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First name: Anonymous

Last name: Anonymous

Organization:

Title:

Comments: I oppose expanding the commercial use of the Beaverhead Deerlodge National Forest by 153% for multiple reasons and concerns. Here are those reasons and concerns. I have comprehensive and extensive experience working within this industry and within this National Forest. I'm a lifelong, passionate hunter and here are the reasons that I'm fed up with working as a guide in the BHDNLN.

The average guided hunter is middle aged, out of shape, from sea level and therefore incapable of hiking in the mountains at 8000+ feet elevation. So guides, knowing exactly where the best ridges, saddles and pinch points are, from decades of handed down outfitter knowledge, place hunters on these locations, make a fire and spend the week hoping for elk to step out of the timber. Boring as babysitting a grown man. It is also pretty standard for two clients to be placed with one guide and I think the Forest Service should mandate that each guide take only one hunter to prevent herd shooting, wounded elk or multiple elk being killed by one hunter. In addition to being generally unhealthy and unprepared for mountain hunting, the average client on these guided public land hunts has no sense of direction and will get themselves lost in the blink of an eye so I rarely let either of my two hunters out of sight-all three of us almost always hunted next to each other. Hunting over pressured elk where shot opportunities are very rare and fleeting, sets any hunter up for 'Buck fever'. When a herd of cows make the mistake of stepping out of the timber in front of two incompetent shooters (not hunters), on day 4 of a 5 day hunt, what usually happens is that one guy starts shooting before the other guy has a perfect rest. Then the second guy hurries up and starts shooting so he doesn't miss his chance to jerk the trigger (even though he doesn't have a good rest and the cows are moving). The hunters are so fixated on filling their tag that they don't hear the guide yelling at them to stop shooting. The result of this common scenario of two guys taking multiple shots at a herd of cows (which are indistinguishable from each other after the recoil of each hunters first shot) is a bunch of wounded and unrecoverable (because guided hunters can't hike to save their life) cow elk. We would warn all hunters of this scenario and how to prevent it from happening but the reality is that placing 2 incompetent hunters next to each other with only one guide sets up this scenario to play out on almost a weekly basis. One of the outfitters I worked for would even encourage hunters to keep hunting for another elk after wounding an elk. This is ambush hunting at its worst and repetitively punishes hungry elk looking for grass and rewards nocturnal elk hiding in the timber. It's one of the major reasons why the quality of hunting within many areas of the BHDNLN has become abysmal and one of the reasons why MT Fish Wildlife and Parks is having a difficult time managing elk herds in SW MT. Outfitters=intense ambush hunting=nocturnal elk. Compare the above style of ambush hunting with the way that the vast majority of DIY hunters hunt public land; which is to drive to the trailhead or camp at the trailhead, plan an 8-12 mile route and hike briefly through a variety of habitats working the wind, looking for fresh tracks to follow, never spending more time in one spot than it takes to eat lunch or glass a bedding area from above. Hunting this way you rarely shoot an elk in the same spot as last year (let alone yesterday or last week) and you don't spread a week's worth of human scent all over an elk's favorite living room. The depths of the backcountry should be elk sanctuaries available for hunting only to those most qualified to be there-not big fat guys from Ohio with \$ to spend on an outfitter!

In addition to requiring outfitters to place no more than one hunter per guide I also think it would be a good solution to allow guided hunters to only shoot brow tined bulls and not cows because it is far easier to identify the elk that the hunter took their first shot at when that elk has identifiable antlers.

In addition to the negative impacts of heavy outfitter hunting pressure here are some additional problems that I have with the commercial use of the BHDNLN by outfitters and why I am concerned by the proposal to increase this use by 153%:

- the mere presence of a large outfitter's camp usually discourages other Forest users from exploring the country immediately above the camp. The camp acts like its own gate keeper to the outfitter's favorite and easiest hunting spots. Being as many of these camps are located in historical camp locations that have been used by hunters for many decades (or millennia) leaves me thinking that the "gatekeeper" effect of an outfitter's camp is no accident.

