Data Submitted (UTC 11): 1/31/2024 8:02:08 PM
First name: Nancy
Last name: Campbell
Organization:
Title:
Comments: Friends,

I am VERY concerned that, as it stands, your consideration of renewing 62 existing outfitter permits in the Bob Marshall Wilderness Complex (consisting of the Bob Marshall, Scapegoat and Great Bear Wildernesses) is both incomplete and inadequate.

I imagine you are understaffed and under time pressure, but failing to disclose which permits they are, what their locations are, what permitted uses and structures are, etc. is woefully inadequate and misleading. It raises suspicion that the current proposal is calculated to keep the renewals secret.

It certainly puts the lid on public comment, since the public doesn't know what's being considered or how things are working now.

That, friends, is counter to the democratic process - and the legal requirement to get public comment.

The Bob Marshall Wilderness Complex (affectionately known as "Bob") is a crown jewel in America's Wilderness Preservation System. It:
1.protects one of the last great expanses of biodiversity in the world
2.has more than 1.5 million acres of Wilderness that are some of the best habitat for native wildlife (grizzly bears, Canada lynx, wolverine, elk, gray wolves, moose, black bears, mountain lions, mountain goats, bighorn sheep)
3.holds the distinction of being one of the original 54 Wilderness areas designated in the Wilderness Act 60 years ago!

"Bob" has had a long history of outfitting and guiding, and many outfitters have been big supporters of protecting these wildernesses. But outfitting and camps DO have impacts, and those impacts are too often glossed over, overlooked and ignored, such as:
1.such heavy, intense use of Wilderness trails by pack animals that those 'trails' are more like main roads than foot/horse trails
2.outfitter campsites in Wilderness are allowed to have lots of structures tent frames, corrals, hitching posts, etc)
3.extraordinarily large people and pack stock party sizes are allowed.

The permits under consideration will last for over a decade (12 years), which is a very long time to let impacts simply happen because there are existing permits.

Letting this happen WITHOUT DISCLOSING THE IMPACTS means that you're putting commercial business interests above the preservation of the Wilderness itself. Yet your job is to preserve the Wilderness for America, for present and future generations. You are not a lobbyist or advocate for commercial businesses.

Your scoping letter fails to include important information - information like annual inspections and public complaints.

What's more, your proposal approves the renewals with a Categorical Exclusion (CE) - which mean the permits don't have to go through the more rigorous environmental review. In other words, permitters are being given a free pass.

IT IS THE FOREST SERVICE'S RESPONSIBILITY TO:

1.preserve the wilderness character of the "Bob" -- NOT to promote any particular use like outfitting/guiding
2.make COMPLETE information available for public review and comment on your website
3.extend the public comment period for an additional 45 days after you publish the information on your website.
4.provide the following information:

a. permitted service days versus actual use for each permit
b. annual inspections
c. performance evaluations
d. public complaints related to both b. and c. above

5.reveal any NEPA documents and related decisions that have to do with outfitting service levels or allocation in the "Bob"
6. the "Bob" Character Narrative
7. 2017 needs assessment and extent necessary documentation
8.Campsite Management Plans for each outfitter camp

Outfitting has many, and major, impacts on the Wilderness. Those must be mitigated and tightly limited so as not to damage the Wilderness

Therefore the Forest Service MUST NOT USE a Categorical Exclusion (CE) to renew outfitter permits! An Environmental Assessment, or Environmental Impact Statement, with accompanying public input is necessary - even critical - to properly protect this one-of-a-kind Wilderness Complex.

Best,