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Comments: After reading through the material provided for the Beaverhead-Deerlodge Forestwide Outfitter & Guide Permits EA I cannot support the proposed changes. While much time was spent on the development of the proposal in the last decade, that alone should not be rationale to continue this change across 93% of the BDNF. The research behind the actions is inadequate, and the actions are misguided. The NO ACTION choice is the correct choice. Public input should be taken before action occurs, unlike the permits that were already issued before the issuance and decision of this EA (Many new permits listed in Table 2). Because of this action, it is unclear if the BDNF has intention of listening to the general public rather than a special interest group on these important recreational use issues. I urge you to do so.

Service Days

This EA covers 30,000 service days for a number of different types of use. However, it is woefully brief on the impact of the nuances of each of those would-be permits. I understand that more details are in the permits themselves, but this seems like a bulk administrative move by BDNF to not have to give reasonable analysis to each of those proposed actions in the future. This short document also will be the public's last opportunity to voice concerns of these operations for two decades to come. The document does explain how staff doubled the existing service days to reach the 30,000 figure, but does not provide adequate justification for why this number was chosen. The resources of the forest may be much better off with 10,000, 20,000, or another arbitrary number of days in the permitting system, rather than the proposed amount. The forest plan itself recommends a much smaller increase rather than the proposed doubling, "Demand for both dispersed and developed recreation is expected to continue growing at 10% per decade (ch 2 p 6)". This 10% growth model is a much more reasonable approach to follow for commercial service day increases.

Recreation and Travel Plan Analysis

Table 1 incorrectly frames the Recreation Opportunities Goal in an over-simplistic manner. It states that unguided recreation opportunities are not limited. This is simply false. If a better analysis was taken it would have found that the number of users are going up across Montana and the BDNF. The forest should have better user numbers than a basic survey every 5 years if a 20 year decision is to be made on commercial recreation. There's a reality to the situation that there are a set number of roads and trails, peaks and valleys, streams and lakes. When a commercial group occupies a location, that is one less place for a non-guided user to occupy. Conflict between commercial and non-commercial users is real, whether this document admits to it or not. Many of these conflicts can be described into the 4 categories as described by University of Montana Wilderness Connect (<https://wilderness.net/learn-about-wilderness/threats/overuse.php>) such as differences in activity styles, dependency upon locations due to the resource specificity, contrasting modes of experience, and lifestyle tolerances that are at odds with one another. This plan would place more recreational users in the same footprint leading to problems in each one of those categories.

Backcountry Skiing

Recreational pressure is a real thing on public lands across the west, and the BDNF. Backcountry skiing opportunities on the BDNF are even more rare. They require the combination of quality and safe snow, skiable terrain, and user access. Those users without over the snow vehicles face an even greater shortage of these areas. Two of those few backcountry skiing opportunities in the Pioneer Mountains for human-powered access are identified within this plan to have commercial operations placed adjacent to them. Non-guided people will face great competition from commercial users for this small amount of snow. It will push local residents out of these areas as the user experience and snow quality will both be diminished greatly. The skiable runs in those zones are small, and it wouldn't take much before they are tracked out. The snowfall total in those areas is not great enough to refresh the snowpack for new users to have a quality experiences with the proposed commercial

operations.

The proposal also wants to open up most of the SW face of the Tobacco Roots to even more commercial use. Common people cannot afford to pay the fees of these facilities. The Bell Lake Yurt has a nightly fee of \$360 and many groups must pay more fees on top of that. Similar to the situation in the Pioneers, the skiable sections in the Tobacco Roots are much more defined than the total area of the proposed permit area. There is already pressure from skiers and motorized users for these zones. Please don't further complicate this by adding in more pressure from those with an economic advantage.

Additional clarification should be given for compliance of Forest Plan Recreation and Travel Management Standard 6: New recreation resorts or residence tracts will not be permitted, nor will permits be issued for unoccupied tracts or lots". Are these constructed yurts not overnight residences that would fall into this category specifically regulated? This seems like a potential violation of that standard.

Backpacking

Existing backpacking permits already cover a large portion of the forest. Additional permits in the Pioneer, Tobacco Root, and Snowcrest Mountains, including Recommended Wilderness Management Areas, will degrade non-guided user experiences. The lakes in the BDNF are often the destination for groups. These areas are very small and users often have competition/conflict for existing campsites. The creation of new sites will occur from the proposed action. Does the forest have data on current user backpacking experiences to note how things may change with the proposed action? What is the forest using as a capacity limit or other metrics to prevent the degradation of non-guided user experiences and other forest resources? The forest plan says, "Most of the BDNF continues to offer uncrowded motorized and nonmotorized backcountry opportunities". How is the forest monitoring this and at what point would they consider an area 'crowded'?

The forest plan also cites (ch 4, pg 216) for the Torrey Mountain RWMA, that it is to be "managed to protect wilderness characteristics and to provide non-motorized recreation with high levels of challenge and solitude".

Outfitting lessens those challenges for guided clients and removes that solitude for non-guided users. The wilderness characteristics will be degraded. This same principle would apply for other potential special use permits including guided running trips, ski yurts, commercial stock use, etc.

This same principle applies in the forest plan for the Snowcrest Mountain RWMA that is in conflict with yet another new backpacking SUP. As stated on ch 4, p 153, "This area is managed to protect wilderness characteristics and provide non-motorized recreation with a high level of challenge and solitude". It goes on to say that Visitors may encounter "Quiet natural landscapes". Additional outfitting of backpacking on top of the current outfitting that occurs there is against the framework of the forest plan for this management area. Outfitting does not provide a high level of challenge and solitude.

