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Organization: Elkhorn Working Group

Title: Chair

Comments: ????????December 18, 2023

Ms. Lisa Timchak, Forest Supervisor

Beaverhead-Deer Lodge National Forest

420 Barrett St

Dillon, MT 59725

Dear Ms. Timchak,

The following are the comments of the Elkhorn Working Group regarding the Outfitter and Guide Project. The Elkhorn Working Group (EWG) is a local citizen collaborative organization. It was established to advise federal and state agencies in the management of the Elkhorn Mountains, specifically the Elkhorn Wildlife Management Unit (EWMU), the only such entity in the entire National Forest System. The EWG was established in 2002 and sanctioned by both the Montana Fish and Wildlife Commission and the US Forest Service to address issues in the EWMU. It stands as one of the oldest and continually active collaborative groups in Montana. The Outfitter and Guide Project addresses issues forest-wide, including the B-D portion of the EWMU so our comments mostly pertain to that landscape. However, there are a couple of comments that do apply to the forest-wide scope of the project.

It became apparent that notification of the project through the various outlets that were utilized was limited, and many potential stakeholders received word of the project late and/or through second and third-hand sources. We recognize the numerous challenges involved publicizing these efforts but feel that given the importance and potential impacts of this project, the widest possible notification and participation is critical. Also, the comment period was set to run concurrent with the fall hunting season, that being one of (if not the) highest user periods on the forest, where people focus and set aside time specifically for that pursuit. As such, it did not leave as open a window for the general public to become involved with the process. This, in combination with the comment period overlapping into the holiday season, a time where people have other personal commitments that take priority over involvement in such things as public processes, make the timing of responding difficult and may, by default, eliminate important input to broaden the process. As such we request an additional 30-day extension to the comment period. We believe this would provide the broadest opportunities for public participation.

The cumulative effects of the project- socially, on wildlife and other resources on the forest and other public and private lands- is of concern to us. We are all aware of the increase in use by residents and non-residents alike of public lands. Many of us have seen the results of this change, both from the effects of more people relocating to Montana as well as tourist visitation. Crowding at Yellowstone and Glacier National Parks are but only two of the obvious results. The B-D's and the Elkhorn Landscape's proximity, easy access and significant use by recreationists from the nearby population centers of Bozeman, Butte and Helena and their potential effects is not addressed. Although the project document recognizes the general demographic increases, it does not provide data that presents a picture of what the combined use, both commercial and public, is across the forest. Thus, to evaluate the commercial use simply reflects only one part of a far more complex puzzle. An increase in commercial use- regardless of the time of year and degree- has the potential to cause or exacerbate existing problems of crowding, user conflict, resource damage and diminishing quality of user experiences. Much more information regarding other current uses currently taking place on the forest and adjacent lands is therefore needed to make an informed decision on commercial use.

The effects of recreation, particularly intense or concentrated activities during all seasons, on wildlife has been an issue that has been seriously addressed in professional literature for more than 10 years. There is a huge body of research that has shown disturbance and displacement is the inevitable result of recreational activities concentrated in areas during all seasons of the year. The project document, however, only addresses this in a cursory fashion. Nor, does refer to the scientific work that backs this up. This links with presenting a full picture of

all uses on the forest, degrees of concentration or places of potential concern and ultimately how the B-D plans to address the issues.

Finally, the B-D is currently in the process of embarking on a forest-wide travel management plan. The results of that effort have the potential to affect both commercial and public users of the forest for many years to come. It seems premature to be establishing a commercial use permit pool in the various landscapes prior to establishing the sideboards to how both commercial and public users can access the forest. It leaves open the question of commercial permits granted prior to the adoption of a travel plan being "grandfathered" with activities that are otherwise determined to be inappropriate for various landscapes. Or, having commercial activity as the compelling driver of travel management.

