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Comments: The BMWC Special Use Permits Reauthorization does not qualify for a Categorical Exclusion because extraordinary circumstances exist, because cumulative impacts of reauthorizing this many SUPs have not been analyzed, and because little information is available to the public, especially regarding the past compliance and monitoring of these SUPs. An EA or EIS needs to be done for this reauthorization.

The large increases in both private and commercial use of FNF in the past 10 years is an extraordinary circumstance that precludes a CE. I understand that between 2010 and 2020, SUPs in FNF more than doubled. At the same time, there has been a large increase in private recreational use of the forest. The problem is that all commercial use is detrimental to private use, and these are the public's lands. History shows that whenever overuse occurs, subsequent restrictions unfairly exclude the public and favor commercial permit holders. Floating the Colorado River through Grand Canyon National Park or the Middle Fork of the Salmon River in Idaho are prime examples. Most of their use is allocated to commercial use, and private permits are nearly impossible to get. Even if restrictions to public use do not occur, the public's experience is degraded. For example, competition for untouched snow in the central Wasatch Range, Utah, is fierce, made more so by commercial helicopter skiing, commercial snow cat skiing, guided backcountry ski tours, and commercial avalanche schools. Opportunities for solitude are greatly diminished.

In 2021, I was lucky enough to get a permit to hike the John Muir Trail. Although there were hordes of backpackers, the biggest negative impact came from commercial horse packing trips. When one of these trips came through, sometimes with 30 pack animals, the hikers had to get off the trail and let the long pack string pass. The pack animals would leave the trail a muddy mess (it was raining a lot), and muck up the streams, preventing getting clean water for filtering and drinking. The commercial horse packers were allowed to legally graze their animals in designated wet meadows, while in the same areas, we backpackers were prohibited from even setting a tent up for one night on dry grass. While I don't mind following leave no trace principles, it seemed that the commercial operators were held to a much lower standard, and it came at the expense of the private users and the ecosystem.

I've observed similar behavior closer to home along the NF Blackfoot trail in Lolo National Forest and along some of the Selway-Bitterroot Wilderness trails. Long commercial pack strings go through with similar results to those on the John Muir Trail. Will the future of BMWC be different? I doubt it.

How will reauthorizing the 62 BMWC commercial permits affect wildlife? What are the effects on ESA-listed species like grizzlies and wolverine? Has the USFWS been consulted on this proposal? Have you analyzed the effects of this proposal on all wildlife species?

Since scoping, you added a list of commercial outfitters and their camp locations, but there is no other information. How many of these outfitters are new additions since the last SUP mass reauthorization? It does not appear you have analyzed the cumulative effects of these 62 SUPs-those effects must be significant. Have some violated their SUP regulations? What monitoring has been done for each? Are their camps allowed to exceed a 16-day stay? The public is not allowed to do this for the reason that it adversely affects other human users, wildlife, and plant life.

Over 20 years ago, I spent a week camped at Kelly Lake in the Anaconda-Pintler Wilderness. There was a permanent outfitter camp there, complete with an electric fence enclosing a grazing area that extended along the lake shore. This alpine meadow was overgrazed and full of livestock droppings. I don't know if this violated their permit, but it should have. Even if it did, there was no enforcement by BDNF personnel. How will FNF monitor and enforce the terms of each SUP?

Reauthorizing these commercial permits under a CE will only benefit a few: the commercial operators, the FNF budget, and FNF administrators trying to please the politicians and get a promotion. But it will surely harm wildlife, the ecosystem, and the general public, who are the real owners of this land. This proposal appears to be yet another case of FNF not being open and transparent with the public.