Assessment of Need for Outfitted Services and Resource Capacity Analysis

The continued inclusion of the survey of outfitters and sporting goods stores employees is still not close to the best method to measure the actual use and need of these services. Its inadequacies are great enough that it doesn't support Recreational Standard 5. First, the surveys have a very low sample size. Secondly, and very important, is to note the obvious conflict of interest from this group to sell goods and services relating to the BDNF. A broader spectrum of users would be much better at obtaining a true sense of public perception of recreational use and resource conditions on the forest. Public comment for the previous scoping document and the current EA proposal are not equivalent to this guiding survey document's bias.

The interviews of USFS recreation personnel were very interesting. However, the answers staff provided seemed incomplete. Often the answers were anecdotes of places here and there where they have noticed an issue. The methodology of the survey is not comprehensive enough to have staff speak to the greater issues that may occur at numerous locations across the forest. How seriously did the staff take the survey? Did the staff consider the forest as a whole, or simply respond with a couple sentences before moving on to the next question? Like the survey participants from commercial operations, the USFS recreation staff also are small in numbers resulting in a too small sample size to be meaningful.

Several of the proposed outfitting and guide services are in relation to hunting. This activity is significant on the BDNF for many months each year, affecting both hunters and non-hunting users. I find it surprising that this

proposal does not include data from Montana Fish, Wildlife, & Parks. MTFWP has decades worth of qualitative and quantitative information concerning hunting user experiences on BDNF and adjacent lands, why not incorporate it to see if these commercial activities are in the best interests of both the users and resources? This document admits that carrying capacity is a very difficult concept to place a numerical value on, yet it does this very thing by the allocation of a significant increase in Outfitter and Guide Service Days. The document lacks a clear methodology for service day determination within any area. "Numerical capacities are difficult to pinpoint and have been largely unsuccessful in resolving issues that appear to be related to capacity, but really may be more about proper site design, zoning of uses, and user etiquette. (page 14" If this statement is true, what are USFS staff going to do to ensure proper site design, zoning use of uses and user etiquette? This need to be addressed prior to the project implementation. Thus, until a plan to address these issues and an adequate explanation of how it reached the increase in service days is provided, service days should remain at current levels.

USFS lacks personnel to administer permits, monitor resource use and degradation, and maintain recreation infrastructure. As stated within the proposal, "it is preferable not for BDNF managers to expend limited resources on determining numerical capacities at this time; rather to apply professional knowledge and skills in the proper utilization, design and maintenance of facilities and trails; hardening, rehabilitating, relocating, or rest-rotating dispersed sites and outfitter camps (page 15)" Numerous similar answers are listed in response to question 16 on page 93 in relation to managing permits. The document does not address how the forest would take on these additional responsibilities of permits alone, let alone the significant amount of infrastructure to handle increased visitation. Budgets to staff trail crews are extremely limited. When was the last time that the BDNF trail crews were at full capacity? Instead the document talks about partnerships with the outfitters to get things done. Can the forest provide examples of outfitters completing significant infrastructure projects benefiting the general public? An analysis of recreational infrastructure and desired camp locations should be included for each area included within the proposed project - this EA lacks so much nuance necessary to make quality decisions concerning these permits.

If the proposal were to be approved, how would staff already at capacity take on the additional workload to monitor its impacts, especially during non-business hours when recreational use is highest? The document already highlights one survey response: "Potential degradation in the Anaconda Pintler wilderness near lakes despite restrictions already in place; lakes are an attractant and getting hit with greater impact; outfitter camps causing degradation in wilderness areas in summer and fall. (page 65)" Law Enforcement Officers are limited on the forest. Rarely, do these staff or other USFS staff have the capacity to leave their vehicles to truly assess what users are doing away from motorized routes. It truly makes me question the accuracy of the survey responses noted above. Do not increase service days until USFS can monitor the impacts of the proposed changes.

Soils Analysis

The staff member correctly identified compaction and surface erosion as two main problems that will occur with the proposed action. However, following this, they quickly minimized this issue. The BDNF itself is large, but the use is largely in a very concentrated portion of that area and will be the case with this proposed action. The noted 14 new camps will have the likely potential to be compacted at least 15% and have more than 15% of their soil surface disturbed. An increase in other commercial livestock and guided backpacking use will lead to many more than those 14 campsites across the forest. The cited campsite number seems to be lacking those considerations. Numerous different soil taxa and their associated soil surface textures occur across the BDNF. Why is there no differentiation in the analysis for these sites even though their erosivity and erodibility differs at each one? Where is the data showing that the existing outfitter camps are within compliance of USFS Region 1 Soil Quality standards before issuing a greater number of permits? Has any data collection occurred at these locations? Perhaps something akin to General Tech Report INT-259 and other newer accepted soil measurement protocols should be used for interim permits to ensure that they meet the R1 standards?

The soil productivity of soils within many of the low-nutrient parent materials within the Pioneer, Big Hole, and Tobacco Root Mountains are very low and especially susceptible to loss of thin mineral and organic surface horizons, leaving only the less productive subsoil remaining. After this loss, restoration and revegetation efforts are very difficult and must occur over longer timeframes. These soils must maintain vegetation cover to prevent

soil sheet and rill erosion loss. Soil development within the frigid and cryic temperature regimes which describe a majority of the BDNF are naturally slow. Therefore, if and when soil degradation and loss occurs, it will often take decades and/or centuries before those areas are restored.

Simply stating that LNT principles should be followed doesn't mean that they are. Even in the best of times and the most courteous of outfitted visitors, detrimental effects will occur. Thus, BDNF should not actively try to increase visitor ship.

Overall, I encourage BDNF staff to take a cautious and measured approach not currently seen within this proposal. Without that, our forest resources will be degraded by this dramatic increase in use.

Thank you for your consideration.