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Organization:

Title:

Comments: To the USFS:

Your agency propose to renew existing outfitter permits in the Bob Marshall, Scapegoat, and Great Bear Wildernesses in Northwestern Montana which collectively comprise the Bob Marshall Wilderness Complex. To date your agency has not disclosed which permits, their locations, or any associated information, making it impossible to provide meaningful public input.

The storied 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 Bob Marshall Wilderness Complex has a long history of outfitting and guiding, and many outfitters there have been great supporters of protecting these Wildernesses. However, outfitting and camps have impacts which are often minimized 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.

Now your agency 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. Your agency's scoping letter lacks important information, such as annual inspections and public complaints, and the agency proposes to approve the renewals with a Categorical Exclusion (CE), rather than go through a more rigorous environmental review.

Your agency'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 the public's requesting site-specific comments. Accordingly, USFS 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 significant negative impacts outfitting has on the Wilderness, USFS must not use a Categorical Exclusion (CE) to renew any outfitter permits. An Environmental Assessment or Environmental Impact Statement with accompanying public input is necessary to properly protect this fabled Wilderness Complex.

Thank you for considering my comments.