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Comments: I am speaking up for the Bob Marshall, Scapegoat, and Great Bear Wildernesses in Northwestern Montana. The U.S. Forest Service is proposing to renew existing outfitter permits in these three Wildernesses, which collectively comprise the Bob Marshall Wilderness Complex, without disclosing which permits, their locations, or any associated information, making it impossible to provide meaningful public input.The Bob Marshall Wilderness Complex has a long history of outfitting and guiding, and many outfitters there have been great supporters of protecting these Wildernesses. But, outfitting and camps have impacts which are often glossed over or overlooked, including Wilderness trails so heavily used by pack animals that they more resemble roads than foot or horse trails, and outfitter campsites in Wilderness that are allowed to have structures like tent frames, corrals, and hitching posts. All of these outfitter impacts are exacerbated by the extraordinarily large people and pack stock party sizes allowed in the Wildernesses.

The Forest Service proposes to renew 62 special use outfitter permits that will be in place for at least a decade, without disclosing the impacts from these commercial operations. The agency's scoping letter lacks important information, such as annual inspections and public complaints, and on top of that, the agency proposes to approve the renewals with a Categorical Exclusion (CE), rather than go through a more rigorous environmental review.

The Bob Marshall Wilderness Complex is one of the crown jewels of our National Wilderness Preservation System and helps protect one of the last great expanses of biodiversity in the world. Its more than 1.5 million acres of Wilderness are some of the best habitat for native wildlife such as grizzly bears, Canada lynx, wolverine, elk, gray wolves, moose, black bears, mountain lions, mountain goats, and bighorn sheep. The Bob Marshall Wilderness (also known as the "Bob") holds the distinction of being one of the original 54 Wilderness areas designated with the passage of the Wilderness Act 60 years ago!

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.

The Bob Marshall Wilderness Complex Outfitter and Guide Permit Reauthorization lacks site-specific information, despite requesting site-specific comments. Accordingly, 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

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 Assessment or Environmental Impact Statement

with accompanying public input is called for to properly protect this fabled Wilderness Complex.

I urge the Forest Service to protect wilderness character in the Bob Marshall Wilderness Complex as it considers outfitter permits.