Speaking directly to the Elkhorn landscape, the B-D segment makes up only a portion- but an important one- of the overall Elkhorn Mountains and the EWMU. Big game hunting comprises a major recreational component of the EWMU (Hunting District 380) and does offer some data for overall seasonal use. In that district a special permit (HD 380-20) which is issued by drawing continues to be the most desirable permit in Montana. HD 380 consistently sees some of the highest hunter days in the state (as many as 25,000 annually, Montana Elk Management Plan, 2023.) There are also, however, numerous non-special (non-lottery drawn) hunting activities that occur in the EWMU for spike and cow elk as well as mule and whitetail deer and bear. All of those numbers, however, reflect the entirety of HD 380 (B-D, Helena-Lewis & Clark Forests and private lands) It would be very difficult to parse out the portion of the numbers ascribed to the B-D. In the Recreation Effects Analysis (page 33) harvest data and outfitter roles for hunting district 380 is portrayed. Again, these are data derived from the entire hunting district (over 330,000 acres) and only for the year 2022. Additionally, specific analysis (page 37) was aimed only at the special drawing portion of hunting in HD 380 (380-20) which varies in number annually, depending on aerial survey information, but represents only 100 available permits, again utilizing only hunting district-wide 2022 data. Hunting in the entirety of the Elkhorns is weather dependent and we have come to know that one season is not adequately representative of any overall trend or use of the landscape.

Another concern is the redistribution of wildlife- particularly elk- from public to private lands. With increased use of public lands, this has become a growing issue. It not only deprives the public of opportunities for viewing but also contributes to making wildlife inaccessible to management while placing a greater burden on private landowners for sustaining public wildlife on private land. Redistribution to private land was identified as a potential issue in research recently done in the Elkhorns on elk in beetle-killed forest habitats in the Elkhorns (Elkhorn Mountains Elk Project - 2019 MT FWP) This has been and remains a major concern of the Working Group as it was one of the issues that led to its initial organization. Over the years, and working closely with private landowners, we have been successful in addressing this issue. The cumulative effect of increased recreational activity, both commercial and public, will most certainly contribute to the potential for this reappearing as an issue in the EWMU.

The proposal does not indicate what kind of outfitting the additional 42 user permits in the B-D portion of the Elkhorns would be for. Although this might provide flexibility to accommodate a wide range of commercial activity, some of which is evolving, it leaves open their contribution to the cumulative effects.

The project document does not indicate that this is part of a wider cooperative management area coordinated with the Helena-Lewis and Clark Forest, the Bureau of Land Management, Fish Wildlife & Parks as well as NRSCS, Department of State Lands and the Montana Department of Military Affairs, not to mention numerous private landowners. As such, the activities of those various entities, including the B-D, impacts the overall management of the EWMU. There is no information in the project document that addresses the current commercial and public uses on adjacent BLM and Helena-Lewis & Clark Forest lands. There are outfitters permitted by the BLM as well as requests currently under consideration which potentially could impact the B-D portion of the EWMU. Additionally, adjacent to forest lands are private lands, many of which allow public access, some through the FWP Block Management Program. The overall "footprint" of public and commercial activities associated with the Elkhorn Landscape extend far south into the Boulder Valley, affecting and affected by the Boulder and Jefferson River Landscapes. In total, there are over 15 Block Management Areas in the general area from Boulder to Whitehall. Increased commercial activity has the potential to reduce public opportunity, complicate management, increase landowner conflict issues and possibly encourage landowners to shift from public to commercial recreational activities on their lands.

The connective role that the Elkhorn Landscape plays in both recreational assets as well as sustaining wildlife populations cannot be overstated. Increases in any recreational activities that might take place during all seasons will surely have an effect. Additional commercial activities would be a part of that impact. A broad, overall view and analysis, including all forms of recreation and commercial use on adjacent public and private lands needs to be considered in order to provide an adequate picture, from both social and natural resource perspectives, for a comprehensive, informed decision on the Outfitter Project.

Thank you for the opportunity to comment and we look forward to working with you further on this initiative.

Sincerely,

Joe Cohenour, Chair
Elkhorn Working Group