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District Ranger, Michael Munoz
Rocky Mountain Ranger District
1102 Main Avenue NW
Choteau, MT 59422

RE: The reauthorization of existing priority outfitter and guide special use permits in the Bob Marshall Wilderness Complex.

Comments submitted electronically via: https://cara.fs2c.usda.gov/Public//CommentInput?Project=65359

Dear Ranger Munoz,

I am commenting on the re-authorization of priority use special use permits (SUP) for outfitters and guides in the Bob Marshall Wilderness Complex (BMWC).

I see a disturbing trend on the Flathead National Forest (FNF) to ignore the intent and purpose of NEPA (PL 91-190) regarding outfitter and guide permit reauthorization while moving immediately to a categorical exclusion (36 CFR 220.6(d)(11)). The scoping process does not provide sufficient information about each permit. The public needs more information about terms of an operation, number of days allotted, and any complaints or violations of the terms of the permit. The proposed action should include the use of system trails, base and spike camp locations and facilities, and the location of outfitter-created routes routinely used. There should be maps that show camp locations and the extent of the areas used by the permittee. The Special Use Permits (SUP) should require an EIS to analyze the cumulative impacts to wildlife, fish and water quality; place limits on the amount of visitor use; and, quantify how many permits may be issued, for what, and where. These SPUs are in grizzly bear, wolf, wolverine, mountain lion, and lynx habitat but there is no analysis of the effects, both direct and indirect, as well as cumulative impacts. Specific to wolves (and grizzly bears if delisted), the Forest Service should consider the effects of the Montana Department of Fish, Wildlife, & Parks (MDFWP) wolf predator control efforts on Wilderness Character. Predator control in wilderness in inappropriate. The Forest Service should address the potential effects of MDFWP predator control efforts on natural predator-prey relationships in the BMWC.

The proposed action description in the scoping notice is incomplete. The current re-authorization process doesn't adequately assess whether the current existing permits best serve the public interest today and over the course of the next ten years. It reflects the status quo. Reauthorization of existing permits makes it difficult for new permittees that reflect new types of recreational outfitter and guide services, such as minority owned operators, to get established and makes it more difficult to increase access for traditionally underrepresented groups. Also missing from the scoping is the allocation of use on Wild and Scenic Rivers and the effects of approving commercial activities that may substantially degrade Wilderness, Wild and Scenic River, and National Trails qualities and values. The scoping should address the increased summer use along the South Fork of the Flathead River, designated as Wild and Scenic River status.

Reauthorization of existing SUPs fails to adequately assess whether the current allocation of use is appropriate and sustainable considering current resource conditions, public demand, and significant increased levels of non-permitted recreational use of Wilderness that has occurred in recent years. It does not account for the

recreational growth in areas like the Swan Front adjacent to the BMWC where there is an influx of temporary special use permits. There is a need for more comprehensive assessment of the allocation and management of all types of recreational use, including permitted outfitter and guide services. This will ensure recreational use is compatible with other resource values like clean air and water, fish and wildlife habitat, designated Wilderness, and Indigenous cultural practices and treaty rights.

I did not see any mention of the Continental Divide National Scenic Trail (CDNST) and the degraded trail physical conditions along some segments caused by extensive use from supply pack strings.

There is no mention in the Scoping Document of the Forest Service mandate to preserve the wilderness character of the BMWC and the influence of commercial outfitters on these qualities. Wilderness education is now part of the annual performance review criteria for the Forest-level Recreation Managers and District Recreation staff within the BMWC. It is important to hold the District Recreation staff and the Forest-level Recreation Program Managers accountable for making sure that outfitters are providing wilderness interpretation and education, including the wilderness character qualities of untrammeled, natural, undeveloped, solitude or primitive and unconfined recreation, other features or cultural considerations to their clientele. Outfitters should be held to a high standard of implementation and compliance to these wilderness qualities in their main camp and all spike camps.

Many members of the public, including Forest Service retirees, have been calling on the national forests that have management responsibilities for the BMWC as well as adjacent public non-wilderness roadless lands (like the Swan Front) to undertake a landscape-level analysis of recreational use patterns and their impacts on ecological, social, historical and cultural resources. This analysis would ensure consistency across national forest jurisdictions reflecting a forward vision and cross boundary instead o. being reactive to changing demand. It is imperative that there be coordination and cooperation with federal, state, tribal and local recreation management authorities. This will provide a consistent approach to wildland recreation management.

Thank you for providing the opportunity to comment on the reauthorization of Outfitter and Guide permits within the BMWC. The Special Use Permits should require an EIS to adequately assess and analyze all the concerns I have mentioned.

Sincerely,
Kari Gunderson, PhD, Wildland Recreation Management
Swan Valley, Montana