

Comments on: Bob Marshall Wilderness Complex Outfitter Guide Permit Reauthorization

Submitted online at <https://www.fs.usda.gov/project/hlcnf/?project=65359>

Ranger Munoz,

This is my second comment on the Bob Marshall Wilderness Complex Outfitter and Guide Permit Reauthorization. In my first comment, I asked for more specific information about the permittees. "... what permits are up for renewal, what they include, what activities will be conducted, and what violations or complaints have been generated for the life of the permits?" I also asked for a full Environmental Impact Statement (EIS) that considers the cumulative affects of the increase in Special Use Permits (SUP) in recent years all approved with Categorical Exclusions (CE) which require no cumulative effects analysis. The cumulative effects are adding up and must be analyzed before using CEs to fast-track or renew any more SUPs.

The local population around the Bob Marshall is exploding and tourism is constantly increasing. An EIS should be required to analyze the 62 proposed renewals and the cumulative effects of the huge increase in SUPs in the past 10 years on the Flathead National Forest, local private use, and increasing tourism.

Thank you for the list of outfitters who use these permits and the locations of their semi-permanent camps. The locations, however, do the public little good, since they cannot access these areas before the comment period ends. Revised scoping does not provide monitoring reports, violations, and public complaints associated with these permits. In a recent, [Flathead Beacon article](#) Ranger Munoz states that forest personnel cannot check on every permittee every year. If that is the case, then the permits cannot be reauthorized. If there is no ability to monitor the permits, then there are too many permits.

The public must be informed of all monitoring, any public complaints, any violations, any warnings for violations, and any other information pertaining to the improper use of these permits. Without this information, the public cannot create meaningful comment.

Most egregious is that the permittee with multiple violations mentioned in the recent [Flathead Beacon article](#) is included in this list. An [article in the Daily Interlake](#) explains how a District Ranger was overruled when he tried to revoke a permit for multiple violations, "Snelson canceled the outfitter's permit after what he claimed were multiple violations. "If you can't follow the contract, you can't be operating" in the wilderness, Snelson said. But Steele, he claimed, trumped him, and reinstated the outfitter." This permittee, guilty of multiple violations, must not be allowed to hold any permits on National Forests and the permit in question should not be renewed. If political pressure is being applied as the [Flathead article](#) suggests, the public should be informed of the pressure the Forest is experiencing and who is applying this pressure. If well meaning forest personnel are being forced out of their jobs because they attempt to uphold the law, the public should know all the details.

Revised scoping provides no information on how many allowable service days are actually being used and what impact the total service days would have on Wilderness Quality and the unguided public that expect a Wilderness experience. Wilderness limits commercial services to the “extent necessary.” What has the agency determined is “necessary and proper” for realizing the benefits of Wilderness as it pertains to all service days in the Bob Marshall Wilderness Complex including the 62 permits in this proposal? If outfitters have more service days than they are using, then their allocation is more than is necessary and service days must be reduced.

I have run into outfitters in the Wilderness. It is always a shock to hike along a beautiful trail alone and see a big group of pack animals and people. It takes away from the feeling of solitude I hope for in Wilderness. It is also disconcerting to encounter an abandoned camp, well trammled by man. The Forest must preserve Wilderness qualities and a CE will not ensure that these renewals will preserve Wilderness as required by law. I question renewing these permits with inadequate monitoring and ineffectual or non-existent enforcement. SUPs are a privilege granted by the public who own the lands, not an entitlement. There is no reason to renew these permits without full analysis of effects.

Revised scoping does not provide information concerning what pack animals are associated with the permits and their effects on wildlife including disease transmission.

What are the effects of the camps and total user days on the recovery of Wolverine, Lynx, Whitebark Pine, and Grizzly Bears? What are the effects on sensitive species? What are the effects on hunter opportunity?

A recent [poll by Colorado College](#) surveyed voters in eight Western States including Montana and found:

- 67 percent of voters are worried about the future of land, water, and wildlife.
- 78 percent of voters want more emphasis placed on conserving wildlife migration routes, providing highway crossings, and limiting more development to protect wildlife habitats.

[In Montana](#) they found that a majority of voters support nationally protected lands and have concerns about water supplies and the degradation of wildlife habitat:

- 74% support a national goal of conserving 30% of America’s land and waters by the year 2030.
- 81% support the creation of new national parks, national monuments, national wildlife refuges, and tribal protected areas.
- 61% think that the low level of waters in rivers is a serious problem.

What are the effects to Wild and Scenic Rivers and National Trails? I urge you to adhere to the terms and conditions required by special use authorization on public land.

Has there been a carrying capacity analysis? Scoping should provide all NEPA documents concerning outfitters, service levels and allocation in the Bob Marshall

Wilderness Complex. It is up to the Forest to inform the public as to the direct, indirect, and cumulative effects of this proposal on the Wilderness character of the Bob Marshall Wilderness Complex. The public must have the whole story to allow for informed public participation.

The Bob Marshall Wilderness Complex is a rare and precious resource that should not be squandered at the expense of wildlife, Wilderness, Wild and Scenic Rivers, and National Trails.

Thank you for considering my comments.