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Comments: After reviewing the partially updated materials for the Outfitter and Guide Project/Revised Draft Environmental Assessment I beg you to select the No Action Alternative. The potential alternative actions listed were far too quickly, and without merit, dismissed in search of trying to push through this overreaching administration action. By passing this broad proposal the public will be kept out of being able to incrementally provide input on numerous individual permits on the BDNF over a great spatial and temporal scale. Thirty-three thousand, four hundred, sixteen service days! This is an amount even higher than was proposed initially. But if we follow the words of the BDNF -- don't worry, you'll never - even - know - that - they - were - there. What craziness.

Backcountry Skiing (page 26)
It is interesting that the criteria specifically has language to protect commercial users from dealing with new commercial ski operators within particular areas, but doesn't adhere to those levels of support for current non-commercial users having to put up with new user conflicts. This alone is telling in what interests and values that are being upheld in this proposed action. An additional section explicitly prohibiting new commercial operators from already well used zones would benefit the public through limiting user conflicts in the years to come.

The modeling exercise trying to estimate backcountry ski areas across the forest is interesting, certainly creative, but it doesn't follow actual use patterns and available skiing opportunities. Based on these metrics, the BDNF has over 250,000 acres of backcountry skiing! Is this the best and most available ski area in America? The computer modeling does not consider slopes that are too great to ski, areas that are consistently blown free or to marginal coverage, access that may be limited due to down trees and other rough surface cover and winter road conditions, seasonally thin snowpack, unsafe snowpack during much of the ski season, unsafe landforms and other obstacles, limited distances that one can cover during day-use or even multi-day use, and other real impacts to the average (or even advanced) skier. All of these factors mean that in real life the 250,000 acre value is a gross over estimation.

In reality, people tend to visit very small zones next to a handful of access points. The conditions that drive this use are much more specific than the creative endeavor done at a USFS staff person's desk. We will see this play out in where the commercial enterprises seek to get a permit. Those areas will leave out a lot of the false ski zones that are claimed in this document because they don't really occur. Thus, the user impacts from commercial use are going to be much greater than claimed by the 'Increase Factor' column on Page 26. Timing of use also is not balanced across the season. Crowding tends to happen on very specific days following the intersection of quality and safety of snow conditions - it is not evenly dispersed across the full winter season.

Conflict between user groups is also compounded by existing and the probably increase of future motorized use. For example, the described 62,354 acres of backcountry skiing in the Gravelly's has an extensive amount of motorized use. Snowmobiling dominates much of the winter recreational use across the range. The skiing user experience is already compromised by other users there and few will tend to head to those areas to ski. It can be unsafe to ski and those seeking quiet recreation will tend to head elsewhere, furthering the crowding of non-motorized users at a handful of spots. This experience of conflict can be seen in all of the landscapes identified for commercial ski expansion.

Another current example of commercial use pushing out non-commercial users is the existing Bell Lake Yurt from that section of the Tobacco Roots. The new potential commercial use will further push non-commercial users to less desirable zones in that and other mountain ranges. New commercial permits will naturally seek the best terrain for skiing to benefit their own profit. Your math is false. Crowding and competition is real despite the

report's rhetoric. A necessary addition to this assessment would be to survey users about their ski use patterns around these operations and other conflicts to better place guardrails protecting non-commercial users across the forest.
People looking to backcountry ski on the BDNF without access to a snowmobile have only a couple of spots to go. Adding a yurt or other lodging at those places will essentially take away their opportunity!

One potential avenue for cooperation in the future for backcountry skiing would be through better forest management. Active fire and mechanical treatments would improve timber stand quality, wildlife habitat, grazing and ski opportunities! This could occur in most, if not all, of the different mountain ranges within the BDNF. Crowed stand density and an every increasing number downed, diseased trees hinder travel, especially during the winter. A comprehensive action like this would actually increase recreational opportunities for backcountry skiing AND many other diverse interests. Instead, the plan given here would only put more people into the same footprint. I can imagine timber cuts being done in a healthy way for the ecosystem that also allows wonderful and safe tree skiing. We can do better for all of us that live and spend time on the BDNF. Let's get creative rather than giving into the greed of commercial interest groups.

