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Comments: Thank you for the opportunity to comment on the proposed Outfitter & Guide Permits #56926 Environmental Assessment. While I commend the USFS for maintaining a multiple use forest management strategy, I would advocate for Alternative A (No Action), or a substantially reduced proposed allocation of user days.

The EA correctly identifies MT population growth and increasing forest recreation in all forms as a major management concern. The natural resources and landscapes that we all enjoy are being exposed to heightened and increasingly diverse stressors within a relatively short period of time. While I understand the public service desire to accommodate the increased demand for guided and outfitted recreational opportunities, I believe that the EA falls short in assessing the cumulative impacts of adding to an already elevated level of recreation, and that a more conservative and thoughtful approach is warranted.

Four generations of my family have, and continue to live, work, and recreate within the project analysis area, specifically within the Big Hole, Pioneer, and Lima-Tendoy Landscape analysis areas. While I have worked and recreated across most of the Beaverhead Deer Lodge NF, I will try to focus the rest of my comments to these areas specifically.

Recognizing that there would some discretionary ability by USFS staff at the time of allocation, I believe that modeled user day allocations for the Big Hole and Pioneer landscapes are unacceptably high, with a nearly 475% increase for the Big Hole and 100% increase for the Pioneers. These areas are valued by locals and visitors alike for their remote and non-commercial character. The proposed allocation has the potential to fundamentally change how the Forest is used and by whom which, as stated, I believe requires a more conservative approach. These landscape areas are also well known as an elk hunting destinations, and outfitting has a long-standing and well-respected history within these landscapes. However, this level of increase would only exacerbate conflicts among user groups. MT FWP's 2023 Statewide Elk Management Plan specifically identifies hunter crowding, and changes in elk distribution towards private agricultural lands as management challenges for the Pioneer Elk Management Unit (HD 331), and large concentrations of elk on private land within the West Big Hole Elk Management Unit (HD 321). As elk hunting popularity (esp. archery season) has increased in recent areas, my family has witnessed first-hand how elk have changed their behavior and distributions to favor increased security. We have observed how landowner-hunter relationships have suffered, and how hunter crowding has reduced the quality of the hunting within these areas; something that I understand is hard to quantify but is no less real. I recognize that this issue is broader than the direct scope of this EA, but I feel it is imperative that a more thoughtful and conservative approach should be used to allocate user days to prevent further impacts to local elk populations, increased user conflict, and negatively impacting local agricultural producers.