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First name: Harry

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Organization: Sun Valley Economic Development

Title: Executive Director

Comments: Dear SirsRE: Sawtooth National Forest Outfitters Guide Management Plan ObjectionSun Valley Economic Development (SVED) is the Blaine County Idaho economic development organization that seeks to create sustainable growth in the Sun Valley region. SVED objects to the proposed adoption of Plan B prepared by the Sawtooth National Recreation Area Ranger District (the Agency) on the basis of the following comments:

1. Improper Capacity Analysis. The Agency did not perform a professional capacity analysis. Instead, they used a scoping study approach to determine the license limitations. They also ignored data collected and available for analysis for the full year of 2021 and 2022 which would have supported a higher allocation. Using the data from 2020 is misleading due to the COVID pandemic which closed down all of Blaine Co under an emergency declaration starting in March 2020, greatly reducing reported user numbers. The post Covid 12% growth in Blaine Co population as people fled urban areas for rural areas like Sun Valley has translated into a 2x increase in user days when compared to 2020's figures.
2. Misguided focus on Commercial Outfitters controls. Based on all data from 2016-2019, Commercial outfitters were allocated only 3-5% of the total tracked user days. The Agency's focus on controlling a very small percentage of the ~750,000 total user days, does little to nothing to fulfill its mission of protecting the Sawtooth National Recreation Area. Outfitters are exemplary stewards of this national resource and minimize overuse by educating guests on safe and healthy practices, dispersing operations throughout the area to avoid overconcentration, and giving back through volunteer trail maintenance and cleanup.
3. Significant Restraint of Trade. Limiting the outfitters as planned will damage their short- and long-term economic viability and is a significant risk to maintain regional jobs in the outdoor recreational sector. The purpose of the Outfitters Plan is to balance public use / enjoyment with protection of the natural environment; this plan is skewed much more towards the latter to the detriment of the former. The limitations imposed by the plan also limit public access to the farthest reaches of the Sawtooth National Recreation Area, while other more proximal areas (e.g. Smiley Creek) are seeing use below safe capacity limits. Such constraints are in effect a de facto privatization or taking of public lands from their intended use and purpose.

Sun Valley Economic Development has the standing to object based on an earlier comment letter submitted in 2022. Accordingly, we ask that this case be referred to the Regional Office in Salt Lake City UT to consider amendments to the current plan. We support a change to the plan as opposed to reverting to the old plan but based on our comments above.

Respectfully submitted Harry Griffith
Executive Director, Sun Valley Economic Development
January 31, 2023