



February 8, 2024

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 Mr. Munoz,

Thank you for the opportunity to comment on the re-authorization of priority use special use permits for outfitters and guides in the Bob Marshall Wilderness Complex (BMWC). Glacier-Two Medicine Alliance offers the following comments on behalf of our more than a thousand members and supporters, many of whom regularly recreate in the BMWC, either personally or with outfitter and guide services. Glacier-Two Medicine Alliance is a community-based conservation organization located in East Glacier Park, MT on the lands of the Blackfeet Nation.

Glacier-Two Medicine Alliance supports permitted outfitter and guide services in the BMWC. Outfitters and guides can provide a valuable public service that enhances access and responsible recreation of our public lands, as well as can instill greater appreciation for their preservation and careful stewardship. However, we do have some concerns about the re-authorization process which we explain further under "additional comments."

Our direct observations and knowledge of outfitters and guides currently operating in the BMWC is mostly limited to the Badger-Two Medicine area and the Middle Fork Flathead River drainage. For these areas, we have no site-specific concerns to offer nor have we observed or heard any specific complaints about the operations of permitted outfitters in these areas.

#### Badger-Two Medicine Observations

Staff and members of Glacier-Two Medicine Alliance have participated in several trips led by Dropstone Outfitting in recent years. Dropstone Outfitting was always extremely diligent in its utilization of best practices, including Leave No Trace Principles, to minimize environmental disturbance by both horses and hikers. Their guides shared these principles with guests and also taught guests how to practice Bear Aware recreation

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behavior. Knowledge about the ecological and cultural heritage of the area was shared, along with a sense of deep respect and reverence for the land, for wildlife, and for its Indigenous peoples.

GTMA staff has observed the assigned camp for Blackfeet Outfitters at Lonesome Creek during the summer months. The site was in excellent condition in every respect. This appeared to be more to limited use, we understand from others in our community that that is to be the case.

GTMA staff has observed the assigned camp for A Lazy H Outfitters on the Two Medicine in the summer when it is not in use. The camp is nicely hidden down away from the main trail. Parts of the camp remain in a permanent fashion yet in a manner consistent with outfitter camps throughout BMWC in the off-season. Flooring and supports for wall tents, as well as corrals and hitching rails all remain erected. The site appears to be in good shape overall, although more attention to spraying thistle is warranted. We appreciate the work A Lazy H does to clear secondary trails, especially in the Woods Creek drainage.

GTMA staff regularly interacts with guides from Northern Rockies Outfitter on day horseback rides in the Badger-Two Medicine. We think they do a fine job of providing guests a quality experience, including firsthand knowledge of the area.

GTMA staff and board members have regularly met with student groups from the University of Montana – Wilderness Institute, and the Wild Rockies Field Institute, including in the backcountry of the Badger-Two Medicine. We are deeply impressed and supportive of both these institutions missions to teach students about the natural environment, natural resource policy and management, environmental ethics, Indigenous cultures, and human-land relations. Students practice Leave No Trace and other best practices for minimizing human impacts on both wild landscapes, and the human communities through which they travel, like East Glacier.

#### Middle Fork Flathead Observations

GTMA staff has encountered Glacier Raft Company trips along the Wilderness stretch of the Middle Fork Flathead on several occasions over the past few summers, as well as stayed in several riverside camps frequented by Glacier Raft Company and Wilderness River Outfitters. Our observations and interactions were entirely positive. The camps were clean and largely contained to hardened areas with minimal trampling of vegetation. A few sites had stone ringed fire pits and log benches that appeared to have been in long-standing use, although these could have been created and maintained by the general public.

GTMA staff has also flown with Red Eagle Aviation into the Schafer Meadows airstrip on several occasions. The pilots were safe, courteous and responsible.

#### Additional Comments

GTMA has strong reservations about using a categorical exclusion (36 CFR 220.6(d)(11) to reauthorize 62 existing outfitter and guide permits simultaneously.

First and foremost, the current decadal re-authorization process does not properly assess whether the suite of existing permits best serve the public interest today and for the next ten years. It

simply affirms the status quo. Thus, the majority of outfitter services in the BMWC are, and likely will continue to be, for backcountry camping, hunting, and fishing trips with horses. These trips tend to be marketed to certain demographics, typically wealthier out-of-state clientele, who are disproportionately older and whiter than the American public. While there is nothing wrong with these services, or with these demographics enjoying Wilderness via outfitters per se, re-authorization of existing permits makes it very difficult for new types of recreational outfitter and guide services, especially minority owned and operated or directed services, to get established. The automatic re-authorization process thus creates a structural barrier to entry for new permittees that has significant ramifications for who gets to recreate or economically benefit from our public lands. This process undermines one of the expressed purposes of allowing outfitter and guide services in Wilderness: to increase access to recreation, and for people to learn about the values and preservation of Wilderness. Simple re-authorization also undermines the Forest Service's many statements and policy directives elsewhere to increase access for traditionally underrepresented groups.

Second, re-authorization of existing priority-use permits does not adequately assess whether the current allocation of use is appropriate and sustainable in light of current resource conditions, public demand, and significant increased levels of non-permitted recreational use of Wilderness that we've seen in recent years. Nor does it account for the growth, at least in some areas of the national forest lands adjacent to the BMWC, of temporary special use permits that have occurred in the past decade. A stronger, comprehensive assessment of the allocation and management of all types of recreational use, including permitted outfitter and guide services, is needed to ensure recreational use is compatible other resource values like clean air and water, fish and wildlife habitat, Wilderness, Indigenous practices and rights, etc.

Finally, we are concerned that insufficient information about each permit was provided to the public. In order to offer the best possible comments, the public needs more information about the terms of the operation, location, number of days, and any complaints or violations of the terms. The initial scoping letter did not even provide the names of the permits up for re-authorization. These public records should have been made available as part of the scoping process.

GTMA strongly encourages all three national forests that manage the BMWC along with the immediately adjacent non-Wilderness lands, to commit to undertake a landscape-scale analysis of recreational use patterns and their impacts on ecological, social, historical and cultural resources. This would analysis should tier off the revised forest plans for the Flathead and Helena-Lewis and Clark, and the forthcoming Lolo forest plan revision. It would be ensure greater consistency across national forest jurisdictions and be forward-looking, and cross-boundary rather than largely re-active to changing demand. A needs assessment for permitted outfitter and guide services, both temporary and permanent should be part of this process. The cooperation and coordination with federal, state, tribal, and local recreation management authorities should be prioritized, as what happens in Glacier affects the BMWC, for example. The end goal would be to develop a forward-looking, recreation management plan to guide recreational use across national forest lands in the Crown of the Continent to ensure resource protection, public enjoyment, and consistency in approach to recreation management.

Thank you again for the opportunity to comment on the re-authorization of outfitter and guide permits in the BMWC. I would be happy to discuss any of these ideas further with you or other appropriate US Forest Service staff.

Sincerely,

A handwritten signature in blue ink that reads "Peter Metcalf". The signature is written in a cursive style with a long horizontal stroke extending from the end of the name.

Peter Metcalf  
Executive Director