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On behalf of membership of the Montana Outfitters and Guides Association (MOGA), 5 Microwave Hill Montana City, MT ((406) 449-3578, [moga@mt.net](mailto:moga@mt.net), and the Outfitter members permitted on the Custer Gallatin NF, I am submitting these comments in objection to the following proposals in the Draft Revised Forest Plan for the Custer Gallatin National Forest.

**By registering a formal objection to these provisions, MOGA and our members fully expect these issues will be included in the pre-decisional objection process, which will include our participation consistent with 36 CFR part 219.**

First, we thank the Forest for recognizing in the Plan the need and importance of outfitters and guides in providing recreational opportunities, economic benefits and environmental education. However, the future direction of the Forest plan appears to contradict and, in some ways, stifle these recognized and important benefits.

### **Objection Number 1**

In Chapter 2, page 134 of Proposed Forest wide Direction, the Guidelines (FW-GDL-REA) for Recreation Emphasis Areas state:

*"To accommodate under-represented communities, youths, seniors, and veterans, approval of new outfitting and guiding permits should emphasize proposals focused on experiential education."*

It is unclear to us if the Forest Service has any data specific to the Custer Gallatin National Forest to justify classifying these user groups as "underrepresented" when compared to say "families". The fact that the Forest appears to be preferring these user segments over families is inappropriate and troubling and we object to it. Furthermore, experiential education is not defined in the proposed plan, so it is difficult to understand what is meant by it or how it differs from the experiences and educational benefits of services already provided by outfitters who pay taxes and use fees, which directly benefit the National Forest administrative and management activities.

We believe there are strategies that would enable these user segments to be accommodated and their participation enhanced by connecting groups representing these user segments with many permit holders where capacity is available. We look forward to working with you to develop such a strategy.

### **Objection Number 2**

We object to the provision, In Chapter 2, page 116 in Guidelines (FW-GDL-DWA) which states:

*"05 To protect social and ecological conditions, outfitter, and guide service days should not be increased beyond existing authorized use levels within wilderness."*

Without any empirical evidence, the plan implies that permitted and highly regulated outfitted activities in wilderness have a higher impact than unregulated and unpermitted activities. This implication is illogical but perhaps indicative of a bias against necessary commercial services and may result in outfitters opposing new wilderness designation for fear their permits will be sacrificed to this biased interpretation. The Forest also fails to identify the "social conditions" that have resulted in this proposal. We will not support a baseless moratorium on additional service days for the outfitted public under permit where capacity is available and deemed necessary to accommodate the public. Therefore, we object to this Guideline.

To resolve this issue, this provision should be stricken and replaced with a statement that encourages additional service days for the outfitted public where capacity exists, and those days are necessary to fulfill the recreation purposes of The Wilderness Act. The Forest plan should identify in general the guidelines that would indicate the circumstances that would lead to additional service days for the outfitted public in designated Wilderness.

Thank you for your consideration of our comments and the receipt of our formal objection to be included in the pre-decisional objection process, which will include our future participation consistent with 36 CFR part 219.

Sincerely

Mac Minard  
Executive Director, Montana Outfitters and Guides Association