



ROCKY MOUNTAIN REGION

MINIMUM REQUIREMENT DECISION GUIDE FOR GROUP SIZE LIMITS IN WILDERNESS

“... has outstanding opportunities for solitude or a primitive and unconfined type of recreation.”
Wilderness Act of 1964, P.L. 88-577, Section 2(c)2

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Instructions and worksheets for determining group size limits in wilderness using the Minimum Requirement Decision Guide

Introduction

Nearly 106 million acres of Federal land are managed as wilderness, a Congressional mandate that began with the passage of the Wilderness Act of 1964. In partnership with the public, wilderness managers have a responsibility to preserve and protect wilderness values.

Simply designating a wilderness does not assure its preservation. Careful management is needed to minimize the impacts from human activities in wilderness, including recreation. Recreation use can have the potential to negatively impact the values that we are charged with protecting, if left unchecked.

This Minimum Requirement Decision Guide (MRDG) is provided to assist wilderness managers in making appropriate decisions about their administrative actions in wilderness related to group size limits and requests for exceptions for large groups. This guidance comes from the Wilderness Act of 1964 (P.L. 88-577), Forest Service policies, the Rocky Mountain Region Philosophy pamphlet and the instructional materials provide by the interagency Arthur Carhart National Wilderness Training Center.

In working through the MRDG, it is important to keep in mind that the wilderness resource is fragile and thus any exception should be carefully studied as to the impact on the resource.



Recreation Use in Wilderness

In order to assure a degree of solitude, a group size limit of 25 people and/or stock was established for all Rocky Mountain Region (R2) wildernesses in the early 1980s. The history of how this limit became the Regional Desk Guide group size limit is provided in Appendix A. The combined 25 people and/or stock limit became known as the “25 heartbeats” to clarify that the limit of 25 was for the combined total of people and stock in one group.

A 25-combined group size limit is more restrictive than on other National Forest lands. On other National Forest lands, an unlimited group size is allowed unless it is an organized group larger than 75 people. Organized groups larger than 75 people must have a special use permit.

As mentioned, beginning in the early 1980’s, all R2 Forest Plans established the group size limit in wilderness at 25 people and/or stock as a required standard. In several Forest Plan Revisions, the wilderness group limit for people, without using pack stock, was reduced to a group size limit of 10 or 15 people (hikers and/or backpackers).

Legislative Mandate

The Wilderness Act of 1964 indirectly addresses the issue of group size in the context of recreational use in wilderness. The Act makes a clear distinction between wilderness and other settings. Wilderness is an area (1) featuring natural conditions, and (2) offering the visitor outstanding opportunities for solitude in pursuit of a primitive and unconfined type of recreation.

In Section 2(a) the Act establishes the wilderness system to “...assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural conditions.”



Also in Section 2(a) the Act states that wilderness areas, “...shall be administered for the use and enjoyment of the American people in such a manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character.”

Section 2(c) states, “A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain.”

Also in Section 2(c) wilderness is further defined as “undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which...(2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation.

In the above language, Congress acknowledged that even recreation use in wilderness needs safeguards to assure future generations can enjoy wilderness unimpaired. However, there might be times when exceptions to recreation use limits may be needed for (1) administration of the area and (2) for appropriate recreation use by the general public. Exceptions to regulations, special orders, and internal Forest Service needs should be carefully considered using a systematic process that leads to consistent decisions over time.

It is clear that wilderness managers should not view the language in Section 2(c) as a blanket acceptance of all recreation activities without an analysis to determine if (1) the activity is necessary to meet or compatible with the management requirements for the administration of the area, and (2) where there are safe and acceptable alternatives among management decisions, wilderness values shall prevail over other considerations (FSM 2320.3(1).

Forest Service employees entrusted with management of wilderness should set the highest standard possible when making decisions to allow the use and enjoyment of wilderness. Wilderness is intended to be managed differently from other public lands and this difference needs to be demonstrated to the public through our actions and decisions.

From Legislative Mandate to Forest Service Policy

The following Forest Service Manual (FSM) direction tiers to the issue of solitude and recreation use and group size limits for wilderness:



FSM 2320.6 – Wilderness Model – 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.

