

**Extent Necessary/Needs Assessment Analysis for Outfitting and Guiding
Bob Marshall Wilderness Complex**



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Background

Under section 4(d)(5) of the Wilderness Act of 1964, 16 U.S.C. 1133(d)(5), authorized officers may authorize commercial services such as outfitting and guiding in wilderness to the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas. Recent case law has affirmed this decision space and required documentation of the “extent necessary”. The Extent Necessary Determinations for Authorizing Outfitter and Guiding in Wilderness Framework (2020) as referenced in the U.S. Forest Service’s Wilderness Stewardship Performance Guidebook support toolboxes provides a framework that can be used to assist in the decision-making to authorize outfitting and guiding in wilderness. The framework is based on guidance from the Interagency Visitor Use Management Council’s (IVUMC) Visitor Use Management Framework, a long history of individual forest projects that authorize outfitting and guiding, and the National Park Service’s *Extent Necessary Process* for authorizing commercial services in wilderness. The steps in this framework can be used for making extent necessary determinations for all outfitting and guiding permits within a particular wilderness.

In determining whether and to what extent outfitting and guiding are necessary in wilderness, the Extent Necessary Determinations for Authorizing Outfitter and Guiding in Wilderness Framework follows a three-step process:

1. Determine whether the activity supported by the outfitter and guide is proper for realizing a wilderness purpose.
2. If the activity supported by the outfitter and guide is proper for realizing a wilderness purpose, determine whether outfitting and guiding are necessary to conduct that activity in wilderness.
3. If the activity supported by the outfitter and guide is proper for realizing a wilderness purpose and if outfitting and guiding are necessary to conduct that activity in wilderness, determine the extent of outfitting and guiding necessary to conduct that activity.

This Extent Necessary/Needs Assessment Analysis for Outfitting and Guiding in the Bob Marshall Wilderness Complex will follow this framework and includes still-relevant concepts established in earlier BWMC Needs Assessment and Extent Necessary Analyses, and it also considers capacity and allocation of use.

Introduction

Bob Marshall Wilderness Complex Overview

Spanning the Continental Divide in northwestern Montana, the world-renowned Bob Marshall Wilderness Complex (BMWC) comprises three contiguous wilderness areas: the Bob Marshall, the Scapegoat and the Great Bear Wildernesses (see figure 1 for a wilderness vicinity map).

The Bob Marshall Wilderness Complex is jointly managed by five ranger districts on four National Forests and covers more than 1.6 million acres of remote, wild, and undeveloped land. Its longest axis, near the town of West Glacier at the northern boundary to the Rogers Pass area in the south, extends 110 miles. Nearly 400 miles of highway encircle the BMWC. Its size, resource values, and potential for outstanding primitive recreation opportunities make the BMWC a national and international treasure, as well as a flagship wilderness complex in the National Wilderness Preservation System.

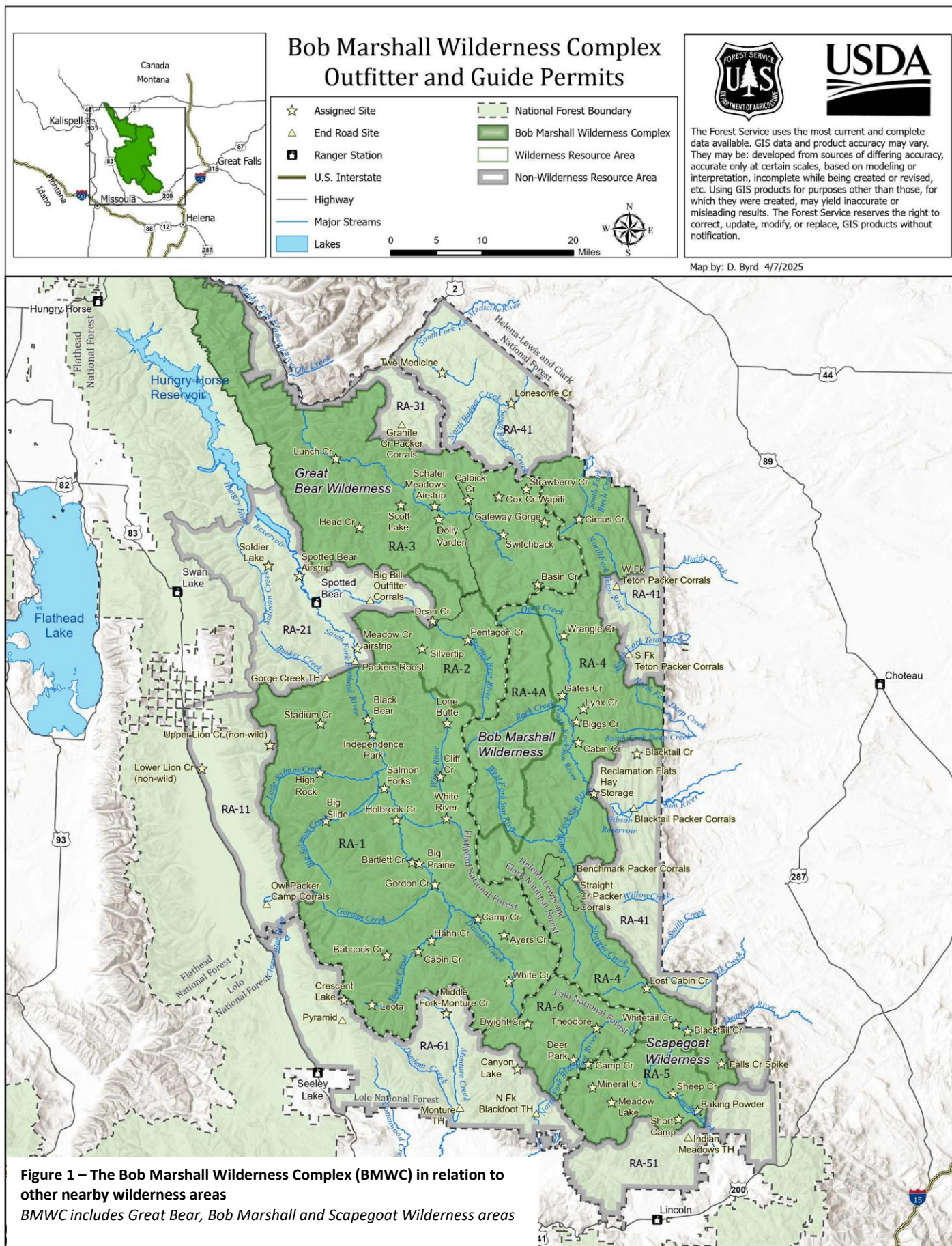
The BMWC's topography ranges from rugged ridge tops and alpine meadows to forested slopes and river bottoms. Numerous intact functioning ecosystems — on both sides of the Continental Divide — shelter significant biological diversity, including several threatened and endangered species, such as grizzly bears and bull trout.

