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First name: Mark

Last name: Olinger

Organization:

Title:

Comments: I am a retired soldier, public policy specialist, strategist, and supporter of America's wilderness. My purpose today is to express my opposition to the Forest Service proposal to renew 62 special use outfitter permits without a rigorous environmental review.

One of the crown jewels of our National Wilderness Preservation System, the storied Bob Marshall Wilderness Complex (Bob Marshall, Scapegoat, and Great Bear Wildernesses in Northwestern Montana) 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 holds the distinction of being one of the original 54 wilderness areas designated with the passage of the Wilderness Act 60 years ago!

The Bob Marshall Wilderness Complex has a long history of outfitting and guiding. While some outfitters there have been great supporters of protecting the wilderness; their 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 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 wilderness.

It is 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 and or guiding.

Now 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.

Given the many impacts outfitting has on the wilderness, the Forest Service must not use a 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.