FSM 2322.02 –2 – Objectives – Ensure that other resources and activities within each wilderness are coordinated and in harmony with the wilderness resource.

FSM 2323.1 – Management of Recreation – 2323.11 Objectives – (2) Provide outstanding opportunities for solitude or a primitive and unconfined type of recreation.

FSM 2323.12 Policy – (3) Manage for recreation activities that are dependent on the wilderness environment so that a minimum of adaptations within wilderness are necessary to accommodate recreation.

FSM 2323.14 Visitor Management – Plan and manage public use of wilderness in such a manner that preserves the wilderness character of the area.

FSM 2323.04(d) – Forest Supervisor is responsible for approving (3) limiting the number of visitors, parties, party size, or duration of visitor stays in a specific area when the wilderness resource is threatened or damaged because of use by an excessive number of people.

Rocky Mountain Region’s Wilderness Philosophy Pamphlet

Published: September 1989

In 1989, a broad coalition of wilderness stakeholders joined together to address the growing issues and concerns related to the complexity of managing wilderness in the Rocky Mountain Region. The outgrowth of that collaborative effort was a publication, signed and endorsed by the Regional Forester that, while not law or agency policy, articulated the philosophy of managing wilderness based on the law, policies and regulations and years of on-the-ground wilderness expertise. The following excerpts from the Wilderness Philosophy pamphlet address recreational use and group size limits.



Page 2 – There is pressure for greater emphasis on recreation management to accommodate increasing recreation use. Traditionally, the Forest Service has not limited recreation use in wilderness, nor has it always considered the consequences of dispersing recreation use into less-used areas of the wilderness.

Page 5 – Wilderness uses range from:

- (1) **wilderness-dependent uses** (e.g. some spectacular long distance trekking or boating and primitive camping opportunities in areas of remarkable solitude; scientific observation; vicarious participation; some fishing and hunting in pristine environments; and spiritual rejuvenation) to
- (2) **wilderness-associated uses** (e.g. short hiking, picnicking, and camping opportunities; fishing; hunting; and observation of nature and scenery) to
- (3) **wilderness-independent uses** (e.g. mining, grazing of livestock, competitive events, and fishing for stocked fish.)

Page 6 – Whenever one or more uses conflict, activities (or projects) that depend the most on wilderness conditions, should be favored. Favoring wilderness-dependent activities might call for reducing or discouraging – rather than eliminating – certain forms of some activities.

Page 7 – Visitor freedom, unconfined by, protected, or convenience with facilities, rigid controls, or excessive numbers of competing visitors is an important part of the experience.

How to Use This Guide

This guide has been developed to help provide consistency to the way recreational activities and group size exceptions in wilderness are evaluated and to assure that we constantly strive to maintain or improve wilderness character through the decisions that are made. The information in this guide needs to be accompanied by a clear understanding of wilderness values and the ability to translate that understanding to a variety of complex and/or difficult projects in wilderness.

This guide is not a NEPA document, decision document or policy, but rather a series of self-explanatory worksheets designed to assist in thinking through and/or documenting your analysis and decisions. The worksheets include a three step minimum requirements analysis: first, to determine if the activity proposed minimizes any and all impacts to the area for the purpose of the Act, and second, to determine what group size exception, if any, is warranted and third, to determine denial or approval of the request and the extent of



mitigation, if any. The worksheets lead the wilderness manager through a series of questions to provoke thought and understanding about the necessity of the exception requested and the most appropriate decision to allow or deny the request.

The minimum requirements analysis is provided to stretch our imaginations for the least impact method for administering the wilderness. The wilderness manager may authorize any of the generally prohibited activities or uses listed in Section 4(c) of the Wilderness Act if they are determined to be the minimum necessary to do the job and meet wilderness management objectives.

When deciding what activities and exceptions to group size are allowed or denied, follow these steps:

1. Complete a minimum requirement analysis, Step 1 of the worksheets, for all requested activities and exceptions. This Step should not be used to justify use of large groups, but rather, to scrutinize the activity and make the best decision for wilderness in the long term.
2. Complete a “minimum tool” analysis for the exception(s). This analysis can follow the attached worksheet or, if not, should at least address the same points. If the analysis shows a justifiable need to approve the request, it is important to have this analysis in writing to provide to the official(s) who can authorize the exception in wilderness. For some units, this analysis may become an integral part of an environmental analysis required to document a decision.
3. Step 3 is to deny or approve the request and to determine the extent of mitigation necessary.

