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First name: Michele

Last name: Dieterich

Organization:

Title:

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Thank you for the opportunity to comment. I live near the Beaverhead Deerlodge National Forest (BDNF) and enjoy its wild places. I am concerned about increasing outfitter permits and use days and allowing new uses without sufficient data on effects. The BDNF hosts vast roadless areas and wild places that wildlife desperately need in this time of changing climate and increasing human encroachment.

There should be strong limits on human interference in wildlife habitat. Allowing large groups of motorized and non-motorized recreationists by increasing permits and user days is not the way to conserve what habitat bears, lynx, rabbits, toads, wolverine, marten, elk, and have left.

First I think this proposal should be rescoped. The original proposal has changed greatly from the original scoping documents. This does not allow the public the time to take a good look at what is being proposed. This is a violation of NEPA. This is easily remedied by considering this the reopening of scoping, allowing more time for the public to be informed and to consider the proposal and make meaningful comment.

My experience in the past is that commercial use overrides private users and deprives them of the solitude and quiet a forest can provide. The Grand Canyon and even the Salmon Rivers have shown that as soon as outfitters acquire a stranglehold on permits, private users are left out in the cold of lotteries and hopes for a cancellation. As use increases and it will, the effects will be noted and change will be needed. But you cannot take back what you have already given. So private users will have limited access and Outfitters will benefit from this unwarranted expansion of use permits.

The activities proposed also are a bit over the top. Helicopter drops, running races in grizzly country, and extended snowmobile and backcountry skiing in grizzly habitat. Have the effects of snowcat skiing on grizzly denning even been considered?

One report provided by BDNF stated that 52% of permit days were left unused. This does not seem like a strong argument for increasing permit days. It also asked folks that would stand to profit if permit days were increased if they thought BDNF was overcrowded. This is like asking the fox if the hens are safe. It does not ask if permit days were doubled (current allowed days since 50% go unused) plus another 30% more with new permits would affect crowding in the area.

Speaking of the fox in charge of the henhouse. BDNF personnel should be conducting annual field inspections. Allowing outfitters to do their own inspections makes little sense. Without regular, consistent inspections by agency officials, there will be no true analysis of effects. This in conjunction with increasing guaranteed priority use days will certainly take its toll on resources and wildlife. Priority use days should be reduced not increased in this proposal.

The new uses and the expanded permit days need more analysis and NEPA process. This EA does not thoroughly analyze the effects to all resources within BDNF and it does not consider the effects to wildlife or the experience of private users. How will it affect hunting opportunity?

The seasonal effects are not fully analyzed. How will each use and additional permits affect each season including resources affected within each time period. There don't seem to be considerations or limits by season or type of use. There should be more specific limits based on seasons and types of use. It seems these are blanket permits allowing outfitters and commercial operations to choose when and where without NEPA and regardless of effects.

I am concerned at the idea of 118 days of snow cat skiing in the Gravellys. The Gravellys are home to Grizzlies that already get into conflict with livestock producers and hunters. How will this affect denning? How will it affect their habitat? How will they react? Permitting winter use in denning habitat should not be allowed in any number.

Wilderness Study Areas if managed in accordance with law, will not see any increase in use. Expanding uses and permits will do just that. No new permits or activities should be allowed and frequent monitoring of illegal use and current use for increases should be conducted. Certainly, adding uses and permits is in violation of the Wilderness Study Act.

Information on West Yellowstone and Moab and the conflict created by large motorized caravans/tours through town and areas where people recreate. It is difficult to breathe in West Yellowstone and the dust and noise is outrageous in Moab. Locals are finding it inhabitable. Increased motorized use has long ranging effects. It will also increase infrastructure costs. There already parking issues in BDNF. Once a few trailers and trucks carrying OHV's park, there is little space left. This is happening in the Anderson Mountain area and the Gibbons Pass road area to mention a few. Can you imagine what will happen with this increase? Have you analyzed the infrastructure costs associated with this increased commercial use? The taxpayers/private users will again pay the price.

Please reconsider this proposal. It will greatly affect wildlife, forest resources, and private users. Thanks for your consideration.