



Brad Little, Governor  
Tom Kealey, Director

February 24, 2023

Objection Reviewing Officer  
Intermountain Regional Office  
324 25<sup>th</sup> Street  
Ogden, UT 84401

Submitted Electronically February 24, 2023, at: [objections-intermtn-regional-office@usda.gov](mailto:objections-intermtn-regional-office@usda.gov)

[REDACTED]

**Re: Sawtooth National Recreation Area Outfitter and Guide Management Plan Objection**

**Objector (36 CFR 219.54(c)(1)):**

Tom Kealey | Director  
Idaho Department of Commerce

[REDACTED]

**(a) Project, Plan (36 CFR 219.54(c)(4)):**

Outfitter and Guide Management Plan, EA and DN/FONSI  
<https://www.fs.usda.gov/project/?project=57197>

**Responsible Official (36 CFR 219.54(c)(4)):**

Jake Strohmeyer, Sawtooth National Forest Supervisor

**Project Location — National Forest/Ranger District:**

USDA Forest Service Sawtooth National Forest, National Sawtooth Recreation Area (Blaine, Boise, Custer, Elmore Counties)

**NOTICE:**

The Idaho Department of Commerce files this objection to the Sawtooth National Recreation Area Outfitter and Guide Management Plan draft decision (OGMP) and Final Environmental Assessment (EA) per the procedures described in 36 CFR 219, Subpart B.

**ELIGIBILITY TO OBJECT:**

The State submitted comment on the Draft EA and Outfitter-Guide Management Plan published in Legal Notice dated June 30, 2022. The State also enjoys the privileges granted it pursuant to the MEMORANDUM OF UNDERSTANDING Between: The U.S.D.I., BUREAU OF LAND MANAGEMENT AND IDAHO OUTFITTERS AND GUIDES LICENSING BOARD and USDA, FOREST SERVICE NORTHERN, INTERMOUNTAIN AND PACIFIC NORTHWEST REGIONS. The State and State Agencies therefore have standing in this issue.

Objection Reviewing Officer:

Dear Ms. Farnsworth – Regional Forester for the Intermountain Region.,

The Idaho Department of Commerce is aware of the US Forest Service's (USFS) proposed Sawtooth National Recreation Area Outfitter and Guide Management Plan Draft Decision Notice and FONSI published in Legal Notice dated January 12, 2023.

As our state's lead agency for economic development and tourism marketing, we recognize and respect the importance of this plan for future recreation use in the Sawtooth National Recreation Area (SNRA). We must also recognize the impact the plan may have regarding the Idaho Outfitters and Guides and other licensed industry members that operate in the SNRA. This letter is intended to support the industry, in particular the Idaho Outfitters & Guides Association's (IOGA) concerns with the plan's proposed geographic compartments and design elements, as well as the plan's proposed indicators and monitoring.

Tourism is Idaho's third largest industry, generating over \$4.8 billion in direct travel spending. Outfitters and guides are an integral part of that success, led by the efforts of the IOGA. Data modeling shows that outfitters and guides have an economic impact of \$1.1 billion a year, support 3,358 jobs (direct + indirect) and facilitate the sale of over \$2 million in tags and licenses a year. Outfitters and guides are also economic multipliers, bringing additional revenue and activity to the small communities where they operate. However, according to the most recent report completed in 2017 by the Outdoor Industry Association, the spending for Idaho outdoor recreation is nearly \$8 billion annually. This is especially relevant for the small Central Idaho communities that rely on the SNRA for their economic vitality.

Our State has provided prior comments by the Idaho Outfitters and Guides Licensing Board (IOGLB) on this matter on August 22, 2022. We are providing a formal objection to propose SNRA Outfitter and Guide Management Plan due to the following unresolved issues brought to the attention of USFS in the State's previous comment:

- A lack of coordination and consultation with the State pursuant to FS-BLM-OGML-MOU.
- A lack of any meaningful analysis of the negative Socio-Economic impact(s) of the proposed changes on our affected communities.
- "One-time amendments" not addressed in Draft EA Recreation Report (Page 18, Element A26, Design Elements).
- Project Title (all documents) still does not reflect "Land Based" nature of Plan.

Proposed Resolution: The Idaho Department of Commerce would appreciate the opportunity to meet with the Reviewing Officer to discuss its objections outlined above and ensure the State's interests are represented in any resolution(s). Please apprise us in writing of any response to these objections, possible resolution discussions, or of any further opportunities to comment.

In addition, we thank you for your consideration of IOGLB, IOGA, and the Idaho Department of Parks & Recreation's, objections, comments, and concerns, and for the opportunity to have these matters addressed.

Sincerely,

A handwritten signature in blue ink that reads "Tom Kealey".

Tom Kealey | Director

(Signature per 36 CFR 219.54(c)(2))