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First name: Montana

Last name: School

Organization:

Title:

Comments: The Montana Wilderness School is a 501(c)3 nonprofit outdoor education organization based in Bozeman, Montana, providing multi-week wilderness expeditions for youth. The mission of the Montana Wilderness School is to provide empowering expeditionary wilderness courses to youth that foster personal growth and cultivate a conservation ethic through connecting with remote landscapes and wild places. The greatest barrier for MWS to get students out on public land is acquiring outfitter and guide permits through the National Forest Service. In particular the Custer-Gallatin National Forest, our local forest is the most challenging. It is within this context that I on behalf of the Montana Wilderness School would like to advocate for Alternative C as this the best option to maintain the wild integrity of the forest. With that in mind, MWS would like to see the forest put a special emphasis on the creation of Recreation Emphasis Areas in any alternative chosen. With the creation of those Recreation Emphasis areas, we would like to see in increased opportunity in facilitated recreation through an increased number of Outfitter and Guide Special Use Permits. Furthermore, we would like to see that those Outfitter and Guide Special Use Permits go to uses other than Horse packing to bring some balance to the uses the forest service has chosen to permit. As stated in the Assessment of Recreation Setting, Opportunities and Access published in February of 2017 currently the forest authorizes 32,500 user days for horseback rides but only 6,000 user days for Environmental/Adventure Education. Even if you add up all the other non-extractive (hunting and fishing) human powered permitted uses with the exclusion of rafting you only get 20,275 meaning the lion share of special use permits are going to one type of use. With the creation of Recreation Emphasis Areas facilitated recreation opportunities should be given to outfitters offering human-powered recreation to attempt to achieve some sort of balance in permitted recreation opportunities.

MWS would also like to object to Guideline (FW-GDL-DWA) #05 in the Draft Revised Forest Plan that states: To protect social and ecological conditions, outfitter, and guide service days should not be increased beyond existing authorized use levels within the wilderness.

This guideline should be removed from the final version of the forest plan, as it is a de facto barring of facilitated recreation opportunities for youth. The forest could allow for increased outfitter and guide permits for human-powered, non-mechanized, non-extractive recreation within the wilderness and still maintains the social and ecological conditions within the wilderness. The forest could achieve a balance of permitted recreational uses by allowing an increased number of user days to outfitters providing the underrepresented types of recreation such as Environmental/Adventure Education, Climbing, Mountaineering, etc. If the forest wants to achieve its desired condition (FW-DC-RECOG) number 1 and have a "diversity of recreation" then the forest must prioritize uses other than Horseback Riding. One way to achieve this desired condition would be to allow for an increased outfitter and guide permits for underrepresented recreation types in both wilderness areas and the newly created Recreation Emphasis areas.

Thank you for your time.