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Organization: SAWTOOTH CONSERVATION & RECREATION ALLIANCE, INC

Title: MEMBER, BOARD OF DIRECTORS

Comments: February 21st, 2023ATTN: Objection Reviewing Officer Intermountain Regional Office 324 25th Street Ogden, UT 84401Re: Sawtooth National Recreation Area Outfitter and Guide Management Plan

ObjectionSubmitted via email to objections-intermtn-regional-office@usda.govTo Whom it May Concern,This letter contains the official objections of the Sawtooth Conservation and Recreation Alliance (SCRA) regarding 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 SCRA represent landowners and local recreationist that feel strongly about the preservation and enhancement of recreation opportunities that take place on the SNRA. The SCRA has a major interest in the overall potential impact that the proposed plan has on the future of guided and non-guided use on the SNRA. SCRA membership consist of the majority private property owners and local business owners within the SNRA that have a vested interest in private property rights as well as the enhancement of recreation opportunities throughout the entire SNRA. The SCRA strongly believes that the presence of outfitters and guides is of extreme importance to the local community, economy and character of the SNRA and that a strong outfitter and guide presence is essential to enhancing the recreation opportunities as well as the safety of the guided and non-guided public. The group feels that the overall wording and format of the plan and the alternative is largely restrictive and biased in nature against the local outfitters that do so much good in the community.The SCRA provided official public comment on the Alternative Draft B of the OGMP and EA, August 31st, 2021. The following objections are in relation to what was mentioned in public comment and was not addressed in the final draft of the OGMP.The SCRA continues to believe the approach that the SNRA is taking in OGMP is outdated and inappropriate simplistic. The SNRA is an important part of the West's recreation network and deserves a more sophisticated and nuanced approach to visitor management and integration of guides and outfitters with such management. We understand the urgent need to get a plan in place for this summer, but we do not want to see the SNRA stop working towards a more appropriate management plan over the medium term.Geographic CompartmentsThe SCRA does not support the Geographic Compartment map that was provided in the proposed action and alternative B. The major issue with the provided compartments is that designations were not arrived at through an official capacity analysis, nor informed by visitor travel data or impact studies. Additionally, the compartments do not take the varying differences of the Recreation Opportunity Spectrum or Wilderness Classes into consideration. The map over-generalizes potential crowding to the vast majority of the SNRA without any specific data to support that assertion. The plan should not include a map that is predominately determined by subjective analysis. Overcrowding should be determined by an official capacity analysis that is specific and localized on a drainage-by-drainage basis. Any other determination is subject to bias and personal opinions. Each individual outfitter request for additional or new use should be looked at in comparison to the ROS or Wilderness Class, public need and capacity objectives. The SCRA recommends removing the geographic compartments map from the plan.Shuttle ServicesThe SCRA does not support the inclusion of the Redfish Lake shuttle in the OGMP as it is believed there is the intention of limiting the amount of people that can access Redfish Inlet via the shuttle service provided by Redfish Lake Lodge. The plan does not provide any data to suggest that this change is necessary in the SNRA. The shuttle provides a hugely important service to many recreating groups in the area. The shuttle allows less-able bodied recreationist the opportunity to reach the Wilderness within a short hiking distance, it allows access to guided services such as rock climbing or pack trip pickups/ drop offs and gives back country hikers the ability to traverse longer distances as the hike from Grandjean Lodge to Redfish Lake Lodge is very popular. The plan does not include any type of reasoning for capping all of these user groups nor do they provide a capacity analysis to substantiate a necessary mitigation of shuttle users. The SCRA recommends that the Redfish Lake Lodge shuttle be removed from the plan until an appropriate capacity analysis has taken place.Priority Use DaysThe SCRA supports the initial allocation increase described in final draft of the OGMP, however, any outfitters that do not have historic use for five years prior to 2021 should be allowed to use their most current use numbers to determine their priority use increase. The SCRA is aware of at least one outfitter

that stands to lose necessary priority use days due to an incomplete data set. The SCRA recommends that the plan allow for exceptions in these special cases and look at use from 2021 and 2022 in such situations so as to get the most accurate results.

SummaryThe SCRA feels that the overall intent of the OGMP is to limit outfitters and guides based on crowding, resource and visitor experience concerns that are not related to outfitted use. Lack of trail and road maintenance, lack of trailhead access and availability, reconstructed parking lots and loss of amenities are just some of the reasons that the SNRA is experiencing bottle-necking of public user groups to specific areas. Limiting the outfitted groups in an attempt to address crowding, resource and visitor experience concerns will not benefit the SNRA and has the potential to severely diminish the guided recreation opportunities for the public in the future. The SCRA fully supports the outfitting and guiding community within the SNRA. Local outfitters and guides provide education to the public, trail maintenance, aid in search and rescue and are a staple to the local economy. Outfitter growth should be encouraged and supported unless the resource is being directly threatened or the area is determined to be at capacity through an official capacity analysis. To treat the guided public differently than the non-guided public simply because it is easier to do so, directly goes against USFS policy. The SCRA intends to be directly involved in the process of this management plan to ensure that the SNRA continues to be a place of recreation opportunity as it was intended to be.

Jon L Christianson
Member,
Board of Directors
CC: Al Barker, Wayne Butts, Custer County Commissioners
Jeff Bitton, President, Idaho
Outfitters and Guides Association