STEP 1: Analysis of the Activity

The following questions assist in analyzing whether the activity should be or needs to be permitted or allowed in wilderness. Please circle **Yes** or **No**, and explain your reasoning:



Step 1 – Briefly describe the requested activity and the issue/problem.

Question	Yes or No	Explain, Next Step
1. What is the proposed activity, event, or action?	N/A	Describe proposed activity, event, or action that may require an exception to the group size and proceed to Question 2. Do not include proposed management decisions or possible mitigation at this time.
2. Is the activity permissible by law?	Yes or No	Explain Yes or No answer and proceed to Question 3. Include references from other legislation, policy, and analysis and how this issue is addressed in those documents.
3. Does the proposal involve existing rights such as valid mining claim, a private in-holding or state land?	Yes or No	Explain Yes or No answer here and proceed to Question 4
4. Is there a special provision in legislation that allows this activity and associated group size? (Wilderness Act of 1964 or subsequent legislation)	Yes or No	Explain Yes or No answer here and proceed to Question 5.
5. Is the proposed activity or event wilderness dependent?	Yes or No	Explain Yes or No answer here and proceed to STEP 2. Favor wilderness-dependent uses. Prior to issuing a decision, work with the requestor to reduce or discourage the use rather than simply denying the proposed activity or event.



STEP 2:

Analysis of the Request for Exception

Step 2 will assist you in determining the appropriate wilderness management/group size decision. Please circle **Yes** or **No**, and explain your reasoning.

Question	Yes or No	Next Step
1. Is the proposed use an activity that was established prior to the Wilderness Act of 1964?	Yes or No	<p>Explain Yes or No here and proceed to Question 2.</p> <p>If activity predated passage of the Wilderness Act and effects are temporary and short term (less than one day), exemption of group size limits and continuation of use may be a compelling reason to allow request.</p> <p>If use was not prior established, consider alternative areas outside of wilderness to conduct the activity.</p>
2. Are there compelling safety reasons to grant the request to exceed group size limits?	Yes or No	<p>Overriding safety concerns may be a compelling reason to allow the request to exceed group size limits.</p> <p>Explain Yes or No answer here and proceed to Question 3.</p>
3. Does the request assure solitude or primitive and unconfined recreation?	Yes or No	<p>Explain Yes or No answer here and proceed to Question 4.</p> <p>To reduce impacts to solitude associated with large groups consider week-day versus weekend trips. If use cannot be day-adjusted, consider reducing use, or find alternatives areas outside of wilderness to safeguard the solitude of other visitors.</p>
4. Does the request conflict with the protection of wilderness conditions?	Yes or No	<p>Explain Yes or No answer here and proceed to Question 5.</p> <p>Identify ways to mitigate resource impacts to wilderness conditions.</p>
5. Is the group size request primarily based on reasons of economy, convenience,	Yes or No	<p>Explain Yes or No answer here and proceed to Step 3.</p> <p>Economy, convenience, commercial value and comfort are not valid reasons for exceptions. Consider reducing use or finding alternative areas outside of wilderness.</p>



Question	Yes or No	Next Step
commercial value or comfort of the requestor?		

**STEP 3:
Exemption Request - Denial/Approval and Mitigation**

Step 3 is designed to assist wilderness managers in determining the denial of a request for exception to the group size limit or the approval of a request for exception to the group size limit, with mitigation.

If the activity (Step 1) involved a valid right or special provision, then:

1. The proposal involves an activity that is a legal and appropriate use in wilderness. Allow the activity to occur as defined by Forest Plan standards for existing group size limit and Forest Special Order.