-Outfitter camps seem to always be located too close to creeks. This is to make watering of stock and the cook tent easier but I imagine there is plenty of unintended runoff from horses, the latrine, wood stove ash etc. Plenty of stream bed erosion where stock are watered multiple times per day.

-over time high lined stock trample and suffocate the roots of the trees above them. These trees are usually very pretty old growth spruce and pine.

-Client's 'dude' horses were always shod without appropriate traction added to their shoes to prevent falls on steep icy trails. Dude horses that were shod (mules were usually barefoot and very sore footed) never had additional traction added to their shoes in the form of studs or ice pick nails and also never had snow pads. I imagine the outfitter's stock was shod like this to cut costs but it made the dude horses much less safe to ride on steep, icy trails and I personally witnessed a bad wreck when a slick-shod dude horse slipped off the icy trail and rolled over its rider-miraculously the client was unhurt.

-Trash burning. I have seen plenty of plastic trash burned while in commercial camps. I hate when people burn trash and plastic. It's especially irritating when it's the boss doing it on public land!

--By the end of the first week of rifle season the latrine was gross. The clients would never remember to urinate before sitting down so the ground underneath my feet, immediately in front of the latrine was a puddle of urine by the time I made my way to the outhouse each morning. The ground around camp would be frozen solid after November 1st making it a physically intensive chore to dig another latrine, move the outhouse and bury the old latrine (no 2nd latrine was ever preemptively dug when setting up camps in September or re-dug when the old latrine became too full during late season). Consequently by the end of each hunting season, the only latrine that had been dug, was overfilled with feces, TP and wet wipes. I don't think the latrine was ever adequately buried due to the ground being frozen rock solid and the latrine being filled to the brim. I recently heard through another person who works for this outfit that while helping them set up their camp early one fall he watched a woman who was trying to help out, accidentally step into the prior year's unburied latrine and sink up to her ankle in human feces-apparently it was extremely upsetting for this woman! I don't want to imagine what a 150% increase in latrine use in my favorite National Forest would look like. I think that it would be a very effective solution for the Forest Service to mandate that outfitters operating from a temporary camp on USFS land be required to pack into camp, large clean empty groovers (portable latrine) with each week's new clients (I'm surprised this isn't already mandated given the close proximity of most outfitters camps to riparian areas). When each group of clients leave camp, pack their groovers out and get new ones in with the next group of clients, just like all commercial river outfitters are required to provide for their clients. Also, in all my years working for the BHD LNF Outfitting industry I've only run into 1 Forest Service law enforcement officer intent on completing an inspection of a commercial camp. The inspection was surprisingly very brief, superficial, almost token-the FS LEO seemed to be on friendly terms with the boss too-seemed like a conflict of interest. This one inspection that I witnessed was made even more ineffective by nature of it taking place early in archery season-before the weather got nasty, the masses of rifle season clients showed up and left, exhaustion of employees set in and things got sloppy. The most effective inspections that forest service personnel can make will take place late rifle season when the weather is brutal and the outfitter and employees are exhausted! So the Forest Service definitely needs to exponentially ramp up inspections/law enforcement of outfitter camps for at least a few years before even considering a proposal like this-get rid of the bad apples first! Since a commercial outfitter operating on all of our public land must be held to the highest standards of forest use then they really need to have their camps, stock, equipment and staff thoroughly inspected on a surprise, weekly basis to make sure that they are meeting their professional obligations and staying compliant with the law. I have not seen this to be the case yet. I'm pretty sure the people I've worked for expect no more than two inspections over the course of the entire archery and rifle hunting seasons. Inspections of camps should also ramp up and become more frequent towards the end of rifle season (or the end of the outfitters period of permitted use) when cold weather and exhaustion tempt staff into cutting corners and brushing aside their responsibilities to the Forest, their clients and especially other users of the Forest.