BMWC visitors have an opportunity to experience significant solitude, challenge, and remoteness in rustic, undeveloped settings. Such experiences can test visitors' self-reliance and can engender deep appreciation: for the value of wilderness; for senses of place and history; and for the natural environment. Media — like visual arts, music, literature, and storytelling — can introduce these wilderness values, but cannot stand in for the experiences and lessons of a wilderness visit.

The BMWC's unique combination of features provides outstanding opportunities for visitors to experience a diversity of scenic, recreational, and educational endeavors. Backpacking, hiking, animal packing, big-game hunting, fishing, caving, river rafting and an active backcountry airstrip all provide a mix of both outfitted and non-outfitted recreational opportunities.

Summary of the Proposal

The proposed action is to reauthorize existing outfitter and guide permits which includes the associated priority use allocation systems and a total of 30,000 currently allocated service days as well as the currently authorized and currently authorized assigned sites as established in the current permits. These operations provide a wide range of services to visitors; this includes 63 permits and 30 wilderness or wilderness adjacent assigned sites, with the following use types: Summer Roving (stock supported or backpacking), Fall Hunt, Day Use, Spring Bear Hunt, River Float/Fish, Drop Float, Take Out Float, Lion Hunt, Winter, Canoe, and Air Livery services. These permits proposed for reauthorization include a current capacity of 30,000 service days distributed through an administratively determined system of priority use and priority use pools, consistent with Forest Service Handbook 53.1f (3) and 53.1(n) and (o). This system was established decades earlier and has been validated through 3 cycles of NEPA projects and 4 cycles of reallocation. For this Extent Necessary/Needs Assessment, the connections and impacts to wilderness character are being considered holistically and cumulatively.



Step 1. Are the activities supported by the outfitter and guide proper for realizing a wilderness purpose?

Multiple sources provide information supporting the potential “for realizing a wilderness purpose” regarding permitted outfitting and guiding for recreational and other uses of the Bob Marshall Wilderness Complex.

Wilderness Act: Section 4.(b) of the Wilderness Act states “wilderness areas shall be devoted to the public purposes of recreational, scenic, scientific, educational, conservation, and historical use.” The outfitter and guide services in the proposal under consideration in the BMWC are in alignment with the public purposes identified in the Wilderness Act.

Recreational – The primary purpose of most outfitted and guided trips into the BMWC is recreation. Trips and services that are recreational in nature include fishing, hiking, floating, horseback riding, hunting, photography, and enjoyment of the wilderness areas.

Though guided services for winter use activities are currently at modest levels, activities requested like dogsledding, cross-country skiing, and, snowshoeing fit the recreational purpose and could potentially be appropriate. Another category of proposed use — “exploration/adventure” — includes activities such as mountaineering, caving, and climbing, and may also be in alignment with multiple purposes identified in the Wilderness Act.

Scenic – Respondents to National Visitor Use Monitoring surveys frequently mention viewing the scenery as one of the central purposes for their visit to the Bob Marshall, Great Bear and Scapegoat Wilderness Areas. Individuals, groups, organizations, and agencies that commonly use and rely upon outfitted services for their recreational benefits also realize scenic benefits from their wilderness visits, even when not the primary purpose of their trips to wilderness. Outfitters and guides make it possible for many people to see and appreciate the spectacular scenery throughout the BMWC.

Scientific – The size, natural and undeveloped qualities, and ecosystem diversity of the BMWC provide for many scientific research opportunities. The distances to remote research destinations often require research equipment and supplies be packed in with pack animals. Forest Service packers and pack stock do not have the capacity to support all of the research projects in the BMWC; researchers often need to employ commercial outfitters to support their packing needs. Without this option, researchers may be forced to select less-ideal locations to conduct research, seek exceptions for otherwise prohibited tools, or forgo research altogether. Recent examples of scientific research efforts aided by outfitters include: Forest Inventory Analysis data collection; Montana Fish, Wildlife and Parks fish population monitoring, management, and rehabilitation efforts; wildland fire research conducted by Research Stations and universities; cave exploration and mapping; vegetation change research; and grizzly bear DNA studies.