If the request (Step 2) is rare and unique, with a compelling justification for an exception and it assures long-term solitude or primitive and unconfined recreation for all users, and the request is wilderness-dependent and not for reasons of economy, convenience, commercial value or comfort, then:

1. The request for exception to the group size limit may be granted. Mitigation may be needed and should be addressed. For example, overnight camping in wilderness should be denied. Document the approved request with a signed Forest Supervisor's cover letter and stipulate the rationale for the exception and mitigation. Include maps documenting the location of the requestor's wilderness trip and establish monitoring if appropriate to assure that physical impacts are minimized.

If the activity and the large group request analyzed in Steps 1 and 2 cannot pass the screening, the request should be denied unless all of the following mitigation is implemented:

1. The requested activity and group size limit will be issued a special use permit; and
2. The overall group size can be split into smaller groups that comply with the Forest Plan group size standard, and



3. Each group is separated as defined by existing Forest special order or as defined in the special use permit; and
4. Conflicts with other users will be reduced or eliminated by day-of-week and/or spatial considerations.

Document the approved request with a signed Forest Supervisor's cover letter and stipulate the rationale for the exception and mitigation. Include maps documenting the location of the requestor's wilderness trip and establish monitoring if appropriate to assure that permit conditions are in compliance and physical impacts are minimized and restored. Define separation of groups, if not already defined in Forest Plan Standards and Guides or by Special Order (see definition below).

Splitting Groups into Smaller Size: The following definition will be used to determine how far apart a group must be in order to meet the requirement stated above, if the definition is not already provided in the Forest Plan Standards and Guides or in a Special Order:

Groups must be totally separated from the rest of the other group with no connection to the other group or individual(s) from the other group at any time during the wilderness trip. When in the wilderness, groups must be out-of-sight and sound of the other group at all times, or by ½- mile separation, whichever is greater. Groups must not come together for any length of time while in the wilderness. If sight and sound or ½- mile separation is not practicable due to topography or logistics, consider separation of groups by drainage or watershed with no groups sharing the same drainage in the same wilderness during the requested time.



Appendix A

History of R2 wilderness group size limit:

The need to establish a region-wide group size limit grew out of complaint letters received from the general public and wilderness users in the late 1970's. At that time, large groups of boy scouts and church groups were visiting the Indian Peaks and Rawah Wildernesses, sometimes arriving by the bus loads with 80 or more kids. Additionally, complaint letters about large groups were received for the Maroon Bells-Snowmass and Weminuche Wildernesses. Regional Forester Craig Rupp called a meeting with Forest staff to discuss the issue. During this same time period, Dr. Glenn Hass, a professor of Recreation Resources at Colorado State University, was conducting research in several Colorado wildernesses. He asked visitors what they felt would be an appropriate group size limit. His findings indicated that most users felt a group size of eight to 10 people was appropriate for wilderness. Mr. Rupp used this research to set a group size limit of 10 people, thus accommodating eight people and two leaders per group for a total of 10 people. Soon thereafter, Outfitter & Guides asked Mr. Rupp to clarify what the group size limit would be for stock users. At that time, the accepted formula (ratio) for people to pack stock was 1 and ½ horses needed for each rider. Therefore, 10 riders would be eight clients and two guides with a maximum of 15 riding horses or pack stock, combined (i.e. 25 heartbeats).

Appendix B

Definitions

Heartbeats: The term “heartbeats” come from the combined total of people and stock making up a total number of “25 heartbeats.”

Group size: What constitutes a group is at the discretion of the Forest Supervisor as specified in the Forest Plan Standard & Guides or in the Special Order. A group is defined as an organized or loosely formed group



of individuals taking a wilderness trip whereby the group usually, but not always, begins and ends the trip as one collected party.

Party size: See group size.

Wilderness values: The recognized reasons for wilderness to exist and be preserved. Wilderness has natural values that are vital to the health of our planet as well as the enjoyment of those visiting them. Wilderness values include things such as watersheds for cities, benchmark for scientific research, critical habitat for wildlife, genetic material for plant and animal diversity, undisturbed geological resources, sanctuary from the pressures and pace of modern society, and a repository for cultural resources. The public purposes of wilderness include, but are not limited to, opportunities for scientific study, education, solitude, physical and mental challenge and stimulation, inspiration, and primitive recreation experiences.

