	3 Sisters Wilderness Mt Washington Wilderness Mt Jefferson Wilderness 64 SD	Guided mountain climbing, ice climbing, rock climbing
14	Timberline Mountain Guides	Mt Jefferson Wilderness 3 Sisters Wilderness 80 SD	Guided mountain climbing, ice climbing, rock climbing
15	Wilderness Ventures	Mt Jefferson Wilderness 3 Sisters Wilderness 750 SD	Outdoor skills, backpacking, camping, climbing, fishing, survival, safety, wilderness skills, personal character building, team building, nature study
16	Oregon Llamas	Mt Jefferson Wilderness 3 Sisters Wilderness	Llama packing, camping, nature study, wilderness skills,
17	The High Desert Museum	3 Sisters Wilderness Mt Washington Wilderness Mt Jefferson Wilderness non-wilderness	Institutional o/g - backpacking, climbing, hiking, nature study, snowshoing, nordic skiing, canoeing, more?
18	Outdoor Adventures Plus	3 Sisters Wilderness 44 SD wilderness 49 SD nonwilderness	Outdoor skills, backpacking, camping, climbing, fishing, survival, safety, wilderness skills, personal character building, team building, nature study
19	Camp Tamarack	3 Sisters Wilderness Mt Washington Wilderness Mt Jefferson Wilderness non-wilderness	Horseback riding, camping, hiking, backpacking, wilderness skills? , canoeing,
20	Suttle Lake Methodist Camp	3 Sisters Wilderness Mt Washington Wilderness	Hiking, backpacking, rafting, outdoor skills,??

		Mt Jefferson Wilderness non-wilderness	
21	Round Lake Christian Camp	Mt Jefferson Wilderness	Hiking, wilderness travel
22	Quest of the West	non-wilderness 500 SD	Snowmobile guide service, snowmobiling, nature study, winter travel and safety
23	Pacific Crest Peddlers	non-wilderness 700 SD	Mountain bike guide service, mountain biking, nature study,
24	High Cascade Descent	non-wilderness 556 SD	Mountain bike guide service, mountain biking, nature study, mtn bike travel and safety
25	Wanderlust	non-wilderness 300 SD	Nature study, hiking, interpretive tours ecotours, snowshoing, camping, canoeing
26	Bigfoot Guide Service	non-wilderness (not on Metolius River, Lake BC or Dark Lake) 30 SD	Fishing Guide
27	Deschute's River Outfitters	non-wilderness (not on Metolius River, Lake BC or Dark Lake) 80 SD	Fishing Guide
28	Garrison's Guide Service	non-wilderness (not on Metolius River, Lake BC or Dark Lake) 500 SD	Fishing Guide
29	Sunriver Outfitters	non-wilderness (not on Metolius River, Lake BC or Dark Lake) 75 SD	Fishing Guide
30	Whitewater and Wild Fish	non-wilderness (not on Metolius River, Lake BC or Dark Lake) 75 SD	Fishing Guide
31	Mickey Finn Guide Service	non-wilderness (not on Metolius River, Lake BC	Fishing Guide

		or Dark Lake)	75 SD	
32	Suttle Lake Resort	Suttle Lake Area		Resort, boat rentals, food service, store, fishing gear, camping, cabin rental, camping supplies.
33	Camp Sherman Store	Camp Sherman Area		Store, cabin rental, groceries, camping gear, fly fishing tackle, bike rentals, food service, gas, and fishing gear rental
34	Three Creeks Lake Store and Marina	Three Creeks Lake Area		Store, camping supplies, food, fishing tackle, worms, boat rental.

### **Potential Opportunities for Commercial Special Uses on Sisters Ranger District:**

Through the process of elimination, these uses were identified as not currently existing on the District. Each use is listed and described:

#### **Interpretive eco-tours within existing resorts, campgrounds including boat tours on Suttle Lake and Lake Billy Chinook:**

One existing guide service, Wanderlust, provides ecotours on the District. Most of their business has been on the Bend/Ft. Rock Ranger District. There is an opportunity to expand this business as well as utilize existing permittees in campgrounds and resorts. Ecotours and interpretative tours would provide forest visitors with information on the natural features, current management that may be taking place and help visitors understand the forest better.

