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Organization: NORDIC AND BACKCOUNTRY SKIERS ALLIANCE OF IDAHO
Title: PRESIDENT
Comments: February 24, 2023

Objection Reviewing Officer

Intermountain Regional Office

324 25th Street

Ogden, UT 84401

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

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

To whom it may concern,

The Nordic and Backcountry Skiers Alliance of Idaho (NAB) 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. This draft decision was noticed in the Challis Messenger January 12, 2023. Jake Strohmeyer, Sawtooth National Forest Supervisor, Responsible Official.

NAB filed timely comments on the Draft EA for this project on August 29, 2022. We also provided input during the 2020 Outfitter and Guides Needs Assessment, and provided comments on the Draft Proposal to the SNRA in May 2021.

On behalf of The Nordic and Backcountry Skiers Alliance of Idaho, thank you for your work on developing a new SNRA Outfitter and Guide Management Plan (OGMP). Our specific comments will address the winter management component of the Plan and the priority use day limits on the number of people who can access the backcountry ski huts in the Sawtooth Mountains and in the Wood River Valley.

#1 Objection: The OGMP does not allow for growth in backcountry skiing or huts use that has been identified as a primary "Need" in the 2019/20 Needs Assessment to be met.

Throughout NAB's comment letter were statements about the growing demand for backcountry skiing and hut use and the fact that the SNRA utilized outdated data on the user days for its need assessment. The Blaine County Commissioners, Sun Valley Economic Development, and other key stake holders have joined the Nordic and Backcountry Skiers in expressing the need for the Plan to increase the number of days for existing backcountry ski huts to be fully rented during the winter season.

Backcountry skiing is the fastest growing segment of the ski industry and supports our Wood River economy. Under the proposed OGMP, the SNRA has established use limits based upon past use rather than allowing growth to meet future demand. This same approach is not taken for the other winter huts or cabins on the SNRA. The SNRA has permitted the backcountry ski huts with 14 bunks but now, after 40 years of use, the SNRA is not going to allow these bunks to be fully occupied? The number of Priority Use Days should be equal to the number of beds (bunks) in each hut multiplied by the number of winter days.

The SNRA neglected to follow USFS protocol by increasing Priority Use Days at the huts for the past 12 years and instead chose to give temporary use days on an annual basis to meet the demonstrated public need. This is your opportunity to allocate enough use days to ensure the public has access to existing huts in the future during the entire winter season.

This need to increase priority use days should also relate to Sun Valley Guides and that the SNRA use the data from 2021 to allocate Priority Use to this outfitter. The Covid pandemic forced this outfitter to shut down for most of the winter and summer season of 2020, and the use data from 2020 does not represent the high need for these services, which is evidenced by the Use Data of 2021. Allocating Priority Use based upon 2021 data will help to increase safety in the backcountry as well as meet the public need.

Potential Resolution:

1. As started in our August 29, 2023, letter, priority use days should reflect full utilization of the 7 backcountry ski huts.
2. An alternative and more common-sense approach would be to change how these huts are permitted to align with how the other huts on the SNRA are managed (the 4 Galena Yurts and the SNRA's Redfish Cabin) - without use-day allotments. This change would create consistency with how ski huts are handled generally on National Forest lands throughout the west. Other examples of this type of management include the largest hut system on the National Forest System, 10th Mountain Division in Colorado, as well as the largest hut system in the State of Idaho, managed by Idaho Parks and Recreation on USFS lands.
3. Use the 2021 Actual Use Numbers for Sun Valley Guides Priority Use allotment.

4. Change the geographic compartments to more accurately reflect the nuance of actual use and allow more use in places where current use is low.

The SNRA is a National Recreation Area and the EA provides no evidence documenting why it benefits the environment, wildlife or people enjoying the SNRA to restrict user days at winter recreation sites that have been permitted for over 40 years. Limits on winter recreation use without demonstrated or documented negative impacts will unnecessarily harm local small businesses, the recreating public and the economy. These restrictions do not occur on other National Forests nor are they applied uniformly on the SNRA.

#2 Objection to design element A18 places an unreasonable burden on permittees

As stated in our August 29, 2022, Comments: It is unreasonable to require a small outfitter to provide alternative winter parking for hut use. Design Element A18 requires any increase in service days be accompanied by an approved parking or shuttle service plan. In our May 2021 comments on the Scoping document, as well as in our August 2022 comments on the Draft Decision we noted that NAB continues to identify Highway 75 winter parking limitations as negatively impacting current winter Nordic and Backcountry skier access as population pressure increases. Outfitter use at the trailheads has remained consistently the minority use for 10 years, while other uses have grown significantly.

