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Comments: I am opposed to the proposed increase in outfitter and guide permits on Beaverhead-Deerlodge National Forest. The problem is that all commercial use comes at a cost to private users, and these are the public's lands. History shows that, in other parts of the country, whenever overuse occurs, subsequent restrictions unfairly exclude the public and favor commercial permit holders. Floating the Colorado River through Grand Canyon National Park or the Middle Fork of the Salmon River in Idaho are prime examples. Even if restrictions to public use do not occur, the public's experience is degraded. For example, competition for untouched snow in the central Wasatch Range, Utah, is fierce, made more so by commercial helicopter skiing, commercial snowcat skiing, guided backcountry ski tours, and commercial avalanche schools. Beaverhead-Deerlodge National Forest will also eventually suffer from overuse, and expanding commercial activities will only speed this demise.

BDNF provides a report showing a need for the expansion of commercial activities written with the UM Institute for Tourism and Recreation Research. Of course they are going to conclude that expansion of commercial permits is necessary! They found that 84% of outfitters and sporting goods employees do not feel that crowding is an issue on BDNF. Talk about a conflict of interest! And this is indeed a very shortsighted view, with no eye to the future. They also state that all guided activities report unused permit days, with 52% overall going unused. This suggests there is not a "need"; it sounds instead like commercial operations and sporting goods retailers "need" to increase their profits (at public expense). And if you are really concerned about safety, surely there is a better way to promote it than to bring an army of babysitters into the forest.

Very little specific information is available on the BDNF website. For example, the scoping letter states that 118 days of snow cat skiing are proposed to be added somewhere on the Gravelly Landscape, but nothing is shown on any of the maps. The scale of this project and its potentially great impact on the public warrant a detailed EIS not just an EA.

I am particularly opposed to any increase in commercial motorized use of BDNF, including snowcat skiing, snowmobile and ATV tours, and snowmobile/ATV access to yurts and base camps. Motorized use is exponentially increasing anyway, and it degrades the non-motorized user's experience miles away. These quiet users include the archers, birdwatchers, mountain bikers, hikers, hunters, fishermen, rock climbers, and real backcountry skiers, whose numbers you say are rapidly increasing. It's already difficult for quiet users to escape the noise of motors, and adding more tours will only make it worse. I would think even the private ATVers and snowmobilers are detrimentally impacted by more commercial use. Groomed trails will deteriorate more rapidly, and more traffic will make travel more dangerous.

I'm not sure what the proposed "cattle drive" area covering the entire Gravelly Range means, but I do know that livestock there conflicts with grizzly bears, and the bears are always the losers. Perhaps grazing allotments should instead be permanently retired there.

Expanding guided fishing into the Tobacco Roots and Pioneers will adversely affect those members of the public seeking solitude and good fishing. Please prohibit this commercial use.

Increasing guide and outfitter permits on BDNF will only benefit a few: the commercial operators, the sporting goods retailers, and the rich who can afford to pay. But it will surely harm the general public, who are the owners of this land. It will certainly hurt wildlife. Please abandon this shortsighted proposal.