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First name: Kim Last name: Porter Organization:

Title:

Comments: Thank you for accepting my comments regarding the Bob Marshall Wilderness Complex Outfitter and Guide Permit Reauthorization #65359, covering the Bob Marshall, Scapegoat, and Great Bear Wildernesses in Northwestern Montana. Unfortunately, the proposal to renew existing outfitter permits in these three Wildernesses without disclosing which permits, their locations, or any associated information, make meaningful public input impossible.

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 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 proposal to renew 62 special use outfitter permits that will be in place for at least a decade, should not be allowed to proceed without disclosing the impacts from these commercial operations. Additionally, the agency's scoping letter lacks important information, such as annual inspections and public complaints, as well as a short-sighted proposal to approve the renewals with a Categorical Exclusion rather than go through a more rigorous environmental review. The Forest Service's responsibility is to preserve the wilderness character of the Bob Marshall Wilderness Complex, not to promote any specific use such as outfitting or guiding.

The Forest Service needs to make the following information public on its website and extend the public comment period after the information is appropriately published:

- 1. The number of permitted service days versus actual use for each permit
- 2. The number of annual inspections, performance evaluations, or public complaints for each campsite, guide, or operator
- 3. All NEPA documents and decisions dealing with outfitter or guide service levels or allocation in the Bob Marshall Wilderness Complex
- The Bob Marshall Wilderness Complex Character Narrative
- The 2017 needs assessment and extent necessary documentation
- -- The Management Plans for each outfitter camp

Given the many impacts commercial outfitters and guides are having on the Wilderness and this area, the Forest Service can not use a Categorical Exclusion to renew permits. An Environmental Assessment or Environmental Impact Statement with accompanying public input is necessary in order to make decisions on this Wilderness Area.

Thank you for accepting my comments.