Potential Resolutions:

1. Amend the verbiage of A18 to indicate it's applicability to New Use, not Additional Use.
2. Find a collaborative solution to the lack of parking among all the stake holders. It took years of partnership between the SNRA and the BCRD to plan and implement the new parking at the Boulder Flats and at Prairie Creek. There is clearly a need to address winter parking issues, but assigning that responsibility to one small outfitter, who is the minority use, will not solve the problem. A collaborative solution is needed from many entities, and we hope the SNRA will work with stakeholders to find one.
3. Remove the requirement of a shuttle service plan and develop a Parking Pass requirement for all users

Objection #3: "Choose No Action on Design Element A12"

We requested "Choose No Action on Design Element A12" in our August 2022 Comments: Additional Use at the 3 Huts adjacent to the Sawtooth Wilderness does not negatively impact Wilderness Solitude or other Wilderness Characteristics

The OGMP states that use at the Sawtooth Huts have a negative effect on "other users'" ability to experience solitude. The OGMP defines all use at the 3 huts adjacent to the Sawtooth Wilderness as "Wilderness Use", when in reality approximately 1/3 of the visitors to the huts actually enter the Wilderness. The amount of visitors from the huts that enter the Wilderness is approximately 8-10 people on average per hut, every third day during the winter, and one third from Bench and Fishhook enter the wilderness.. In our comments from August 29, 2023 we noted that the people using the backcountry huts have a very limited impact on others seeking solitude in the Sawtooth Wilderness. There are an additional 200,000 acres of opportunity for solitude in the Sawtooth Wilderness alone and an additional 150,000 acres in the Boulder White Cloud Wilderness areas for those seeking solitude away from backcountry ski huts. People seeking solitude would not go to backcountry ski huts where, predictably, there will be other skiers skiing around the huts. In the summer it is more difficult to find solitude in the Sawtooth Wilderness, but not so in the winter. There has been no evidence for social conflict nor negative environmental impact from these huts in their 40 years of operation.

No Evidence of Wildlife Impact

As currently written, the OGMP could arbitrarily impose limits on ski hut use due to wildlife concerns. Scientific evidence and the OGMP EA note that wildlife generally adapts to human use patterns and after 40 years in the same location, the local wildlife population has had plenty of opportunity to adapt. Imposing limits on winter use due to wildlife is arbitrary when there is no science that documents that having fewer rental nights at the winter huts and fewer than 14 skiers a day will have less impact on the listed species of concern. The winter recreation user map of the Sawtooth show negligible overlap with any mapped areas of "species of concern".

Potential Resolutions:

1. - Apply Winter versus Summer designations for A12
2. - Remove the language in the Draft Decision that refers to all use at the Sawtooth Huts as Wilderness Use
3. - Develop an evidence-based criteria that empirically evaluates impacts of winter hut use on wildlife, Wilderness character and other Wilderness characteristics.

As we stated in our August 29, 2022, letter, the limits to Wilderness use days is inadequate as written to meet the current and future needs of the outfitted public using winter huts now and into the future.

Conclusion

In conclusion, we urge the Reviewing Officer to make the changes to the Draft Decision suggested in this Letter

in order to help develop the future of outfitting and guiding on the SNRA to best preserve the natural resources and serve the public.

The OGMP states that Outfitting and Guiding makes up only 4% of total use on the SNRA. Unnecessary limitations on outfitting and guiding will only cause population pressures to worsen and provide less access to the education, professionalism and stewardship that outfitters bring to visitors to our National Forest.

Our backcountry ski huts support our local winter economy and the Nordic and Backcountry Skiers Alliance hopes that you will address the issues we have outlined here and will revise the Draft OGMP Plan to allow for sustainable growth in winter recreational activities.

We thank you for the opportunity to provide additional insights into the concerns we have for the Draft Decision as currently written, and appreciate your consideration of these items in the Final Decision. We request to meet with the Reviewing Officer to discuss the concerns and proposed solutions prior to the Final Decision. Please apprise us of a convenient time to meet with us.

Thank you for your consideration of these comments. Paddy McIlvoy, President

Nordic and Backcountry Skiers Alliance of Idaho