

30 W. 200 S.  
Driggs, ID 83422

May 27, 1991

Gray Reynolds, Regional Forester  
Intermountain Region  
Forest Service, U.S.D.A.  
Federal Building  
324 25th Street  
Ogden, Utah 84401

Dear Gray:

On July 23, 1990, Acting Regional Forester Robert C. Joslin signed a Special Order prohibiting the use of salt to attract game animals within wildernesses in the Intermountain Region. On July 27, 1990, Brian Stout sent letters to outfitters and others that discussed the salting issue and the Special Order. His letter stated that permits would be amended to include mandatory prohibition clauses by October 1, 1990. On April 14, 1991, I wrote to Brian and asked what enforcement action had been taken and what was planned for the future. I also requested copies of outfitter special use permits that had been amended. A copy of my April 14 letter was sent to you.

Since I received no reply, I telephoned Brian on May 23 and asked why no reply. Brian denied seeing my letter. He did, however, state that no outfitter special use permits had been amended and no other enforcement action was taken. He stated that since the Chief discussed salting with Harold and Don Turner in March of this year, he does not plan to amend any outfitter permits. Brian stated that a decision to amend the outfitter special use permits would be appealable. He further stated that in his view, the salting (baiting) is still a nonissue.

To my knowledge, the July 23 Special Order is still in effect. Is that true? If the Special Order is still effective, does a Forest Supervisor have discretion to pick and choose which orders issued by the Regional Forester to enforce. More importantly, how is the public to know if special orders and other requirements (Grizzly Bear special orders for example) are being enforced? If outfitters are allowed to ignore special orders, can the general public also choose which orders to ignore? If not, that is blatant discrimination.

Gray, I realize that you were not pleased with my previous observation that much lip service is given to wilderness management and little on the ground accomplishment on the Bridger-Teton, especially in the Teton Wilderness. This episode concerning the salting (baiting) issue is one prime example of

why I have reached the conclusion that the Forest Service is not properly managing the Teton Wilderness. Another example, outfitters are allowed to repeatedly violate the terms of their special use permits. To my knowledge, only one instance of enforcement action has been taken. That involved debris left in a fire circle during a summer pack trip. Furthermore, to my knowledge, no outfitter has been charged with other violations of permit clauses. In this instance, I am referring to the "no cache" clauses in existing outfitter permits. I know of no other group of permit holders that have the privilege of violating permit clauses with impunity. (If outfitter permits are amended to remove the "no cache" clauses, I can assure you a flurry of appeals will follow).

When a thoughtful look is given the management situation of the Teton Wilderness, it is abundantly clear that outfitters and their operations are given special treatment that is not available to the general public. Perpetuation of caches, immunity from permit violations, heavy and abusive uses are some of the special treatments allowed by wilderness managers. Those types of actions violate the principles and concepts of wilderness. All of the self back-patting and acclamations of good management cannot erase or overcome the evidence of improper and inadequate on-the-ground management. In my opinion, the time is long past for the Forest Service to put into practice those wilderness management skills it so proudly proclaims. It took more than six years of discussions with forest officers, many letters, and sometimes outright harassment to get the Forest Service to issue the salting special order. After all that effort, the Forest Supervisor now declines to take enforcement action. There can be little question why I am cynical regarding the Forest Service's role as wilderness managers.

I will look forward to a prompt clarification of policy regarding the July 23, 1990 Special Order. Will or will not the order be enforced? Will all special orders including the Grizzly Bear regulations be enforced? Will outfitter special use permits be amended to comply with the special order prior to the 1991 season? What about permits for summer use - will appropriate clauses be included in those permits?

Sincerely,

Don Hooper

cc: Brian Stout