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Comments: Project Leader Carly Gibson March 14, 2020

c/o Carol Hatfield, Deputy Forest Supervisor

Beaverhead-Deerlodge National Forest

420 Barrett St.

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Re: My comments regarding the Beaverhead-Deerlodge Draft EA for Outfitter and Guides Expansion

Having spent a professional career in the Forest Service(mostly here in Region 1) I am well aware of the required NEPA process and the more recent internal bias toward inappropriately lumping activities to reduce the administrative process involved. This proposal and analysis seems to fit that mold.

So therefore I oppose this proposal and repeatedly find inadequate analysis/documentation as described in the accompanying draft EA. As such, this proposal and draft EA fails to comply with the legal requirements of NEPA, NFMA and ESA.

I am very familiar with the B-D. I worked temporarily on the Wisdom RD under Ranger Dick McElfresh in 1962. Since 1976 I have used the B-D extensively as a recreationist and have advocated for better management as a public land owner.

The proposed increase to a 30,000 service days fails to have been properly scoped because the prior scoping you are relying on in this analysis did not detail the full potential increase in use. Also it is inappropriate and deceiving to use just the existing permitted days and not the true commercial days actually currently used. Therefore the proposed 30,000 cap inappropriately disguises and under displays the actual increase potentially permitted by this proposal.

The analysis inappropriately and contrary to existing law lumps a wide range of potentially impactful commercial activities across the entire B-D landscapes under one proposal/analysis. Each proposed outfitter permit must be analyzed regarding site specific impacts and mitigations.

The analysis fails to recognize and document the relatively recent and possible future explosion in non-commercial recreational activity on the B-D, nor the projected logical growth in non-consumptive recreation's impacts on finite resources. An example of logical growth of a specific use, resident hunters are increasingly forced to use public lands because of the trends toward closing private lands to hunting.

The EA fails to acknowledge nor describe the potential conflicts with non commercial recreational users that may be using the same parts of a landscape for entirely different purposes. An honest evaluation of public sentiment by existing users would certainly oppose an increase in commercial recreational activities. There will be displacement of non commercial users that is not acknowledged nor detailed. This expectation has been born out in scoping comments.

Commercial permittees frequently market their services/opportunities to segment of the public that otherwise would not be using the B-D, therefore contributing to an substantial net increase in use. Therefore additional use created by the addition of commercial activities must be acknowledged, analyzed and mitigated where feasible.

Commercial users tend to prefer to use the same landscape features as the general non-commercial public. Lakes, streams, trails, wildlife concentrations, preferred dispersed camping terrain all concentrate recreationists and are attractive to commercial users. Conflicts are likely. High lakes are often already overused. This overlap of use is certainly evident during hunting seasons. Hunters rarely appreciate encountering commercial hunting. Non-commercial recreationists will no doubt encounter more commercial users under this proposal and that demands both acknowledgement as well as site specific scoping, indepth analysis, and mitigation, for each proposed commercial activity.

This proposal/analysis fails to be site specific. Therefore current users of a particular site may well find commercial activity within their favorite areas with no opportunity to comment until the commercial use is already permitted by the Forest. Court cases and laws have well established that any proposal and analysis must be

site specific. Proceeding without such site specific analysis will certainly fail in court.

This proposal fails to analyze the potential impacts to wildlife, including TES species such as lynx , wolverines or grizzly bears. Bear hunting most recently can now include using hounds which could easily encounter grizzly bears. Backcountry skiing using motorized assists could easily affect both wolverines , mountain goats or wintering ungulates. Lion hunting can easily and probably likely to encounter lynx and can adversely affect wintering ungulates. Failure to address these logical conflicts will fail any court challenge.

There is apparently no analysis of the impacts of each of the individual potential uses, nor the cumulative effect of such uses on other users as well as resources? How can this be considered to be a complete EA?

According to the 2009 Forest Plan, Standard 5 requires both to the administrative capacity to increased outfitter use as well as a Forest recreation capacity analysis. This EA Analysis does not adequately acknowledge that current recreational staffing cannot fully administer the existing commercial and recreational use demands. As example, the Forest has failed to complete a Travel Management Plan while most if not all other R1 Forests have completed one. The Forest uses the money/personnel excuse as rationale for not pursuing travel management but this EA seems willing to add substantially more permitted commercial uses having more impacts on the Forest workload The draft EA Analysis has not attempted to display how this potentially gross increase in recreational uses can be accommodated with existing personnel and existing funding. Proper permit administration requires adequate manpower. Has the Forest performed frequent on site visits of existing outfitting permits to ensure resources are protected?. Have existing outfitters been regularly inspected for invasive plants at their locations used by stock and checked for weed free hay/pellets? Checked for damage to vegetation, soils or water?

Nearly 3000 service days of outfitter use have been repeatedly authorized without any environmental analysis as required by 36 CFR 220. So until this analysis is complete and decision made these uses should be terminated immediately.

Recognized special area designations including wilderness study areas, recommended wilderness areas and inventoried roadless areas should be deleted from additional commercial use until a specific area specific management plan is developed for such areas.

It is readily apparent this proposal and analysis fails to comply with existing land use laws and national land use policy and thus should be withdrawn in favor of specific analysis and decisions on specific commercial use applications.

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