



GLACIER-  
TWO MEDICINE  
ALLIANCE



To: Anthony Butterfield, Sean Cranmer, Derrick Mercer, Jeremy Rust, Julie Gerrior, Chris Prew, and Anthony Botello  
US Forest Service  
Flathead National Forest  
650 Wolfpack Way  
Kalispell, MT 59901

Re: 2024 Summer Rec Special Use

*Submitted via electronic mail to:* [comments-northern-flathead@usda.gov](mailto:comments-northern-flathead@usda.gov)

March 25, 2024

Dear Flathead National Forest Staff,

Glacier-Two Medicine Alliance (GTMA) and National Parks Conservation Association (NPCA) appreciate the opportunity to comment on the Flathead National Forest's (Flathead) proposed issuance of 23 temporary special use permits (SUPs) for outfitting and guiding activities or recreation events for summer 2024. GTMA is a community-based, grassroots conservation organization located in East Glacier Park that works to protect and steward the lands, waters, and wildlife of the Badger-Two Medicine and surrounding areas in Montana's Crown of the Continent ecosystem, including portions of the Flathead National Forest. NPCA is a national organization that works to protect and connect national parks to their surrounding landscapes, with a long history of working in and around Glacier National Park and the greater Crown of the Continent ecosystem. Please accept these comments on behalf of our hundreds of members in NW Montana and millions of members and supporters across the country as a part of the official record.

### **General Comments**

First off, we acknowledge and thank the Forest Service for some improvements to this scoping process. The proposed permits were released in March, months ahead of the summer season, unlike in past years when they were released a month or less before the start of the permitted season. The earlier release should provide the Forest Service time to more fully consider public input, as well as provide the entities requesting a permit with a better timeline to plan for the permitted activities, including hiring staff if necessary. We also applaud the start of public comment in the middle (or beginning) of the week, rather than late on a Friday afternoon (often over a holiday period). Thank you for making these positive changes in response to suggestions from various public commentators, including GTMA and NPCA.

One beneficial improvement from last summer was not continued this year: clarification of which permits have been previously issued under 36 CFR 220.6(d)(8) and which are new or

modified requests. For permits that are being re-issued, additional information should be provided on the website about past use, including number of user days and any complaints or non-compliance documented. We would again encourage the Forest Service to improve the content provided about all the permits, including a searchable map showing where all the proposed permitted use is located, along with the recreation opportunity spectrum and desired conditions for the area. Many of the permits this year, for example, request use on trails to Doris Mountain, Doris Lake, or Doris Point Boat Launch. A single, searchable heat map showing all requested permits by types of use and the number of user days would help the public (and probably the Forest Service) assess the potential cumulative effects these permits could have on wildlife, water, soils, other Forest resources, or the non-permitted recreational public. The website should include a list and map of temporary special use permits that have received 5-year authorizations, as well as a list and map of all priority special use permits across the Forest.

To be clear, we support outfitter and guide services as a valuable public service that, when done properly, can improve public access and responsible enjoyment of our National Forests. Responsible outfitters and guides can instill greater appreciation for the preservation and careful stewardship of our public lands. We also think temporary special use permits in particular offer a pathway to serve underrepresented communities and niche or new recreational activities.

However, we continue to harbor strong concerns about the growing number of special use permits being authorized and the lack of comprehensive review and analysis of the cumulative impacts of all types of permitted activities and non-permitted general recreational use on the land, water, wildlife, and other resources of the Forest. The repeated, annual use of categorical exclusions to authorize and re-authorize permits does not provide the hard look required to manage growing recreational use. Thus, we continue to encourage the Forest Service to conduct a comprehensive needs assessment and develop a forward-looking recreation strategy for managing growing recreational use across the entire forest, including both permitted and non-permitted uses. Early and sustained engagement with partners and the general public should be an integral part of this process. Without a current, forward-looking strategy to manage recreational use, unacceptable declines in wildlife habitat and habitat security, degradation of other resources, and social conflicts that could otherwise be avoided or minimized will instead continue.

### **Comments about Specific SUPs**

Except as noted below, we have no specific concerns about any of the proposed permits. We particularly support the issue of SUPs for youth and education-focused activities. SUPs like these can facilitate access to outdoors for youth and underserved groups, as well as provide an important public service for all demographics by furthering knowledge and awareness of treasured yet sensitive public land's natural and cultural values.