Crowding (Page 17)
Similar to other metrics, the computer exercise to determine spatial extent of acres of concentrated use is a falsehood. This methodology overestimates these zones by many magnitudes aiding the USFS objective to try and silence voices that speak up for solitude. Real on the ground use is very narrowly occurring along corridors and specific destinations. It is almost if the document was claiming that outfitters wanted to take their clients into the middle of a lodgepole pine side slope of a random peak and that you'd only see a fraction of a person along any single day - the rest hiding behind a tree. Whereas in truth during the peak season trails, creeks, lakes, and peaks will have larger groups of use, while the nearby areas (perhaps more mundane in the eyes of many) will see little use. Real crowding will indeed occur at these more highly prized features. Thus, the statement "Proposed Action would result in an almost negligible increase in service days per acre in either the summer or winter season of use" is false. If we take a look at the Pioneer Landscape, the document claims that the concentrated use occurs over 286,744 acres. A more realistic value is a but a few percent of this total, maybe 5% of that total. (yes, this figure was made up, but isn't any more inaccurate than the USFS provided total) Therefore, the concentrated use statistics would need to be amplified by 20 times those listed in the charts. Please provide the public with accurate statistics if that is to be the rationale for a large action such as this.

The methodology continues to be false when looking at the categorical likelihood chart on page 19. By using the same incorrect statistics for concentrated use acres by each landscape the likelihood categorization is also wrong. Continuing looking at the example of this in the Pioneer Landscape the rating given is 'low'. Go to any lake in the range during the summer now and you are more likely to encounter other groups than in the past. At some of these locations the increase crowding has become much more common throughout the entire year. Unless commercial use will be prohibited from those existing higher use zones for each permit to be allotted in the coming decades this entire section if a fiction. Even when not observing other active users, the signs of increased use are there through new campsites, social trails, trash, less abundance of wildlife encounters, and so forth. The changes occurring on the landscape are real and shouldn't be compounded by additional commercial use without a clear, detailed assessment which this document is not.

Within this same section some areas were indeed labeled with high likelihood of displacement and/or crowding. I may have missed it, but I don't see a good, clear plan of how the BDNF will mitigate them. As in, if additional commercial use is going to cause these negative issues for the public, how is the forest going to limit them? Or, in even clear language, how the forest staff will not issue permits in those areas at all. It seems odd to say that there will be problems, but then to rush ahead and do it anyways. Maybe I'm misunderstanding, but a clear framework should be in place before the actions are approved, but post at the individual permit applications, By then, the public has already lost their voice to speak up for our resources.

Soils Effects Analysis

The examples provided here seem vaguely described and potentially cherry picked out of many degraded camps and use areas across the forest. Staff even may have taken incomplete notes because the soil was 'difficult to dig in'. Where is the full report for the public? Seeing complete soil pedon descriptions and additional documentation from adjacent non-use zones would be better to fully assess soil loss over the years. Sheet erosion from surface layers can be hard to discern and could have readily been missed in what seems like a quick look around at the only 2(!) camps assessed in 2022. I suspect that the soils around these sites have significantly deeper epipedons vs those at the commercial use zone. Therefore, most camps would have degraded soils that comprise greater than 15% detrimental conditions and not meet Soils Standard 1.

Using the soil survey as was done provides a good general idea of what one may find at an induvial site. However, those soil series are not specific enough to be a basis of comparison for erosion assessments by USFS staff. Soil testing needs to occur before, during, and after commercial use to continually monitor real on the ground conditions. Until this happens on existing permit sites the public won't have a clear idea that soil standards are indeed being met.

In this same realm data from a penetrometer, soil hardness or moist consistence, and soil bulk density would provide a more complete picture of soil compaction vs a visual inspection of soil structure alone. Where are these supporting data to tell the public that soil standards are being met?

Also to note, since the forest will apparently push for existing campsites to be utilized for new commercial permits to reduce impacts (something in itself which seems reasonable), that in actuality will be one more existing site not available for others to use, therefore pushing another group to create a new campsite. Everything is connected! Thus, the cumulative impact of soil and vegetation loss will still happen through crowding with additional commercial use, even if indirectly.

Conclusion

If the BDNF would have provided an alternative action to this in which they incrementally increased commercial use and ensure that were to complete frequent monitoring assessments and input opportunities to the public I would have supported it. I can get behind an evolving forest management proposal in these evolving times across the American West - simple as that. However, the carte blanche ask of trust in this document is too much - it's frankly absurd. Actions such as this keep the public from being able to provide management feedback in areas that we frequently see much more than the revolving door of BDNF staff that are supposed to be their stewards. Do better.