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Organization:

Title:

Comments: I value quiet recreation, large landscape conservation, and wild lands and waters. I realize the value of a formally established pool of outfitter days, it appears to me the 150+% increase is excessive based on current demand and use. The proposed action to increase outfitter use is too broad and lacks specifics and therefore makes the impacts inscrutable, and the rationale provided for the proposed action is insufficient and appears anecdotal. It seems that before this project proceeds: Increased outfitter/guide use days are only considered in areas where all existing and available use days are currently being used, and specific recreational activities are clearly identified and communicated, and specific locations where these activities would be permitted are clearly identified and communicated, and specific dates where these activities would be permitted are clearly identified and communicated, and I asked and support that the USFS adopt Alternative 1: No Action.

All uses - especially commercial use - of our publicly owned lands and waters deserve careful analysis and a clear public process to identify, when, where, and what specifically is being allowed or proposed, to better evaluate the need and effects of increased use has on the landscape and inhabitants. Increase in days and demand for use should also consider the use and impacts of the many organizations and individuals who use this Beaverhead-Deerlodge National Forest for their education, backpacking, horse packing, geological trips, animal tracking and viewing, etc. and may offer a better understanding of living light on the land. It is an oxymoron for a permanent campsite or any long-term campsite to teach the benefits of "Leave no Trace."

In the June 2015 Assessment of Need for Outfitted Services and Resource Capacity Analysis Executive Summary, the USFS, citing data from the SUDS, mentions that "outfitters and guides are utilizing an average of 48% of their permitted days," with "every activity offered by outfitters and guides showing some unused permitted days."

So not even half of the permitted days are being utilized, and all forms of outfitting guiding appear to be overallocated use days in many landscapes of the B-D NF, yet - reportedly based on anecdotal requests for commercial use and nothing more and may only pertain to certain landscape/districts. - the USFS is proposing to increase permitted use days by 153 percent?

Creating an excessive pool of days is similar to creating a supply in excess of demand, with the monetary hope of "if we build, they will come," and further commercializes our public land. Commercialization on any broad scale reduces the experience for all who use and value our public lands. I realize that some of the outfitters whose primary business is guiding our streams would jump at the chance to amend their outfitter plans, to include day trips to lakes, but a needful and careful analysis should be done to determine the impacts of increased use on both the landscape and the fishery and other forest inhabitant and users. Such increased use increases the potential of conflicts between commercial and noncommercial users, and may promote an attitude of, 'This is mine, I'm paying for it, so leave.'

Thank you for the opportunity to comment, and again, I support Alternative 1, no action

Respectfully Submitted

Beverley McDougal

Member of WildMontana and Back Country Horsemen of Montana, and Beaverhead County resident