

*Friends of the Wild Swan
PO Box 103
Bigfork, MT 59911*

January 31, 2024

District Ranger, Michael Munoz
Rocky Mountain Ranger District
1102 Main Avenue NW
Choteau, MT 59422

Electronically submitted to: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=65359>

Mr. Munoz and District Rangers,

Please accept the following comments on the Bob Marshall Wilderness Complex Outfitter and Guide Permit Reauthorization. We incorporate by reference the comments submitted by Swan View Coalition and Wilderness Watch.

We appreciate the comment deadline being extended and the revised scoping notice including the permit holders as well as additional information; however, there still lacks sufficient information for the public to provide the site-specific comments the Forest Service requested.

The Forest Service must make the following information available for public review on its website and must also extend the public comment period for another 45 days after information is published on the website:

- permitted service days versus actual use for each permit,
- annual inspections, performance evaluations, or public complaints related to each campsite or operator,
- any NEPA documents and related decisions dealing with outfitting service levels or allocation in the Bob Marshall Wilderness Complex,
- the Bob Marshall Wilderness Complex Character Narrative,
- 2017 needs assessment and extent necessary documentation,
- Campsite Management Plans for each outfitter camp.

The Forest Service's responsibility is to preserve the wilderness character of the Bob Marshall Wilderness Complex, not to promote any particular use, such as outfitting/guiding. Given the many impacts outfitting has on the Wilderness, the Forest Service must not use a Categorical Exclusion (CE) to renew any outfitter permits. An Environmental Impact Statement with accompanying public input is called for to properly protect the wilderness values.

We have met with the Flathead National Forest and Region 1 staff to discuss our concerns with the Special Use Permitting process that includes outfitters and guides. These SUPs are being issued using a Categorical Exclusion that does not analyze the impacts of the activities being approved nor does it look at cumulative impacts of these recreation permits. An Environmental Impact Statement is necessary to analyze the cumulative impacts to wildlife, fish and water quality; place limits on the amount of use; and quantify how many permits may be issued, for what, and where. These SUPs are in lynx, grizzly bear, wolverine, mountain lion, wolf and other wildlife habitat yet nowhere is there an analysis of the cumulative impacts.

Please keep us informed when the requested documentation is posted on the website.

/s/Arlene Montgomery
Program Director