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Comments: While I do not disagree that an updated plan to address increased demand by outfitters and guides is necessary, increasing use 153% using a plan that lacks specificity as a strategy to make administering usage/allocating use days easier is inappropriate.

Admittedly your plan states that hunting is the number one form of outfitter/guide use days on the forest. Without allocating/capping a percentage of use days to certain activities it stands to reason that guided hunting will disproportionately continue to grow.

The need in your plan of action states that as the population in Montana continues to grow it will become more urbanized and that members of this public will most likely lack the skills or tools requisite to access portions of the forest and thus there will be an increased need for guides to provide them access. That is a speculative statement. This logic is perplexing, while there may be individuals that lack the skills or resources to access backcountry, improved access via the use of a guide may indeed increase access to some, but only for those that can afford to do so.

The 2015 Assessment of Need used to guide this proposal identifies current supply and demand as important measures to determine the potential impacts to users. Supply and demand has changed significantly in the last decade. The use of antiquated data to make long lasting, impactful decisions is inappropriate. There is no current measure of hunter pressure, hunter satisfaction, or congestion across the B-D. The 2015 Assessment of Need doesn't address the impacts of Covid-19 on recreational demands on the Forest. Impacts to wilderness areas are currently not adequately monitored. Stay limit exceedances are rampant in the Anaconda Pintler Wilderness. There is no guarantee or plan to address monitoring for compliance if Guide/Outfitter usage is increased.

Increased Guide/Outfitter use days need to increase on the Beaverhead Deerlodge. Access to the public is essential and important. Guides and outfitters provide services to aid in this, but without a clear procedure in place to establish priority for new permits, increased use days will see and disproportionate increase in use days go to hunting guides/outfitters. This will not benefit the public at large, but add to an increasingly pay to play hunting system here in Montana.

I ask that the USFS adopt Alternative 1: No Action until current data that addresses potential negative impacts to both the public and associated resources has been gathered. The potential to make long lasting decisions with poor data, anecdotal data, or admittedly no data is a huge risk.