

Data Submitted (UTC 11): 8/11/2025 7:56:57 PM

First name: Neil

Last name: Hymas

Organization:

Title:

Comments: The Assessment recognizes the deep connection of local communities to the Forest, including gathering activities (BTNF Supplemental Assessment Info, Social and Economic Condition Key Takeaways). It recognizes (page 208) that economic contributions from the Bridger-Teton contribute only a small portion of the total employment in the area, however the social and non-monetary benefits of forest resources are not captured quantitatively and are crucial to consider alongside the economic contributions.

Even though the importance of non commercial activities and future increasing demands with growing local populations is recognized, the Assessment fails to adequately address the impacts, conflicts, and opportunities associated with competing commercial and non commercial uses of the Forest. This is not in line with a responsible multiple use concept. The importance of noncommercial uses is under-represented in management decisions governing several commercial uses, including road and trail maintenance, mineral extraction, timber harvest, and grazing, but it is especially evident in the assessment of outfitted hunting uses.

1) As an example, the Assessment used the 2024 Survey of Preferences and Values (Question 10) to gauge acceptance of outfitting permits on the Forest. The question combined all outfitting (horseback rides, rafting, snowmobiling, hunting, other), and failed to recognize the very significant difference associated with hunting outfitting activities and their impact on the public.

-While most other outfitting activities rely on abundant federally managed resources on the Forest (snow, scenery, river water, photographic opportunities) hunting outfitting is in direct competition with the non-outfitted public for a limited, very competitive, and highly desired wildlife product.

-It has been the USFS practice to permit hunting outfitters to reduce competition and conflict between other outfitters by spacing of campsites and drop camps, but very little consideration has been given to a desire by a large number of public hunters to have quality back country hunting opportunities without being impacted by commercial hunting outfitters. This is obvious when viewing maps of permitted outfitter campsites on the Forest. In the Kemmerer District, there are between 24-35 resident and nonresident deer and elk hunters hunting without an outfitter for every 1 outfitted hunter, yet the limited backcountry has few drainages not affected by outfitting operations.

-Unlike most Forest products, big game and all wildlife, belong to the residents of Wyoming by state statute. The state recognizes this ownership by issuing a larger percentage of hunting licenses to residents. Most commercially outfitted hunters are nonresidents. USFS outfitting policies mainly guide land use and access, but have failed to recognize the importance of hunting to the non-outfitted hunters, especially the local residents that have a reasonable expectation to fair practices while competing for these resources.

2) Although outfitter permits do not provide "exclusive" use of an area, the location and terms of outfitter campsite permits varies significantly on the impact on other hunters. The Assessment does not address this issue. Some outfitter camps are located where the public has a reasonable ability to compete for access to the forest, such as near trailheads. Outfitter camps that are located in backcountry settings with topography limiting hunter dispersion, can have a dominating and negative impact on the quality of the opportunity for other hunters. While the non-outfitted hunter must pack everything in and out for his trip, the outfitter sets up a large camp, is exempt from the camping time limits, and gets to leave permanent corrals, tent frames, and outhouses. The camp at Lake Alice even gets their own cabin to cache supplies. This often leads to a feeling of entitlement by outfitters, and subsequent conflicts with the public.

3) The impacts to the Forest user from inconsistent and outdated Forest administration and policy have not been included in the Assessment. (Examples follow)

-The issuance of outfitter "spike" camps is a decision issued by a District Ranger that has a significant impact on other hunters and forest users, but there is no process for public input. Especially in areas like the southern BT Forest, where backcountry is limited, hunters planning a trip have no way of knowing that they will be impacted by a commercial hunting camp in their destination. Outfitter "spike camps" almost always negatively impact other hunters, and are sometimes a result of poor planning, or over-booking by an outfitter.

-Issuance of outfitter "spike camps" vary by Ranger District and employee. A change in personnel seems to change policy in some instances. Adjacent Districts do not administer the same policy.

-Outfitted "drop camps" are regulated to be a certain distance from other outfitters, but no policy provides the general public the same consideration.

-It does not appear that outfitter needs assessments and capacity analysis are completed when requested or needed by Districts.

-Some USFS policies, such as transferring hunting outfitter camps to new owners, artificially inflate the value of the new permitted business, essentially "selling" USFS campsites. This not only results in more small family owned outfitter business being acquired by larger operators and corporations, but does not give the USFS the opportunity to assess the need for changes to outfitter permits as the opportunity arises.

On other noncommercial use issues, local firewood and other wood product gatherers are recognized as important social values of the Forest. The Assessment does not adequately recognize how prioritization of commercial timber sales impacts the noncommercial firewood and wood product gatherers.

-As an example, some time ago a RAC committee identified an area between Big Park and Kelly as being important to local firewood gatherers, and agreed to a management recommendation to leave an area accessible to the public, but the USFS administrators sold the entire area to commercial loggers, and firewood gathering was prohibited. With increasing interest in commercial timber harvest, the Assessment does not adequately recognize this impact on local users.

On road and trail management, the Assessment recognizes the inadequate funding to maintain the roads and trails on the Forest in desirable conditions, and the increasing amounts of use on these roads and trails. Roads like the Upper Smiths Fork and LaBarge Creek roads are examples of inadequate road maintenance for the volume of traffic using these roads. Trail maintenance is lacking, especially in the years following fires and beetle infestations. Using outfitters to clear trails commonly results in trails in the vicinity of their camps being cleared, but does not address a uniform trail maintenance program.

The Assessment seems to adequately recognize this problem.