Educational – The BMWC offers a unique setting for learning. Agencies, organizations, universities, and individuals use the BMWC to educate people on numerous subjects. Several outfitters provide pack support for educational or youth trips, transporting base camps, personnel, and equipment, while others supply guides for backpacking trips. Outfitters and their guides offer a range of educational opportunities in the BMWC, from backcountry and horsemanship skills to ecosystem interactions and wilderness stewardship. Institutions operate under outfitting permits or hire outfitters for educational and training trips into the BMWC. Specialized youth counseling groups as well rehabilitation programs utilize the Bob Marshall Wilderness Foundation (BMWF) and outfitters to guide and support their educational efforts. Opportunities for solitude and primitive and unconfined recreation in areas removed from civilization in areas removed from signs of civilization, are critical for counseling or personal growth-based trips. The BMWC's undeveloped and natural qualities also provide an excellent backdrop for more traditional educational instruction. Wilderness is an appropriate setting for education related to wilderness stewardship and practical applications of low-impact techniques like Leave No Trace.

Outfitters fulfill a role in educating the public about proper wilderness stewardship and practices. Each outfitter is required through the permit terms and conditions and operating plans to provide clients with instruction in basic wilderness awareness, recreating safely in bear country, and Leave No Trace practices. Although the Forest Service has programs in place to educate users on the value of wilderness and minimum impact techniques, it is limited in available resources and cannot reach all wilderness users. The outfitting and guiding industry effectively partners with the Forest Service to increase the number people exposed to educational messages that build appreciation for the benefits wilderness provides to everyone.

Conservation – Outfitters contribute to conservation and stewardship of the BMWC by facilitating public access into the wilderness, promoting responsible wilderness use, and fostering a conservation ethic. Outfitters help with resource stewardship by setting a good example for the public, helping clear and maintain trails, monitoring and reporting conditions, and working with Forest Service staff to facilitate volunteer projects. Outfitters and guides assist in conservation of the wilderness resource by furnishing equipment, skills, and other resources which are beyond the reach of many members of the public but are needed to minimize visitor impacts to the wilderness resource. Additionally, outfitters practicing and coaching their clients in sustainable hunting and fishing practices as authorize by MT FWP are delivering on the value of conservation and stewardship in Montana.

Outfitters also fulfill an important role in supporting conservation projects and activities on the BMWC by providing pack support for a variety of partner organizations. Agencies such as Montana Fish, Wildlife and Parks (MFWP), United States Geological Survey (USGS), and a variety of volunteer and community groups engaged in resource and conservation work hire outfitters to support their efforts. The Bob Marshall Wilderness Foundation (BMWF), a partner organization which organizes service trips to assist with trail maintenance, removal of litter,

erosion control, fire and campsite restoration, and other conservation-related projects often depends upon outfitter services to support their volunteer service trips.

Historical – Outfitters operate today in much the same way they did many decades ago, providing visitors with a chance to experience the wilderness pack stock tradition of Bob Marshall country or travel by foot to areas used by early settlers or native tribes. Outfitting and guiding with stock was recognized as needed and authorized by the Forest Service as early as 1919, in what is now the BMWC, in large part due to the geographic expanse of unroaded terrain. The historical contribution of outfitters and guides is valued by wilderness users because it echoes an experience recalling the western tradition. Many outfitters operating in the BMWC are well-versed in the history, traditions, and cultural significance of the area and maintain the historic practices of using the unique landscape for all of the purposes identified in the Wilderness Act. Sharing this knowledge enriches visitors' experiences and their appreciation of the historic aspects of wilderness character in the BMWC.

Additionally, the National Historic District features and other Forest Service administrative sites are of historical value in the BMWC, as the last intact vestige of the “continental system” of backcountry administrative buildings, trails and phone lines for early 1900’s forestry work and wildfire response in national forests. Today, these features are attractions in the wilderness to visitors both as relics of another time but also as living history as the Forest Service staffs and uses these features in the same ways for over a century. Outfitters enable visitors to satisfy their curiosity about these historic features in the remote wilderness.

Enabling Legislation:

Bob Marshall Wilderness

Public Law 88-577 – The Wilderness Act, 1964: No special provisions regarding appropriate uses for this wilderness.

Public Law 95-546 – No official title, designates Great Bear Wilderness and Bob Marshall Wilderness addition, 1978. No special provisions regarding appropriate uses for this wilderness.

Public Law 113-29 – National Defense Authorization Act for Fiscal Year 2015, 2014. No special provisions regarding appropriate uses for this wilderness.

Scapegoat Wilderness

Public law 92-395 – No official title, designates Scapegoat Wilderness, 1972. No special provisions regarding appropriate uses for this wilderness.

Public Law 113-29 – National Defense Authorization Act for Fiscal Year 2015, 2014. No special provisions regarding appropriate uses for this wilderness.

Great Bear Wilderness

Public Law 88-577 – The Wilderness Act. Regarding special provisions, Section 4(d)(1): *The following special provisions are hereby made: Within wilderness areas designated by this Act the use of aircraft or motorboats, where these uses have already become established, may be permitted to continue subject to such restrictions as the Secretary of Agriculture deems desirable.* Establishment and aircraft use of Schafer Meadows Airstrip occurred prior to the 1964 Wilderness Act

Public Law 95-546 – No official title, designates Great Bear Wilderness and Bob Marshall Wilderness addition, 1978. No special provisions regarding appropriate uses for this wilderness.