At this time no tours are being conducted by boat on Suttle Lake and Lake Billy Chinook. There are opportunities to watch wildlife, discuss geology, forestry and natural processes as well as forest service management of these resources.

#### **Ecotours by mountain bike, horse or foot along the Lower Metolius River:**

This area was identified as an opportunity due to its semi-primitive nature and lack of access by motor vehicle. However, restrictions in the Wild and Scenic River Plan limit the opportunities for commercial uses. This means the uses must not advertise or promote in a manner that is likely to draw visitors to the Metolius who are not managed under the special use permit, and do not recur on a regular basis. This area may be best utilized by existing guides on an occasional basis.

#### **Winter Use in both Wilderness and Non-wilderness:**

Several opportunities exist in both wilderness and non-wilderness for winter activities. Some are identified in the Forest Plan.

#### **Backcountry Hut System:**

This service would provide a system of huts for snowmobiles, skiers and other winter users in the backcountry. The huts would provide overnight lodging, food, and other services such information, equipment and safety for winter users. The backcountry locations would be near the wilderness boundary, to educate users of the wilderness policies in winter, and provide a base of operation for folks wanting a winter wilderness experience. Huts would be located far enough apart to provide a day's travel for those wanting to have multi-day experience.

#### Winter Camping and Touring by snowshoe or ski:

This service would work well in conjunction with the hut system, or could exist alone. Guides would provide equipment, skills, and safety for the public wanting to experience a human powered winter tour. Guides could also focus on winter travel and clothing, including avalanche and emergency procedure. Overnight camping could be in snowcaves, tents, shelters or huts. Other trips could be day trips.

#### Dog sledding or skijoring:

This service would provide a winter experience for those who were not able to ski or snowshoe, but still wanted a semi-quiet winter experience. This use would be restricted by conflicts with other users, especially skiers and snowmobiles.

#### Snowcat tours and groomed nordic trails:

These two uses were combined to utilize the snowcat for both activities. The District at one time had a nordic center at Blue Lake with groomed trails. Due to location and elevation, the success was marginal. The Blue Lake Nordic Center was sold a few years ago and ceased operation. There are existing nordic centers on adjoining ranger districts at Hoodoo Ski Area (McKenzie RD) and Mt. Bachelor (Bend RD).

The potential for this use would be in the higher elevations, above 4500 feet, and closer to Sisters than Blue Lake/Suttle Area. There is private land in the Trout Creek Butte area and Three Creeks Area that could serve as a base for a nordic center. A market analysis and business plan would have to show that another Nordic Center could succeed.

Snowcat tours, would provide an opportunity for visitors with disabilities to experience the winter recreation areas. The snowcat could also groom those areas for other users.

#### Managed Snowplay Area:

There are several unofficial, unmanaged snowplay areas on the Ranger District. It is not known how many safety problems exist at these, but the sledding runs are usually in trees with the potential for accidents. This use is a popular use for families and those who don't know how to ski or don't have snowmobiles.

A managed area would provide a safer area for the public as well as rent equipment, maintain the sledding hill and even provide emergency assistance.

A location close to Sisters, possibly on the Three Creeks Road, would work best. This use might be in conjunction with a nordic center or groomed trail area.

#### Store at Lake Billy Chinook:

To provide service to campers at Monty and Perry South Campground and users on Lake Billy Chinook, the Forest Plan mentions this possible use. The store would provide basics, food, camping equipment, ice, firewood, fishing equipment, and possibly boat rentals.

The campground concessionaire operating in the Perry South Campground would be the logical business to provide this service.

### **Bicycle Guide Service on the Scenic Byway:**

This service would provide guided bicycle tours along the Santiam/McKenzie Scenic Byway. The tours could be 2-5 days long, depending upon stops and side trips along the way. Emphasis would be on interpretation, and information, and the guide would provide equipment and food. Overnight stays could be at resorts or camping.

Existing ecotour and/or mountain biking guides could provide this service.

