

February 24th, 2023

Rebekah Cain

Mystic Saddle Ranch



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

To: Objection Reviewing Officer
Intermountain Regional Office
324 25th Street
Ogden, UT 84401

Submitted via email to objections-intermtn-regional-office@usda.gov

Location-National Forest/Ranger District where project is located: USDA Forest Service
Sawtooth National Forest (Blaine, Boise, Custer, Elmore Counties)

To whom it may concern,

Mystic Saddle Ranch (MSR) would like to object 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. The SNRA notified us of this Decision on January 12, 2023. Jake Strohmeyer, Sawtooth National Forest Supervisor, Responsible Official.

MSR provided official public comment on the initial draft of the OGMP, May 15th, 2021 and again on the Alternative Draft B, August 30th, 2021. MSR also provided input on the Outfitter and Guides Needs Assessment in December of 2019.

Mystic Saddle Ranch operates predominately within the SNRA and has operations based specifically out of the Stanley and Redfish Lake areas. MSR has a vested interest in the preservation of the SNRA when it comes to resource protection, as well as the future recreation opportunities for the guided and non-guided public.

The following objections are in relation to previous public comment provided by MSR that have not been addressed in the final draft of the OGMP and EA.

Objection to Geographic Compartments

The plan provides geographic compartments that detail areas by usage and resource concerns. There are several major issues in regards to these designations and how they will influence authorization of outfitter proposals for new activities, long term and short term priority use days and changes to existing permitted activities.

Firstly, the majority of these compartments suggest that much of the SNRA is at, or near, recreational capacity due to biophysical and/or social concerns without sufficient data to substantiate these compartments. The OGMP and EA did not include a capacity analysis, visitor travel data or impact study. Alternative Draft B and the final draft provided information in regards to sensitive species areas of concern but did not provide any specific data in regards to actual use patterns, seasonal changes in use or capacity analysis to substantiate the designations of the geographic compartments. There is no significant data to suggest that the majority of the SNRA should be treated as high resource concern. Without an official capacity analysis, the broad designations are subject to personal bias and subjective opinion.

Secondly, the areas are extremely over simplified and generalized. For example, the entire east side of the Sawtooth Wilderness area is considered a “high use, high resource concern” area even though use varies substantially throughout from Redfish Lake to Cabin Creek area. Also, the compartments do not delineate between summer and winter use which have significantly different use patterns and impact concerns.

Another issue is that the compartments do not take the varying differences of the Recreation Opportunity Spectrum (ROS) or wilderness classes into consideration. The compartments do not acknowledge the amount of access available for different user groups in relation to actual use because it lacks the utilization of the ROS and the desired conditions of each wilderness class that are included in the original Forest Plans throughout the SNRA.

In addition, the concerns that are detailed within the geographic compartments are largely fueled by the majority user group, the non-guided public. The EA did not address the impact of non-guided use versus guided use therefore the compartments are not specific to outfitted activities and should not be included in the plan.

Lastly, the original draft of the OGMP and the Alternative Draft B included regulations that would limit or even reduce outfitted use in the “Red Compartments”. The final draft of the OGMP and EA removed the majority of those potential use concerns and stipulated that additional use could be requested within the entire SNRA as well as amend the Sawtooth Wilderness Plan to accept new permit requests. The substantial changes that have been made to the plan since the original draft have caused the geographic compartments to become irrelevant to the proposal evaluation checklist since it will be necessary that every outfitter proposal be looked at on a case-by-case basis regardless of geographic compartment.

In summary, the compartments are vague and simplistic. They lack the inclusion of important features such as the ROS and Wilderness Class and they do not compare outfitted use to non-outfitted use. The compartments were determined without use pattern data or a capacity analysis.

Therefore, the compartments are not an effective tool to aid USFS personnel in evaluating outfitted activity proposals and should be removed from the plan.

As per MSR public comment provided on August 30th, 2022: **“Mystic Saddle Ranch (MSR) recommends the map be removed from the plan as a basis for restricting additional or new use within the SNRA and that outfitter proposals be looked at in detail based on the ROS objectives, wilderness class, public need and activity type. Restrictions that are in addition to those already existing in Wilderness and Forest Plans should be determined after an official capacity analysis.”**

Objection to Indicators and Monitoring

The Alternative Draft B provides Table 12 for Indicators, Thresholds and Potential Management Actions. These specific subjects are already addressed in each individual Forest and Wilderness Plan. The combination of these varying thresholds ignores the ROS and wilderness class of specific areas within each forest plan.

The plan does not address how USFS personnel intends to monitor and distinguish impact of guided use versus non-guided use. According to the numbers provided by the NVUM on page 79 of the alternative draft B, guided use makes up only 3.4% of the overall use within the SNRA. It is, therefore, crucial that the USFS has a practical and transparent method to monitor impact and determine if it is being caused by the outfitted public or by the majority user group, the non-outfitted public. By determining the cause of impact, the USFS can then effectively determine the potential management action in response. The current wording in Indicators and Monitoring section of the OGMP does not provide clarification on how non-guided and guided use will be monitored nor does it provide assurance that the outfitted user group will not be penalized for overall user impact.

MSR recommends that under Wilderness Character and Recreation Experiences, the existing Wilderness and Forest Plans should be used for determining thresholds (standards), indicators, and monitoring and that Table 12 be removed from the plan.

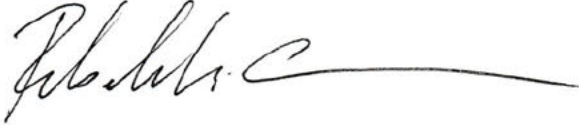
As per MSR public comment provided on August 30th, 2022: **“MSR recommends that under Wilderness Character and Recreation Experiences, the Wilderness Plan should be used for determining thresholds (standards), indicators, and monitoring as each plan already has these elements included.”**

Conclusion

Mystic Saddle Ranch has been actively involved at every possible stage in the process of the proposed plan. MSR is thankful for the opportunity to provide objections and input. MSR recognizes that the creation of the OGMP has been a difficult and arduous process. The inclusion of input by the local outfitting community offers the best possible solution to creating a

functional management plan that will effectively protect the resource and the future of guided activities on the SNRA.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rebekah Cain', followed by a long horizontal flourish.

Rebekah Cain/ Lead Objector