The House Committee Report (95-1616) on the Great Bear Wilderness Act states: “The proposed Great Bear Wilderness contains a grass airstrip in Schafer Meadows which is used primarily for recreation access by commercial outfitters and the general public. This area was included in the wilderness with the specific understanding that the Forest Service will not act to phase out public use of the airstrip. The committee notes that section 4(d)(1) of the Wilderness Act allows for such use to continue, and instructs the Forest Service to manage the area so as to provide for continued access to the airstrip for public aviation. However, the committee agreed that the Forest Service should not permit the installation of new navigational equipment, paving or hard surfacing of the airstrip, or otherwise significantly upgrading the current facility. The question of the level of use was also discussed by the committee, recognizing that the area may become increasingly popular for aviation use in the future. In general, the committee directs that the existing level of aviation use by the public (including commercial outfitters) be allowed to continue, but that greatly expanded use may be reasonable regulated by the Forest Service to protect wilderness values. At some future date this may entail restricting the number of flights per day, and the prohibition of ‘touch and go’ landings for training purposes.”

Forest Service Policy: Forest Service Manual 2323.12 (4) established a relevant policy: Consistent with management as wilderness, permit outfitters/guide operations where they are necessary to help segments of the public use and enjoy wilderness areas for recreational and other purposes.

Land Management Plans: Land management plans for the Flathead, Helena-Lewis and Clark, and Lolo National Forests all address outfitter and guide service opportunities.

Flathead National Forest (2018)

Desired conditions (MA1a-DC) 06: Existing outfitter and guide service opportunities are maintained in the Bob Marshall Wilderness Complex and the Mission Mountains Wilderness as determined by identified public need.

Desired conditions (MA1a-DC) 07: The Schafer Meadows airstrip serves as an airplane-accessible trailhead.

Guidelines (MA1a-GDL) 02: To protect the social and ecological conditions within the Flathead National Forest portion of the Bob Marshall Wilderness Complex, additional outfitter and guide permit use levels should not be issued nor should approval be granted to expand operations beyond 17,953 days for the Flathead National Forest service day use in all seasons of the 30,000 service days authorized across the Bob Marshall Wilderness Complex.

Desired conditions (FW-DC-IFS) 13: Existing airstrips on NFS lands (Condon, Meadow Creek, Spotted Bear, Schafer Meadows) are maintained to provide for quality recreational opportunities and administrative needs.

Guidelines (FW-GDL-IFS) 11: To provide safe and functioning airstrips, management and maintenance of airstrips should follow Federal Aviation Administration recommendations.

Standards (GA-MF-STD) 01: The Schafer Meadows Airstrip provides public and administrative access for small aircraft, not exceeding 550 landings annually.

Helena-Lewis and Clark National Forest (2021)

Designated Wilderness (WILD), Desired Conditions (FW-WILD-DC) 06: Outfitter and guide opportunities provide services that respond to relevant public need.

Public Information, Interpretation, and Education (CONNECT), Goals (FW-CONNECT-GO) 08: Outfitter and guides, recreation events, and other special uses permit holders assist the Forest in delivering interpretation and education messages that instill an appreciation for the natural and cultural resources of the Forest and promote conservation and stewardship.

Lolo National Forest (1986)

There are no specific goals, desired conditions, or guidelines in the Lolo National Forest Land Management plan, although there are detailed standards which imply desired conditions supportive to allowing outfitter and guiding services.

Bob Marshall, Great Bear, Scapegoat Wildernesses Recreation Management

Direction (1986): This management plan provides direction for all three national forests regarding monitoring impacts of all forms of recreational use on the wilderness resource, particularly elements of the Solitude or Primitive and Unconfined Recreation quality. It also identifies potential management actions to mitigate impacts. Given that recreational use is one of the purposes of wildernesses, the plan provides direction around facilitating that use in a variety of forms, including outfitted and guided opportunities.

Conclusion: The proposed activities supported by outfitters and guides are proper for realizing the public purposes of these wildernesses, including for recreational, scenic, scientific, educational, conservation, and historical use. The proposed outfitted activities are consistent with applicable laws, regulations, directives, and land management plans. There is congressional intent for the continued motorized aircraft landing at the Schafer Meadows airstrip, including outfitted/livery use, in the Great Bear Wilderness.

Step 2. Is outfitting and guiding necessary to conduct the activities in wilderness?

Multiple factors inform the necessity of outfitter and guides to conduct the proposed activities in the Bob Marshall Wilderness Complex.

A. Specialized Knowledge, Skills, and Equipment

A variety of specialized knowledge, skills, and equipment is needed to provide access to people who would otherwise not be able or willing to visit. Some common examples are noted here:

Given the BMWC's size, it is not uncommon that visitors seeking locations with high degrees of remoteness and solitude need pack stock services (commonly captured under the Summer Roving and Fall Hunting/Roving categories). Inherently, safe handling of pack stock requires specialized knowledge and skills as well as specialized equipment (stock itself, trailers, tack, off forest stock containment facilities). Many prospective visitors to the BMWC seek the specialized knowledge, skills, and equipment associated with pack stock services to access their wilderness resource.

An increasing popular form of wilderness primitive recreation in the Bob Marshall Wilderness Complex is Drop Camp service, where an outfitter packs a party into a remote location of the groups choice and leaves them with their gear to explore their unconfined recreation opportunities on their own, and then picks them back up to pack out at the end of their itinerary. This mixing of a privately lead trip using an outfitter for a portion of the trip allows those visitors to optimize their wilderness experience, by using an outfitter's specialized knowledge, skills, and equipment for the specific portions of the visit, and they rely on their own wilderness knowledge and skills for the balance of the visit. Additionally, the Drop Camp service type enables visitors to use the gear of the outfitter, including the various bear resistant storage systems (bear resistant coolers, electric fences, etc); this is sometimes expensive equipment to procure and can be a barrier for some who may only need that equipment when visiting the BMWC.