### **Historical Tours :**

These tours would be of historical and prehistorical sites on the Ranger District and could include interpretation, protection, study, rehabilitation and even reenactment. A professional archaeologist or historian would be the guide and visitors would learn more about the history of the area.

This service could work cooperatively with Forest Service archaeologists in gathering information on historic and prehistoric sites.

Reenactments would involve learning primitive or historical skills and could be in conjunction with the above activities.

### **Volunteer Groups:**

This service would differ from the existing Forest Service volunteers in that a paid volunteer leader would conduct the trip and provide the volunteer labor to meet Forest Service needs. The groups could work on trail maintenance, interpretive trail construction, structure repair, resource surveys and other needs. The volunteers would pay the leader to participate, and the service would provide the projects, food, travel and include other items like equipment and instruction.

Care would need to be taken in not taking away business from existing outfitter-guides, or making this an opportunity for a new guide to get wilderness use.

### **Motorized Tours:**

Even though most forest visitors have their own vehicle and can travel on their own, there may be some opportunities for specialized motorized tours as described below:

#### **OHV Tours:**

Off-Highway-Vehicles, such as 4 wheelers, and jeeps could provide an opportunity for visitors to go off the main roads to watch wildlife, learn more about the forest, and management of the National Forest. The guide could also include safe travel, leave-no-trace and responsible OHV use.

The use would be restricted by conflicts with other users and resources, especially wildlife. Routes and seasons would have to be planned out.

#### Van Tours:

Van tours would provide a interpretive tour of the forest for those who prefer or can't get around by foot or otherwise. Opportunities would be somewhat limited since most people use their own vehicle.

The existing ecotour guide could provide this service.

#### Water Based Uses:

The Sisters Ranger District has several lakes that could provide an area for interpretive tours. Lake Billy Chinook and Suttle Lake are the largest lakes. Opportunities exist at both lakes for eagle watching, as well as nature study. Boats could originate out of existing resorts or campgrounds by existing permittees.

#### Uses With No Opportunities:

##### Hunting:

No hunting guides exist on the Sisters Ranger District. A temporary incidental use permit was issued in 1998 for 3 days. There has been very little interest in this use. The horse packing guide does offer dropcamp service for hunters going into the wilderness.

The reason for the lack of demand is not known. It may be due to the large number of hunting guides to the east, in the Ochocos and Wallawas, where there are more big game such as elk, mule deer, bear, big horn sheep, and antelope.

This use could be subject to change, especially, if demand due to a stocking of animals by ODFW occurred. One example might be if big horn sheep were introduced in the north end of the Sisters Ranger District near Lake Billy Chinook.

##### Downhill Skiing, including helicopter and snowcat skiing:

Two popular ski areas already exist on adjacent Ranger Districts, Mt. Bachelor on Bend RD and Hoodoo Ski Area on McKenzie RD. These would meet the demand for downhill skiing in a resort setting.

Almost all of the high country around the Sisters Ranger District, that would be dependable for snow is located in wilderness. This would restrict helicopter or snowcat skiing.

##### Other Uses Already Provided:

The list of existing commercial services (starting on page 5), lists all the uses already provided. Many of these are historic uses that may need reevaluation in the next Forest Planning process. Wilderness use and the number of institutional outfitter-guides may be at a high level that needs reevaluation.

If there is a demonstrated public demand, the existing commercial services can expand some of their uses, outside of the wilderness. These existing operations may be able to provide many of the services identified in this document.

**How to Use this Needs Analysis:**

This document identifies some opportunities that the District may have for future commercial recreation uses. The process to issue a special use permit for this use would still involve several steps. If an existing permittee wasn't able to provide the new service and there was competitive interest in a new proposal, a prospectus process would be required. Environmental analysis of the new use would also be required. In some situations, the District may not have the time or funding to conduct this process in a timely manner as needed by the prospective permittee.

**Conclusions:**

It should be noted that, it is difficult, if not impossible to identify all the potential uses that could exist and meet the demonstrated public need. This document should change over time to reflect changing public and management need; new policies and direction; and new land management plans.