Wilderness-dependent activity: Activities conducted in wilderness which depend on a primeval setting. Whenever one or more uses conflict or compete for access, the principle of wilderness dependency, which calls for favoring activities most dependent on wilderness conditions, is used to guide visitor management toward preserving overuse. For example, some types of scientific study are dependent on the availability of a substantially unaltered ecosystem, perhaps covering a large area, and such conditions may only be found in wilderness (Hendee and Dawson, Third Edition, 2002).

Appendix C

Research

Brown, Perry J.; Haas, Glenn E. 1980. Wilderness recreation experience: the Rawah case. *Journal of Leisure Research*. 12(3): 229-241 p.



Cole, David N., Peterson, Margaret E., Lucas, Robert C., 1987. Managing Wilderness Recreation Use: Common Problems and Potential Solutions. General Technical Report. INT-230, Ogden, UT: US Department of Agriculture, Forest Service, Intermountain Research Station: 60 p.

Cole, David N.; Watson, Alan E.; Hall, Troy E.; Spildie, David R. 1997. High-use destinations in wilderness: social and biophysical impacts, visitor responses, and management options. Res. Pap. INT-RP-496, Ogden, UT: U.S. Department of Agriculture, Forest Service, Intermountain Research Station: 30 p.

Dawson, Chad P.; Watson, Alan E. 2000. Measures of wilderness trip satisfaction and user perceptions of crowding. In: Cole, David N.; McCool, Stephen F.; Borrie, William T.; O'Loughlin, Jennifer, comps. Wilderness science in a time of change conference- Volume 4: wilderness visitors, experiences, and visitor management; 1999 May 23-27; Missoula, MT. Proc. RMRS-P-15-VOL-4. Ogden, UT; U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station: 93-98 p.

Haas, Glenn E. 1979. User preferences for recreation experiences opportunities and physical resource attributes in three Colorado Wilderness Areas. Fort Collins: Colorado State University, Department of Recreation Resources. 141 p. Dissertation.

Haas, Glenn E.; Arnold, J. Ross; Brown, Perry J.; Driver, B.J. 1982. Final report of the research results for the cooperative management-research demonstration project focusing on the Maroon Bells-Snowmass Wilderness in Colorado. Unpublished paper on file at: U.S. Department of Agriculture, Forest Service, Rocky Mountain Forest and Range Experiment Station, Fort Collins, CO. 93 p.

Hendee, John C., and Dawson, Chad P.; 2002. Wilderness management: stewardship and protection of resources and values. Third edition: Fulcrum Publishing, ISBN 1-55591-855-7, 640 p.



Papenfuse, Meghan A.; Roggenbuck, Joseph W.; Hall, Troy E. 2000. The rise of the day visitor in wilderness: should managers be concerned? In: Cole, David N.; McCool, Stephen F.; Borrie, William T.; O'Loughlin, Jennifer, comp. Wilderness science in a time of change conference- Volume 4: wilderness visitors, experiences, and visitor management; 1999 May 23-27; Missoula, MT. Proc. RMRS-P-15-VOL-4. Ogden, UT; U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station: 149-154 p.



Appendix D

Region 2 Wildernesses

Wilderness Group Size Regulations

Updated: 9/04

Wilderness	Forest	Group Size
Absaroka-Beartooth	SNF/R1	15 people and 15 combined pack/stock
Black Elk	BHNF	Combination of 25 persons and saddle/pack
Buffalo Peaks	PSICC NF	Max. people/group is 15. Groups with stock limited to a combination of 25, 15 people max.
Byers Peak	ARNF	Combination of 12 people and/or livestock.
Cache La Poudre	ARNF	Max. people/group is 15. Groups with stock limited to a combination of 25, 15 people max.
Cloud Peak	BNF	Max. people/group is 10, and/or 15 stock. Additional 2 people allowed if a person is trained in Leave No Trace and has certification with them. Larger groups must split into authorized size and camp ½ mile apart even at campsites.
Collegiate Peaks	PSICC NF	Max. people/group is 15. Groups with stock limited to a combination of 25, 15 people max.
Comanche Peak	ARNF	Max. people/group is 15. Groups with stock limited to a combination of 25, 15 people max.
Eagles Nest	WRNF	Max. people/group is 15. Groups with stock limited to a combination of 25, 15 people max.
Encampment River	MB-Routt	Max. people/group is 15. Groups with stock limited to a combination of 25, 15 people max.
Fitzpatrick	SNF	Limited to 20 people and 30 combined pack and saddle stock.
Flat Tops	WRNF	Max. number of people/group is 15. Groups with stock limited to a combination of 25, 15 people max.
Fossil Ridge	GMUG	Combination of 25 persons and pack animals.
Greenhorn Mountain	PSICC NF	Limited to 25 pack/saddle animals with no more than 15 people max/group.
Holy Cross	WRNF	Max. number of people/group is 15. Groups with stock limited to a combination of 25,