Opportunities for whitewater rafting/packrafting (class 3-4 waters) and high-quality fishing exist in several BMWC waterways, and some visitors need the rafting guides' technical skills and specialized rafting equipment to safely visit these high-risk, high-consequence waters. A hybrid type of stock-supported river recreation requires outfitter and guide services, for visitors who do have the knowledge and skills to take on the rafting element, but are in need of the pack support to get their equipment to the remote locations along the waterways; outfitters fill a niche to support do-it-yourself river users who are in need of service in the Drop Float category.

Various high-quality hunting and fishing opportunities exist in the BMWC. Some visitors need and or want the support of a licensed guide to ensure they are both conducting their hunt in accordance with Montana Fish, Wildlife and Parks regulations and meeting the demanding requirements of bear-aware practices to prevent grizzly bear conflicts. These activities are captured under the Fall Hunting, Spring Bear, and Lion Hunt categories. More broadly, many

wilderness activities may feel beyond visitors' reach due to the challenge of safely recreating in grizzly bear country; while the adventure of recreating in bear country is a thrill, some visitors feel they are only up to that challenge with the knowledge and skills of a guide.

Additionally, there are valued fisheries present in the BMWC, with healthy bull trout populations present in the South Fork in particular crossed with the extremely rare opportunity to fish for bull trout there. Following the proper catching, handling, and reporting requirements by Montana Fish, Wildlife and Parks with the assistance of a knowledgeable guide is a common sportsman's ethic (captured under the Fishing category).

All activities in the BMWC require the knowledge of the extensive trail system and its varying conditions; some trails are routinely maintained, while some represent historic travel ways. While the Forest Service is working to share trail conditions in interactive reporting so that visitors can plan their own trips, guides with knowledge of the typical trail conditions and the ability to navigate them with visitors and equipment lowers the barrier to entry to wilderness recreation. An extended challenge is navigating the wilderness during fire events and in post-fire conditions — increasingly common as fire is allowed to play its natural role in wilderness. There are numerous examples of permitted outfitters providing quality service to their clients and even other unguided visitors whom they encounter during fire events by working with their permit administrators to adjust plans and stay up-to-date on dynamic conditions. These visitors can thus observe the powerful effects of fire at appropriate distances. There are also as examples of outfitters and guides offering post-fire educational opportunities in recently burned areas, and providing the technical ability to travel through recently burned areas, sometimes requiring extensive physical labor to make a trail passable.

There is a small and avid group of backcountry aviation enthusiasts both own their own aircraft and have the skills to operate and land it at an unimproved airstrip, but most prospective Schafer Meadows airstrip visitors lack those assets; hiring an air livery service permit holder is the only way to visit the Schafer Meadows airstrip and the greater area in the way Congress intended.

People with disabilities sometimes seek the services of an outfitter and guide to experience the BMWC; Forest Service staff routinely field requests for referrals people wishing to visit wilderness to seek adventure and rejuvenation while balancing the challenges of recreating with disabilities. Thoughtful consideration is given to connecting these visitors with permitted outfitters with the knowledge, skills, and equipment ready to accommodate and serve their needs.

B. Enhancing Visitor Understanding and Appreciation of Wilderness Character

Permitted outfitters in the BMWC provide support to visitors so that they may witness and experience wilderness character in real, tangible ways; outfitters and guides also provide educational information and real-time interpretation of the qualities of wilderness and their relationship to each other. BMWC permit administrators are implementing the principles

embedded in the Forest Service's Wilderness Stewardship Performance Program: Outfitters and Guides Element, which include expectations and requirements for outfitters to incorporate awareness of wilderness values as part of their business model. Examples currently used in the BMWC include informing clients about wilderness values; educating visitors about Leave No Trace skills and backcountry etiquette; and educational resources provided by administrators to permit holders via annual operating meetings, the traditional spring Limits of Acceptable Change public meeting, Professional Wilderness Outfitter Association and Montana Outfitter and Guide Association meetings, and the annual Spit and Whittle meeting. Additionally, wilderness education plans and primary resources are shared with outfitters and guides so that they are informed about the BMWC wilderness character and are prepared to share this information with their clients and others.

Permitted outfitters and guides can provide access to and an understanding of the BMWC's unique character; below are some reflections on how outfitters and guides can provide such context, broken down by wilderness quality. The wilderness character themes identified here are expressions of the wilderness character identified in the Bob Marshall Wilderness Complex Character Narrative (2021), which describes the wilderness areas' uniqueness and the special nature of the whole wilderness complex. Additionally, elements of the area's wilderness character are identified in qualitative terms through the Wilderness Character Baseline (2022).

Untrammeled: A major element of the Untrammeled quality of the BMWC includes the history of managers demonstrating management restraint inside of these wilderness areas as compared to adjacent non-wilderness lands. This dynamic is most obviously represented by the extent to which managers have allowed fire to play its natural role on the landscape, fulfilling the goal of the untrammeled quality: that the ecosystem is essentially unhindered and free from modern human control or manipulation. When outfitted visitors encounter the extensive scope and scale of the fire history in the BMWC, guides are prepared to provide interpretation of this visible and tangible expression of the untrammeled quality; the initial observation of fire and its effects may be unnerving to a novice wilderness visitor, but educated guides are empowered to share that there is value in humans exercising restraint in wilderness. Forest Service permit administration staff, along with fire staff and line officers, have invested deeply in the permitted outfitter and guides by sharing perspectives and knowledge on this nuanced topic so that they are able to share this with their clients and other visitors.