#### **1. Flathead Outdoors**

GTMA and NPCA continue to have the same concerns about the repeated issuance of an SUP for guided motorized activities in the Skyland/Challenge area, including by e-bike, e-dirt bike, and standard dirt bike that we have expressed during prior public comment periods on this proposed permit (including in 2020, 2021, 2022, and 2023). As we wrote last year:

“This area is presently a quiet, lightly visited zone that provides dispersed car camping, gravel and single-track bicycling, a rental cabin, and access to trailheads that lead quickly

into designated Wilderness, recommended wilderness, or the tribally-significant Badger-Two Medicine. The potential closure of some of these trail segments to motorized and/or mechanized use is presently being considered by the FNF. Permitting guided motorized recreation is out of sync with the character and present recreational use of this area as well as potentially at odds with the broader, travel management assessment for the FNF.

Another key concern is the sensitive fish and wildlife habitat that may be impacted by the additional motorized recreation. Morrison Creek and Granite Creek, which portions of the open routes follow, are designated critical habitat for bull trout as well as likely important genetic refugia for westslope cutthroat trout.<sup>1</sup> The whole area is critical habitat for Canada Lynx. The slopes immediately above the motorized routes are suitable maternal habitat for wolverines. A high concentration of grizzly bears populate the area. *Besides impacts to water, soils, and soundscapes from the permitted activity, the tours and marketing will draw increased attention and use to this easily accessible, yet lightly visited area, magnifying the impacts on the resources, fish and wildlife, and current public uses of the Skyland and adjacent areas like the Badger-Two Medicine.*” (Emphasis added).

We also remain concerned about the repeated issuance of a special use permit for both winter and summer operating seasons for the same seasonal activities, by the same outfitter, in the same area. The repeated issuance appears to violate the Flathead’s “Process and Guidelines” for issuing temporary special use permits, which state: “Temporary Outfitter and Guide Permits are intended for use that is non-recurring and not intended for building a business.”<sup>2</sup> The use is recurring (this would be the 5<sup>th</sup> straight year). The company intends to use this permit to build a business, as suggested by its request to the Forest Service about receiving a priority-use 10-year permit. We’d appreciate clarification of the number of recurrent issuances of a permit that is allowed before a use is considered “recurring.”

Clarification is also needed about the “occasional camping” that would be allowed under this permit (see *Flathead Outdoors 2024 Temporary Special Use Proposal Map*). No information is provided about where camping could occur, the number of people who would be accommodated, nor any stipulations they must follow (besides food storage orders). This information should be disclosed to the public prior to issuing the permit.

Additionally, based on the maps submitted, Flathead Outdoors is requesting the ability to guide trips on virtually any open road or trail across the forest. This kind of blanket request is inappropriate for a temporary SUP. Flathead Outdoors should either have to amend their SUP request so that it identifies a limited number of roads and trails, or they should have to apply for a forest-wide permit and it should be held to a higher level of scrutiny than the temporary SUP process allows for. In the past, Flathead Outdoors has made statements on social media that were inconsistent with the realities of their SUP, which Flathead Forest staff have had to correct, claiming that they have exactly the kind of forest-wide authorization they are now seeking. An SUP should be limited in scope to a specific few roads & trails and not be a blanket permit for any open road or trail on the forest. We also question why, if it is true that Flathead Outdoors is requesting to use every open motorized road and trail on the forest, their SUP request is being

---

<sup>1</sup> Weaver, John. 2014. Conservation Legacy on a Flagship Forest: Wildlife and Wildlands on the Flathead National Forest, Montana. Wildlife Conservation Society Working Paper #43, p. 37.

<sup>2</sup> Flathead National Forest. 2023. Process and Guidelines for Temporary Outfitting and Guiding and Recreation Event Special Use Permits. P. 2.

evaluated by the Swan Lake Ranger District and not the Forest Supervisor's Office as other SUP's with forest-wide implications are.

## 2. StHealthy Events

More information is requested about details of this event. How many people would participate in the backpacking trip and on each of the day hikes? The synopsis lists 40 attendees. Would they all be on the outings together? If not, how would they be dispersed? How will campsites be selected? How will the approved area for rifle target instruction be selected. Will proper use of Bear Spray be included in the course? The Forest Service should require instruction on non-lethal measures to prevent conflicts with bears, including proper use of bear spray, as a stipulation of this permit. Will Fair Chase Ethics be included as part of the instruction? The Forest Service should encourage such instruction as part of this event.

