



Feb. 16, 2024

Michael Munoz
Bob Marshall Wilderness Complex Managers Group Chairperson
U.S. Forest Service, Region 1

RE: Bob Marshall Wilderness Complex Outfitter and Guide Permit Reauthorization comments and need for further, comprehensive Environmental Impact Statement on Special Use Permits

Dear Michael Munoz,

Sierra Club joins hundreds of Montanans with deep concerns about the status of the Special Use Permit (SUP) program for outfitters and guides in the Bob Marshall Wilderness Complex. This is just one use authorized through SUPs that is proving to be a problem for our national forest lands, and the wildlife, waters and other natural resources found on them. This program and the outfitting and guiding that it administers has impacts on our wilderness lands, wildlife habitat and management, and the public's enjoyment of these public resources.

To be clear, Sierra Club is supportive of people getting out and enjoying our public lands and wildlife. It's part of our mission. And for 132 years, we've worked to protect our wildlands and wildlife while encouraging people to enjoy these world-class resources that all Americans share.

That said, clearly there are major problems with this program, how it's being implemented and enforced, and the effects those are having on wildlife and wildlands. This recent article in the Flathead Beacon lays out well those problems,

<https://flatheadbeacon.com/2024/02/15/as-forest-administrators-seek-to-renew-outfitter-permits-in-bob-marshall-wilderness-enforcement-lapses-come-to-light/>

Outfitting on our public lands is a privilege, not a right. That's especially the case in designated wilderness areas, where conservation of the natural resources in a wilderness state in perpetuity is the primary mission. But as many people are experiencing, the large-scale use of these lands by outfitters is impacting those resources negatively. It is, at the very least, worthy of an analysis to look at those impacts, and allow the public to comment.

Sierra Club is not just concerned with outfitting, as the Forest Service is well aware. The large-scale, industrial recreation events involving in some cases hundreds of people in prime wildlife habitat, including grizzly bears and wolverine, is worthy of analysis.

We are requesting that the Forest Service conduct an EIS of how these Special Use Permits are impacting our wild public lands. Thank you for your consideration of this important issue for public lands and the public.

Sincerely,

A handwritten signature in cursive script, appearing to read "Nick Gevock".

Nick Gevock
Field Organizing Strategist, Northern Rockies Wildlands and Wildlife
Sierra Club