Natural: Elements of the Natural quality of the BMWC include intact, fire-adapted ecosystems with habitats supporting native fisheries, wildlife, plant communities; high water and air quality along with properly functioning watershed condition classes; low presence of invasive species. Many of the authorized activities offered through outfitters are directly entwined with these elements, such as excellent hunting and fishing opportunities; observing fresh clean water and air while traveling through the wilderness; learning about resilient ecosystems that are rare or not seen elsewhere from trained guides.

Undeveloped: Components of the Undeveloped quality in the BMWC include limited non-recreational physical development, highly limited administrative use of motorized vehicles/equipment, and mechanical transportation, and only one special provision allowing the use of motorized equipment (at Schafer Meadows). Outfitters and guides are prepared to share the value of undeveloped areas and the specific forms of it in the BMWC with their visitors and others. Rich discussions are held between the outfitter and their clients about what to expect in terms of access to few to no developed recreation resources. It is a point of pride for many wilderness outfitters to show case the undeveloped quality of the BMWC to their clients.

Some of the permits allow assigned sites in the wilderness which a permitted form of development in wilderness, though this limited. Of the 63 permits in the proposed action, 39 have assigned sites, and 24 do not have an assigned site. Assigned sites do allow some specific developments within the site, such as corral(s), hitch rail(s), and meat pole(s); the assigned site development is usually associated with stock containment. Camp management plans may allow additional developments. The intent for allowing limited developments in the assigned sites is to concentrate use so that it does not impact a greater area. This is considered a best practice for Leave No Trace: Travel and Camp on Durable Surfaces. There is a dynamic tension between balancing limited development and facilitating one of the purposes of wilderness, the primitive recreational opportunities. Assigned sites are intermittently inspected to ensure structures are kept to temporary, as needed basis and are still highly primitive sites in contrast to developed campgrounds found in front country recreation areas. Assigned sites which are unused for a period of time are evaluated for being pulled back to the status of unassigned camp, available for roving use only. The developments at assigned sites are accounted for in the BMWC Limits of Acceptable Change program. These assigned sites aside, much outfitter use is based out of roving camps, where camp elements are removed from the site when not in use, and left in as near natural condition for other visitors to discover and enjoy on their visit to the BMWC.

The outfitter livery permits are authorized because of the special provision regarding the continued use of Schafer Meadows Airstrip in the Great Bear Wilderness. Outfitters and guides in that area offering hunting, fishing and white-water rafting services based out of Schafer Meadows often interpret the juxtaposition of landing aircraft into wilderness: that generally, motorized transport is not allowed in wilderness areas; however, in this one instance in the entire BMWC, Congress expressed its intent to allow for an exception. Outfitters and guides here provide a wilderness civics lesson for their clients.

Solitude or Primitive and Unconfined Recreation: Themes in the Solitude or Primitive and Unconfined Recreation quality include limited encounters with other parties, lightly impacted camping sites, limited recreational features, few visitor restrictions, and high-quality and rare primitive recreational experiences.

Outfitters can offer experiences that connect visitors with opportunities for solitude in the BMWC because they use their knowledge of visitor use patterns, access points, and the trail systems while also complying with direction in their permits to disperse use and avoid areas of

concentrated use when possible. Opportunities for primitive and unconfined recreation are abundant in the BMWC, and the use of pack stock, technical river rafting, and even recreating in bear country are classic examples. Outfitters skillfully use pack stock and expose and train visitors in safe stock interactions, an experience rarely had in this day and age. Guides use a variety of techniques to prevent bear conflicts, enabling their clients to enjoy the adventure of recreating in bear country while actualizing the humbling reality that they are not at the top of the food chain in this wilderness landscape. Recreational cave exploration is a niche primitive and unconfined recreation opportunity in the BMWC; many cave visitors require support of outfitters due to their supply and equipment transportation needs. Without the capacities of outfitters and guides, visitors needing that support service would have reduced capacity to experience outstanding opportunities for solitude or primitive and unconfined recreation in the BMWC.

Other Features of Value: There are a variety of Other Features of Value in the BMWC, all of which outfitters provide a necessary connection. Some of these themes were addressed earlier in Question 1 regarding the wildernesses public purposes of recreational, scenic, scientific, educational, conservation, and historical use, and are addressed here in the context of wilderness character.

The Flathead National Forest Historic District on the National Register of Historic Places, as well as the other historic administrative facilities in the BMWC, are considered valued destinations by visitors; prospective wilderness visitors seek out outfitter itineraries which will take them to these sites. Here, they may see and learn about these historical ways of being and living in the wilderness landscape, as well as interact with Forest Service personnel still living and working in traditional ways. Outfitters enable to visitor to see the remote, historical features.

Historically, outfitting in wilderness as a livelihood is a tradition in the BMWC; outfitting in the wilderness areas predates wilderness designation, extending back to the early 20th century. Early outfitters were well-known in the area and have even had destinations named after them. Murphy Flats, named after Joe Murphy of Ovando, is one such example. Murphy started packing hunters into the South Fork area in 1919, and he and his family brought hunting and fishing parties into this area for 45 years. The Forest Service first issued Murphy a special use permit in 1922, which he operated until 1937. This operation continues to exist today, and the current outfitter retains ties to the Murphy family. There are several 3rd and 4th generation outfitters in the BMWC whose operations have been authorized since the 1940's and 1950's; the Rich Ranch operation is one such example. These outfitters in particular demonstrate pride and passion for their work and for the land. They impart to their clients the value and the spirit of wilderness, emphasizing the past, the present, and the future. Prospective wilderness visitors sometimes seek out outfitted trips just to participate in this traditional way of experiencing the BMWC.

