



MT Fish, Wildlife & Parks  
Region 3 Headquarters  
1400 S 19th Avenue  
Bozeman, MT 59718

December 18, 2023

Lisa Timchak  
Beaverhead-Deerlodge National Forest  
420 Barrett Street  
Dillon, MT 59725

RE: Beaverhead-Deerlodge Outfitter and Guide Permits Proposal

Montana Fish, Wildlife & Parks (FWP) appreciates the opportunity to comment on the Beaverhead-Deerlodge National Forest's (BDNF) Outfitter and Guide Permits Proposal. In March of 2022, FWP submitted the attached comment letter. For the sake of brevity, FWP reiterates its concerns regarding the depth of analysis contained in the Environmental Assessment (EA) as it relates to impacts on Montana's fish and wildlife. FWP urges the Forest Service to incorporate and further analyze the issues raised in the Letter and stands ready to work with the BDNF to ensure comprehensive stewardship of Montana's cherished resources is maintained.

For further questions or concerns, please reach out to the following FWP personnel.

Adam Grove, Wildlife Biologist (406-266-3367, [adgrove@mt.gov](mailto:adgrove@mt.gov))  
Jim Olsen, Fisheries Biologist (406-533-8451, [jimolsen@mt.gov](mailto:jimolsen@mt.gov))  
Jesse Newby, Wildlife Biologist (406-683-9305, [jnewby@mt.gov](mailto:jnewby@mt.gov))  
Vanna Boccadori, Wildlife Biologist (406-494-2082, [vboccadori@mt.gov](mailto:vboccadori@mt.gov))  
Jen Smitham, Public Comment Coordinator (406-495-3262, [jsmitham@mt.gov](mailto:jsmitham@mt.gov))

Thank you again for the opportunity to comment.

Sincerely,



Warren Hansen

Region 3 Supervisor



MT Fish, Wildlife & Parks  
Region 3 Headquarters  
1400 S 19th Avenue  
Bozeman, MT 59718

March 17, 2022

Lisa Timchak  
Beaverhead-Deerlodge National Forest  
420 Barrett Street  
Dillon, MT 59725

**RE: Beaverhead-Deer Lodge Outfitter and Guide Permits Proposal**

Dear Lisa Timchak,

Montana Fish, Wildlife & Parks (FWP) appreciates the opportunity to comment on the Beaverhead-Deer Lodge Outfitter and Guide Permits Proposal. We offer the following comments.

The outdoors is an essential part of the Montana way of life attracting, sustaining, and retaining individuals, families, and businesses. Our heritage, culture, and tradition are closely tied to the outdoors and access to public lands. Developments that would inhibit or impact natural, historic, archaeological, cultural, or recreational resources are heavily scrutinized. An area proposed for expansion is located near Granite State Park, a ghost town with significant cultural and historic value that should be protected from increased use in this area.

The proposal to have one service-day pool with a maximum of 30,000 days available for management of permits is a large increase over the 13,207 service days in 2020. This large increase could have cumulative effects on wildlife, fisheries, habitat, and the public currently enjoying fish and wildlife resources on the Beaverhead-Deer Lodge National Forest. Justifications for new and expanded use should consider the potential impacts to wildlife in the context of their cumulative effects using the best information available. Montana's natural resources are experiencing new pressures from the rapid increase in population and use of wildlife habitat. Evaluation of the proposed increase in guide services would benefit from considering these new circumstances. We encourage Beaverhead-Deer Lodge National Forest to consult with local biologists and wildlife managers early in this process to inform decisions.

We understand that this number was derived by roughly doubling the existing condition figures as of 2019 to accommodate anticipated program needs for the next 20 years, or two cycles of priority 10-year permit management. We have concerns that this environmental analysis cannot adequately assess the impacts to fish and wildlife resources projected out 10-20 years from now, especially given changing climatic conditions, increased recreational use, and development that Montana has seen. We recommend that this proposal be for one 10-year term only.

We acknowledge that this proposal is designed in part to provide flexibility and efficiency for permit administrators without requiring additional analysis. However, the proposal states that distribution of the entire

amount of remaining service days in the pool will depend on district ranger and staff determinations of administrative capacity to manage permits, which fluctuates, as do resource conditions and recreation use. We ask that local input from FWP biologists be institutionalized as part of this process. The proposal also states that any request for expanded or new priority use permits "must still meet the screening criteria". We could not find this screening criteria in the NEPA documents and therefore could not review it. We suggest making this available for public review and comment as well.

#### **Summer Activities**

In the Pioneer Mountains there is a proposed increase in the number and extent of fishing trips, backpacking trips, horse pack trips, horseback day trips, and guided trail running during the summer. The proposed areas overlap with important maternal habitat and summer range for elk and mule deer. Disturbance of maternal deer and elk is of concern given the vulnerability of young and the nutritional demands of parturition and lactation. The project analysis points to the existence of closed motorized routes to mitigate this issue. However, this may not adequately mitigate the impacts of proposed backcountry guided activities; particularly given the increased pressure from general users that this landscape will likely see in the future.

Similarly, increased high elevation guided activity could have deleterious effect for species of particular management concern, such as mountain goats. Many of the proposed activities (including base camps, high altitude running trips, and overnight llama trips) occur in important mountain goat habitat. In 2020, concerns over mountain goat populations in the Pioneer Mountains led FWP biologists to make a 75% reduction in the number of hunting permits for this area. Existing requirements to minimize impacts on mountain goats may be inadequate given the cumulative effects of these and other activities. In addition, permitting guided overnight llama trips in areas frequented by mountain goats and bighorn sheep should receive additional scrutiny due to the potential for disease transfer.

#### **Winter Activities**

Winter activities such as backcountry skiing could displace mountain goats and wolverines. The analysis suggests that wolverines and mountain goats may be displaced by these activities, but that the effects will be short term. However, the ability of these high alpine species to adjust to these disturbances will depend on the intensity of disturbance and its extent on the landscape. The disturbance of female wolverines or mountain goats at varying levels of guided and unguided use should be considered.

The expansion of guided mountain lion hunting proposed in the Pioneer, Big Hole and Lemhi Tendoy landscapes could easily lead to conflicts with existing users over the limited opportunity available. Suitable winter mountain lion habitat is very limited in the Lemhi Tendoy landscape, which constrains the mountain lion population it can support. Currently this area has high quotas based on the limited interest hunters have shown for the area and the limited access during the winter. However, these quotas are currently being revised to reflect mountain lion carrying capacity and changes in mountain lion harvest pressure. Mountain lion outfitters would likely find themselves competing amongst each other and resident hound hunters for a very limited number of cats in the few areas that provide access to mountain lions. The Pioneer landscape offers better mountain lion habitat and access. However, portions of this area are already heavily used by hound hunters and harvest in the East Pioneers is prone to quota overruns, which risks creation of a population sink. We encourage Beaverhead-Deer Lodge National Forest to consult with local FWP biologists for information on mountain lion population indices and contemporary harvest pressures.

For further questions or concerns, please reach out to the following FWP personnel.

Elizabeth LaBroad, Parks & Recreation Planner II (phone 406-577-7892, email: [Betsey.labroad@mt.gov](mailto:Betsey.labroad@mt.gov))

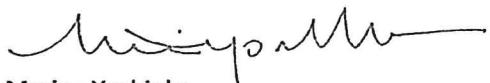
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Vanna Boccadori, Wildlife Biologist (phone 406-494-2082, email: [vboccadori@mt.gov](mailto:vboccadori@mt.gov))

Thank you again for the opportunity to comment.

Sincerely,



Marina Yoshioka

Region 3 Supervisor