## 3. Adventure Cycling Association

We have concerns around the potentially large group sizes, in their SUP request proposed group size is between 14-47, the upper number of 47 is far too large of group size for multiday bike trips. The forest should hold multi-day SUP's to much smaller group sizes, since they will have a larger impact on forest resources and wildlife. As well, the number of service days that Adventure Cycling is requesting (241) is larger than the allowable amount (200) outlined in the forest's scoping letter<sup>3</sup>. The Adventure Cycling SUP should be held to the maximum allowable number of 200.

## 4. Alpine Running Guides

We are pleased to see the requested permit does not include trails in recommended wilderness, and that it is in an area of lower quality grizzly bear habitat than the area in the Whitefish Range requested last year.

## 5. Doris Lake Trail 52

There are four (4) SUP requests (Big Sky Bible Camp, Whitefish Outfitters, Great Northern Wilderness Guides & Glacier Bikes & Hikes) which request the use of the Doris Lake/Mountain Trail #52, the total number of service days of these permits is 800, even if only a quarter of those service days actually go to Doris Lake (some of the permits request other areas, some do not), that is a high level of commercial use for one small lake and that's not counting individual users. The forest needs to take into account the high level of use that this trail is seeing and either deny several of the SUP's or it needs to reduce the number of service days allowed there. Given that most of those service days will be in July and August, when snow has melted and backpacking/hiking is most enjoyable, there is likely to be very few days when a commercial group is not camping at Doris Lake. This essentially locks the lake and camping up for commercial use and keeps individual users from being able to use the lake/trail. As well, the high number of service days being requested and the limited number of potential camp sites could lead to conflicts between permittees. The fact that these four permits are being evaluated by three (3) different ranger districts (Hungry Horse/Glacier View, Tally Lake and Swan Lake) is also cause for concern. While we would hope that the ranger districts would be consulting each other on these SUP's, the high number of requests for one lake/trail being evaluated by different districts leaves us concerned that the overall impacts of these SUP's is not being fully realized.

---

<sup>3</sup> Flathead National Forest. 2024 Summer Temporary Special Use Permits Scoping Letter, P. 1.

This is one more reason why we feel that the forest needs to do a more comprehensive assessment of recreation, including its SUP program. Additionally, the need for a robust monitoring program of the SUPs and their impacts is important to make sure that forest resources (*i.e.*, water quality, wildlife, lake shore) are not being degraded and that human impacts (*i.e.*, human waste, trampling of vegetation) are minimized.

#### 6. Whitefish Outfitters

Besides our concerns about Doris Lake, we also have concerns with Whitefish Outfitters requests for guiding approval in the Le Beau Research Natural Area (RNA), to Finger Lake in particular. Finger Lake is an incredibly popular destination in the summer and already sees a high level of use, with most summer days seeing an overfull parking area with people walking long distances along the road to get to the trailhead. While we feel the RNA is not a suitable location for commercial recreation, Finger Lake in particular should not be a destination for any SUP hiking given it's already crowded reality.

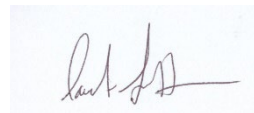
As part of their SUP request, Whitefish Outfitters also requests the ability to guide biking/e-biking trips on Red Meadow Loop. While e-bikes are not as large as ATV/UTV's, the Forest must treat them as motorized vehicles, per the Forests own regulations, and not allow for guided trips on the Polebridge side (east side) of Red Meadow road, just as they don't allow guided ATV/UTV trips on that section of road (Northwest Montana Adventures SUP request is only for ATV/UTV trips on the Tally Lake side of Red Meadow lake road). We know that at several of the North Fork Interlocal meetings that north fork residents have requested no guided motorized trips on that side of the Red Meadow Road, that request should be honored with regards to e-bikes as well.

Thank you again for the opportunity to comment. We look forward to continuing to discuss these and other concerns with Flathead staff directly in person. And we look forward to continuing to work with you to help ensure that recreation is managed in a publicly-transparent and accountable manner that protects the outstanding natural and social resource that presently exist on the Flathead National Forest, especially vital fish and wildlife habitat, clean air and water, wilderness character, wild rivers, and abundant opportunity for quiet recreation.

Sincerely,



Peter Metcalf  
Executive Director  
Glacier-Two Medicine Alliance



Sarah Lundstrum  
Glacier Senior Program Manager  
National Parks Conservation Association