Scientific and research opportunities exist in the BMWC, and authorized research through permits and/or agreements improves the Forest Service's understanding and stewardship of the resources within the area. Additionally, some BMWC based research has contributed to greater understanding of other western US forested landscapes. Examples include fire science research, which is informing fire management strategies outside of wilderness, development of wilderness social science monitoring methods in the Limits of Acceptable Change program which is now used internationally in protected areas, and studies of the healthy grizzly bear, bull trout, and even wild bee populations which influence federal and state fish and wildlife agencies' regional management plans. Outfitter services are often a critical link for the researchers performing their work in the BMWC in that the outfitters are available to provide the necessary packing and other logistical support required to work in such a large landscape. Outfitters supporting researchers are able to craft professional logistical support plans to meet the needs of researchers engaging with their valuable work.

There are a variety of intrinsic values of the BMWC, a few are identified here that have strong connections to outfitter and guide services. Wilderness stewardship partnerships abound in this wilderness landscape, and volunteer opportunities are both bountiful and in demand as people from across the country and even internationally seek to give back to the wilderness itself and the other visitors by performing trail maintenance, invasives management, and citizen science projects. Entire organizations such as the Bob Marshall Wilderness Foundation and Montana Conservation Corps exist to channel this energy to benefit the wilderness but also to enrich the lives of the volunteers too. Several of these stewardship partnership organizations in the BMWC with the support of the Forest Service have initiatives to introduce youth and under-represented populations to wilderness to broaden the constituency that finds wilderness relevant while benefiting the wilderness simultaneously. To support these partnered stewardship projects which also increase connections of the volunteers to the wilderness resources, outfitter and guides are needed for logistical support. Though the stewardship projects are authorized through the Forest Service's partnership authorities, the wilderness managers themselves are not always able to provide that logistical support, and outfitters are able to fill that gap, ensuring that these complex group and individual connections to the intrinsic value of wilderness are sustained.

Another intrinsic value of the BMWC is the story of land and resource conservation and preservation, and visitors desire to connect personally with that legacy. This history of wilderness as a concept and its various pathways to designation as well as the origin of the Wild and Scenic Rivers Act is embodied here. It is common for visitors to express a desire to connect in person with the places that inspired these keystones in the American conservation movement. Informed guides offer the access and interpretation for those seeking this interpersonal connection.

C. Need to Protect Wilderness Resources

Wilderness resources benefit from the presence and services of permitted outfitter and guides in the ways they are able to directly help protect the wilderness resource with their guest and indirectly through modeling ethical behavior and imparting skills to others. Examples include guides working to prevent bear conflicts by ensuring their groups adhere to proper bear attractant storage requirements and using other strategies to avoid conflicts while traveling (i.e. making noise, carry bear spray, etc). By both using these methods with their parties and modeling the behaviors for other non-guided parties to learn from, permitted outfitter and guides help the Forest Service and Montana Fish Wildlife and Parks meet goals related to grizzly bear population recovery by reducing the likelihood of human-to-bear conflicts. Bull trout and other native fish are a highly valued resource in the BMWC; guides help ensure proper catching, handling, and reporting requirements by Montana Fish Wildlife and Parks are adhered to help sustain this wilderness resource. Fishing guides are required to take Montana Fish Wildlife and Parks bull trout identification training through a requirement in the permits.

More broadly, permitted guides capture teachable moments centered on protecting the wilderness for their guests, as well as modelling these values to unguided visitors who are more likely to adopt these best practices when they see it occurring live in the wilderness. As examples, the Leave No Trace principle of traveling and camping on durable surfaces is modeled by permittees because their itineraries are screened by the Forest Service before operations begin and are sometimes restricted to already impacted designated sites so that impacts are not spread further. The Responsible Recreation principle of don't spread invasive weeds is modeled by outfitters as they are required to use weed-seed free hay and pellets, and their operations including the feed used for stock are inspected by permit administrators. Wilderness resources benefit when outfitter and guides are present to use and demonstrate these kinds of conventions.

D. Wilderness Setting

Outfitting and guiding services in the BMWC are directly tied to that wilderness setting and are necessary for some visitors to experience and explore the wilderness resource. The geographic centric nature of some of the authorized activities such a whitewater rafting in the fabled upper Middle Fork, fishing for bull trout in the South Fork, and visiting the Chinese Wall are flagship examples of the BMWC specific setting for outfitted wilderness experiences. The BMWC hosts special hunting and fishing opportunities rarely if at all found elsewhere, including the early rifle season hunt (understood to be the earliest opening rifle season in the country) and a bull trout fishing season (one of the only in the country). Wilderness based education is embedded into permitted activities, with classic examples found in the summer roving types of trips that specialize in outfitting family and friend groups experience the wilderness resources through a series of locations across the BMWC. Additionally, as expressed in the BMWC Wilderness Character Narrative, outfitters are an intrinsic part of the BMWC wilderness landscape, offering

a traditional/historic human experience connection in this wilderness' setting. Connections to the wilderness are built through the in-place visitation provided by BMWC outfitter and guide services.

Conclusion: Outfitting and guiding services are necessary to conduct the types of recreational and other activities that relate to the purposes of the Bob Marshall Wilderness Complex for a variety of reasons. There are multiple factors leading to this conclusion, including the range of ways permitted outfitter and guides can offer their specialized knowledge, skills, and equipment to facilitate visitors seeking out a BMWC experience, how they are able to enhance visitors understanding and appreciation of the BMWC's special character, how they can help protect wilderness resources, and how they are intrinsically tied to the wilderness setting while also offering a means of experiencing inherently wilderness based recreation visits.

Step 3. To what extent is outfitting and guiding necessary to conduct the activity in wilderness?

The following questions are posed to answer this question.

