

Data Submitted (UTC 11): 2/17/2023 7:00:00 AM

First name: JOSH

Last name: JOHNSON

Organization: Idaho Conservation League

Title: SENIOR CONSERVATION ASSOCIATE

Comments: Dear Objection Reviewing Officer,

Please find the attached objection submitted on behalf of the Idaho Conservation League regarding the SNRA Outfitter and Guide Management Plan draft decision. We are generally supportive of the direction the USFS is heading with this project but would like to be included in whatever objection resolution meeting(s) are scheduled between the Forest Service and other objecting parties.

Regards,

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Josh Johnson (he/him)

Senior Conservation Associate

Idaho Conservation League

February 17, 2023
Sent via email To: Objection Reviewing Officer
Intermountain Region, U.S. Forest Service
324 25th Street
Ogden, UT 84401
objections-intermtn-regional-office@usda.gov
Re: OBJECTION to the SNRA Outfitter and Guide Management Plan
Environmental Assessment (EA) and Draft Decision Notice and Finding of No Significant Impact (DN/FONSI)
Responsible Official: Jake Strohmeier, Forest Supervisor, Sawtooth National Forest
I. INTRODUCTION
Pursuant to 36 CFR Part 218, the Idaho Conservation League (ICL) files this Objection to the Environmental Assessment dated January 2023 (EA), and Draft Decision Notice and Finding of No Significant Impact dated January 2023 (Draft DN/FONSI), issued by Sawtooth Forest Supervisor for the SNRA Outfitter and Guide Management Plan. Pursuant to Part 218, ICL is the Objector. Primary contact person: Josh Johnson, ICL Senior Conservation Associate, PO Box 2671, **PII redacted**
The Objectors have fully participated in the Forest Service review of the SNRA Outfitter and Guide Management Plan. ICL submitted scoping comments on the project in August 2022. ICL has also met with SNRA staff regarding this project multiple times throughout the NEPA process. Lastly, ICL's membership has a significant interest in this project as well given its implications for a beloved place in our state, the Sawtooth National Recreation Area.
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Pursuant to 36 CFR 218.8, the Objector states that the following content of this Objection demonstrates the connections between the Objector's comments for all issues raised herein unless the issue or statement in the EA or Draft DN/FONSI arose or was made after the opportunity for comments, as detailed herein. Pursuant to 36 CFR 218.8(b), the Objector's previous comments dated August 31, 2022, are hereby incorporated by reference.
II. STATEMENT OF REASONS
ICL is supportive of the purpose and need of the SNRA Outfitter and Guide Management Plan (OGMP) and has invested significant time and effort in developing recommendations for project design features and scope. We believe that this plan should (and attempts to) strike a balance between providing a reasonable amount and breadth of guided recreational opportunities in the SNRA while still providing sufficient protections for wildlife, wilderness values, and other important resources. Ideally the Forest Service can find a solution that is workable for both the guiding/outfitting community and the environment. We intend to use the objection process as a means to strengthen the project record, participate in any objection resolution discussions with other objectors, and address any remaining issues of uncertainty as needed. Should other objectors raise additional concerns or bring

additional information to the Forest Service's attention, we hope to use the objection process to review this information and offer our perspective on any needed project modifications. We are concerned that if another party requests changes, the final outcome may not reflect the intended, balanced goals of this management plan. Lastly, we do have a couple of suggestions for strengthening the Environmental Assessment and Draft Decision: 1. Develop a robust monitoring plan incorporated into this OGMP that can be used to inform future OGMPs for the SNRA. 2. Before including Design Element A19 in the OGMP, the Forest Service should assess what percent of use at Galena Pass is guide-related and analyze if it is better to continue to concentrate use in this area or disperse it with the potential to increase impacts to wolverines in other areas. If SNRA determines that it will move forward with the Draft Decision for this project without significant changes, then the Idaho Conservation League would be willing to withdraw this objection once we have an opportunity to formally discuss the points referenced above with the relevant Forest Service staff. Respectfully submitted, Josh Johnson Senior Conservation Associate Idaho Conservation League