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Organization:

Title:

Comments: Dear Forest Service,

Your proposal to renew 62 special use existing outfitter permits in the Bob Marshall, Scapegoat, and Great Bear Wildernesses in Northwestern Montana - without disclosing which permits are involved, their locations, or any associated information - make it impossible to provide meaningful public input.

The Bob Marshall Wilderness Complex, which is comprised of these three Wildernesses, 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. It is also one of the original 54 Wilderness areas designated with the passage of the Wilderness Act 60 years ago.

Although the Complex has a long history of permitting outfitters and guides, the fact is that camping and outfitting damage the land, which is often overlooked or glossed over. Wilderness trails are so heavily used by pack animals that they more resemble roads than foot or horse trails, and outfitter campsites in Wilderness 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 now allowed in the Wildernesses.

The 62 permits you want to renew will be in place for at least a decade. Why are you not disclosing the damage that these commercial operations will cause, or including those facts in your decisions to renew? What's lacking in your scoping letter but sorely needed is important information, such as annual inspections and public complaints. Worse, you propose to approve the renewals with a Categorical Exclusion (CE), rather than go through a more rigorous environmental review. Yet 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.

You need to make the following information available for public review on your website and you must also extend the public comment period for another 45 days after that 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 absolutely necessary to properly protect this fabled Wilderness Complex.