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Comments: Montana Wild Sheep Foundation response to Beaverhead-Deer Lodge National Forest Outfitter and Guide proposal.

Please accept these comments by the Montana Wild Sheep Foundation (MTWSF) regarding the Beaverhead-Deer Lodge National Forest Outfitter & Guide proposal.

The Montana Wild Sheep Foundation works to conserve bighorn sheep populations and their habitat, advocate for sound management, and work with our partners in state and federal agencies, Montana's hunting and fishing organizations and outfitting community on behalf of bighorn sheep. We are a 700- member organization (and growing) with a history of working successfully across constituencies.

The Beaverhead-Deer Lodge National Forest provides habitat for at least ten bighorn sheep herds of interest to our members. The herds and their associated FWP Hunting Districts are Rock Creek (HD 210 and 216), Anaconda/South Flints (214), the Skalkaho (HD 261), Greenhorns (HD 330), Highlands (HD 340), Garrison, Tendoy, and portions of the Hilgards (HD 302) and Spanish Peaks (HD 301)

As written, the proposal does not provide adequate information to evaluate the impact on bighorn sheep and their habitat. The proposal does not provide enough detail on how, where and why additional guide days will be distributed. What proportion of days will be for hunting, for fishing, for backpacking, for skiing, for horseback riding, for motorized use? Where will those days be used? Without that level of detail, we can only offer overarching comments for your consideration.

Bighorn habitat and populations:

Winter range, lambing habitat and summer rearing habitat are all limiting factors for bighorn populations. These habitats could be adversely affected by additional disturbance resulting from increased guide days (weed infestations, increased motorized and non-motorized use, direct disturbance and displacement of sheep during vulnerable periods, etc.). We note that guide days in Upper Clark Fork will have the second greatest proportionate increase in use and this landscape is home to four vulnerable bighorn populations.

Of particular concern is the potential impact of summer recreation on bighorn lambs and ewes in high mountain lake basins as well as the potential for disease transmission from domestic pack goats. Lush high elevation meadows and lakes provide high quality forage to lactating ewes and their lambs. Summer recreational use by guides and the public writ large are focused in these areas. Increased numbers of guided trips could displace ewes from those habitats when they need them most. Pack goats have the potential to infect wild sheep with pathogens which may result in bighorn population declines.

Hunter Experience:

The opportunity to hunt bighorn is rare, coveted and more often than not a once in a lifetime experience. Our members value that experience for the opportunity it provides to hunt in wild landscapes with a minimum of interaction with other recreationists or competition with other hunters. Putting more hunters on the landscape could diminish that experience. In designated Wilderness directing additional recreation to roadless lands seems contrary to the intent of the Wilderness management.

Public and Agency Coordination:

Public knowledge of this proposal was limited prior to its release and constituents have not had adequate time to

evaluate a proposal which prescribes hunter/guide days for up to 20 years into the future. To what degree has the FS coordinated with FWP and consulted with FWS on this proposal? The EA does not make that clear. Has it been what the public expects, and agencies require for an action of this magnitude?

Conclusion:

It is MTWSFs observation that the EA does not provide enough detail, or time for review or to analyze-with adequate rigor-the impacts of this proposed action on bighorn sheep, other wildlife, hunters or other recreationalists. We anticipate potential adverse impacts to bighorn sheep habitat, population persistence, hunter experience and public perception of the FS. In an era when we are all focused on working collaboratively, we request that the Beaverhead Deer Lodge National Forest select the no action alternative until additional information is provided on this proposal and diverse stakeholders including MTWSF are brought to the table regarding an action which may impact mountain ungulates and recreational users for years to come.

Thank you for your work for Montana's natural resources and commitment to their management.