

Data Submitted (UTC 11): 12/18/2023 10:01:26 PM

First name: Karen

Last name: Myers

Organization:

Title:

Comments: I want to thank you for the opportunity to comment on the Beaverhead Deer Lodge National Forest. Outfitter and Guide Project Draft Environmental Assessment.

I urge you to adopt the " No Action" alternative.

Here are some of the reasons why.

Increasing the Outfitter Client Days almost three fold is hard to comprehend, especially when so much is unpredictable in the changing climate that is creating an unpredictable world. The environmental assessment that is nearly a decade old is clearly out of date.

If the assessment stands and the 30,000+ Outfitter Client Days are granted it will be very hard to rescind them. That could be a tragedy leaving landscapes in trouble. I urge the Beaverhead Deer Lodge National Forest to go slow and not to rely on old data.

The proposal is too broad. There are many different activities that the Outfitters/Guides engage in having different environmental impacts. The proposal acknowledges this but fails to specify the activity so it is impossible to asses the impact.

The report says currently the commercial use is 1.8% of the total use over the entire forest. It also states the in the Proposed Action that commercial use would only be 5% over all recreation use on the forest using the 2015 NYUM data. The report says based on these proportions "the lion's share of use is not commercial". That may be true but is a faulty reason for increasing commercial use in limited areas. The outfitters and guides are not spread over the whole forest. Usually they have chosen the best hunting spots or other places of scenic beauty with wildness or special rock formations or lakes and streams. The pressure on the landscape would definitely increase more than 5% in some drainages.

There is another misconception. When permitting a commercial Outfitters/Guide the Forest Service says it would try to chose sites that already have a fire ring which seems reasonable at first glance. This is not reasonable when one considers that the spot with a fire ring has been used many times over the years by the public, some who revisit it and tell their friends and relations how special it is for the solitude, beauty of place and the wildlife, large and small, animal, plant and rock formations. By giving the use of that fire ring to Outfitters/Guides the public would be pushed out.

Maintaining wilderness character in designated Wilderness, Wilderness Study Areas, and Recommended Wilderness should be mandated in the Environmental Assessment. It is not.

Its not that I object to Outfitters and Guides per say, many have a love of the land and help people experience what they couldn't otherwise. What I protest is the gross negligence in assessing the problem realistically.

I strongly urge you to adopt the "NO ACTION" alternative.