Data Submitted (UTC 11): 2/16/2024 2:33:28 PM
First name: Charlie
Last name: Booher
Organization: Boone and Crockett Club
Title:
Comments: Dear Ranger Munoz:

We appreciate and support your choice to use a categorical exclusion (36 CFR 220.6(d)(11) to reauthorize the 62 existing outfitter and guide permits simultaneously, including the Boone and Crockett Club. This action is merited and the most efficient means for reauthorizing these special use permits. As you know, we continue to seek greater regulatory certainty for the Boone and Crockett Club and the Montana Council of the Boy Scouts of America's "Montana Outdoor High Adventure Base" program in the form of priority use days. This program has operated under temporary use permits that authorize the Boone and Crockett Club to provide livery for highly trained groups of scouts to participate in packrafting trips.

As your reauthorization continues, we respectfully request that you consider some form of permit relief for youth/educational groups. There is a compelling reason to treat educational or youth groups (that provide significant public good) differently than any other commercial user, or the general public: scouts who participate in our program receive substantive training in the principles of Leave No Trace, adjust their schedules to limit conflicts with other users, and are held to a high standard of use when recreating on our public lands. As much or more than commercial outfitters who serve the general public, our program is integral to maintaining and sharing the wilderness character of the area (Bob Marshall Wilderness Complex Character Narrative, R1-21-35). Also, unlike commercial outfitters the fees we charge do not cover the costs of our program. We are non-profits whose goal is to provide experiences that result in the next generation of responsible outdoor enthusiasts.

Further, we also request that if you consider creating a novel category of use for packrafting treks, that you and your colleagues ensure permitted use days for educational and youth groups are provided.

Thank you for the opportunity to provide comments and please do not hesitate to reach out with any questions.