- Has monitoring of wilderness character indicated a downward trend in the area proposed for use?

The BMWC is actively engaged with Wilderness Character Monitoring, with BWMC Wilderness Character Baseline Assessment Report (2022) establishing the measures and baseline conditions of all the qualities of wilderness and ongoing monitoring occurring at this time. This monitoring program follows the Forest Service's Wilderness Character Monitoring Technical Guide (2020) and aligns with the interagency strategy for monitoring wilderness character, Keeping It Wild 2 (2015). Trend data collected over the last 5 years will be available for analysis starting in FY 2026 the BMWC. The baseline assessment indicates strengths, threats, and recommendations for managers working to preserve wilderness character. The noted threats include lack of coordination with external agencies and organizations performing wilderness stewardship, increasing river corridor visitation from unguided parties, fire suppression, limited wilderness stewardship funding and staffing, invasives/noxious weeds, and degradation of some cultural resources due to lack of deferred maintenance.

- Do these specific outfitting and guiding activities contribute to a downward trend in overall wilderness character?

The issues noted as threats to wilderness character do not appear to have direct connections to permitted outfitting and guiding activities. Unguided parties on the South Fork River appear to have increased and may pose a threat to wilderness character. Guided river trips and drop float services have been capped for some time and are to remain capped overall in the proposed action. Permit administrators can take actions to reallocate permitted service days away from the river use, but this will not address the more direct threat of increasing visitation by unguided visitors which remains unlimited at this time. That potential action is beyond the scope of this proposed action; planning for Comprehensive River Management Plan for the 3 Forks of the Flathead will have the ability to address this concern.

In anticipation of the 5-year trend assessment beginning in 2026, the wilderness character monitoring measures that could hypothetically connect to outfitter and guide activities are noted below. However, the degree to which a changing trend (if there is one) for these measures is directly tied to outfitter and guide activities authorized in this iteration of the permits as opposed to overall impacts from all visitation or other biophysical factors beyond the ability for wilderness managers to manage for would need to be considered.

- Acres of non-indigenous plant species (Natural quality)
- Index of non-indigenous aquatic animal species (Natural quality)
- Index of encounters (Solitude or Primitive and Unconfined Recreation quality)

- Index of recreation sites with primary use areas (Solitude or Primitive and Unconfined Recreation quality)
- Number of authorized constructed recreation features (Solitude or Primitive and Unconfined Recreation quality)
- Would an increase in outfitting and guiding enhance or protect wilderness character or meet needs identified by the agency?

The proposed action to reauthorize the existing outfitter and guide permits and the associated priority use allocation systems and currently authorized assigned sites as established in the current permits are not being considered for any increases. The following categorical exclusion is anticipated to be used to reauthorize these permits: *36 CFR 220.6(d) (11): Issuance of a new special use authorization to replace an existing or expired special use authorization, when such issuance is to account only for administrative changes, such as a change in ownership of authorized improvements or expiration of the current authorization, and where there are no changes to the authorized facilities or increases in the scope or magnitude of authorized activities.* This category precludes increases in scope or magnitude of authorized activities.

Permit administrators will use opportunities to protect wilderness character when administering permits. For example, when service days are considered for allocation, consistent with Forest Service Handbook 2709.14, permit administrators can consider methods to protect and/or improve wilderness character through distribution of service day allocations. An additional example could include allocating service days for trips which most clearly provide wilderness education through interpersonal connections for guests to wilderness character. Another example could be redistribution of service days away from corridors which appear headed towards excessive visitation.

Additionally, reauthorizing the permits will help preserve some aspects of the BMWC character, including the quality of Primitive Recreation and the Other Features of Value, to which outfitters are integral. And the outfitters will help visitors access, understand, and appreciate the BMWC character, which ideally engenders wilderness stewardship across a broader constituency.

- Why not consider less permitted outfitted use?

The proposed action is to reauthorize the existing outfitter and guide permits and the associated priority use allocation systems and currently authorized assigned sites as established in the current permits; no decrease in use is proposed. There is healthy demand for outfitter and guide services in the BMWC, and the current outfitters are capable of adapting their authorized activities to meet the needs of wilderness visitors. Major events impacting cultural/societal trends requiring adaption in the past have included changes in wilderness visitor trends from 9/11, the recession of the 2008-2010, and COVID19

pandemic impacts occurring across several years. BMWC outfitters have adapted to biophysical-environmental changes, like the effects of wildfire and changes to hunting and fishing regulations (creation of the Muzzloader Heritage Hunt and additional restrictions on Bull Trout fishing regulations), to which they strive to offer revised/reframed services to meet the needs of wilderness visitors. The Forest Service's policy regarding periodic reallocation (FSH 2709.14) gives permit administrators adaptive management tools to manage use in a holistic way. Hence, permit administrators complete 5-year reviews of service day allocations based on changes relating to resource areas and categories of use. Another example is the removal of administratively assigned sites that have been persistently unused. Last, as indicated in the questions answered above, it is determined that reauthorizing these permits will not directly lead to a degradation of wilderness character.

Conclusion: The proposed action to reauthorize the existing outfitter and guide permits, including the associated priority use allocation systems which accounts for a total of 30,000 currently allocated service days and currently authorized assigned sites as established in the current permits is the extent necessary for outfitting and guiding services in the BMWC. This proposed action is necessary to help segments of the public use and enjoy wilderness areas for recreational and other purposes. Wilderness character monitoring is in place and no known negative trends are associated with current outfitter and guide activities; future monitoring will be evaluated to determine if outfitter and guide activities have a specific negative effect; a framework is in place for permit administrators to protect wilderness character through permit administration.