Wilderness	Forest	Group Size
		15 people max.
Hunter-Fryingpan	WRNF	Combination of 25 persons and pack animals.
Huston Park	MB-Routt	Max. number of people/group is 15. Groups with stock limited to a combination of 25, 15 people max.
Indian Peaks	ARNF	Limited to 12 people or a combined people/pack stock total of 12.
James Peak	ARNF	Draft Special Orders
La Garita	GMUG NF	Max. combination of people and stock of 25.
Lizard Head	GMUG NF	Group size limited to combination of 25 persons and saddle/pack animals. Groups of 25 or more persons must contact the Norwood District two weeks prior to excursion.
Lost Creek	PSICC NF	Max. limit of 15 persons and/or 10 saddle/pack animals.
M. Bells-Snowmass	WRNF	Max. limit of 10 people and/or 15 stock animals.
Mount Evans	ARNF	Group limit of 15 people and/or 10 saddle/pack animals
Mount Massive	PSICC NF	Max. people of 15. Groups with pack stock limited to a combination of 24, 15 people max.
Mount Sneffels	GMUG NF	Limited to a combination of 25 people and livestock with max. people of 15 in any group.
Mount Zirkel	MB-Routt	Limited to a combination of 25 people and livestock with max. people of 15 in any group.
Neota	ARNF	People and/or stock are limited to a combination of 12.
Never Summer	ARNF	Limited to 15 people and livestock with max. number of 10 people in any group.
North Absaroka	SNF	Limited to 20 people and 30 combined pack and saddle stock.
Platte River	MB-Routt	Max. people of 15. Groups with pack stock limited to a combination of 25, 15 people max. Exception is 25 people/group to float the North Platte River Wilderness Corridor.
Popo Agie	SNF	Limit is 20 people and 30 combined pack and saddle stock.
Powderhorn	PSICC NF	Limited to combination of 25 people/stock.
Ptarmigan Peak	WRNF	Limited to combination of 25 people and livestock, with max. number of 15 people in any group.



Wilderness	Forest	Group Size
Raggeds	GMUG NF	Limited to a combination of 25 persons and saddle/pack animals.
Rawah	ARNF	Limited to combination of 25 people and livestock, with max. number of 15 people in any group.
Sangre de Cristo	PSICC NF	Limited to a combination of 25 people and livestock with max. number of 15 people in any group.
Sarvis Creek	MB-Routt	Limited to a combination of 25 people and livestock with max. number of 15 people in any group.
Savage Run	MB-Routt	Limited to a combination of 25 people and livestock with max. number of 15 people in any group.
Soldier Creek	Nebr. NF	Combination of 25 persons and/or saddle/pack animals.
South San Juan	SJNF	Limited to a combination of 25 people and livestock with max. number of 15 people in any group.
Spanish Peaks	PSICC NF	Limited to 25 pack/saddle animals, with no more than 15 people in any one party.
Uncompahgre	GMUG NF	Having a total of more than 25 persons and/or pack saddle animals in one party (total of 25 persons, pack and saddle animals in any combination) is prohibited.
Vasquez Peak	ARNF	Limited to a combination of 12 people and/or livestock.
Washakie	SNF	Limited to 20 people and 30 combined pack and saddle stock.
Weminuche	SJNF	Limited to a combination of 25 people and livestock with max. number of 15 people in any group.
West Elk	GMUG NF	Group limited to a total combination of 25 persons and saddle/pack animals.