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Title: SENIOR POLICY DIRECTOR

Comments: February 23, 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, Objector Winter Wildlands Alliance (WWA) files this objection to the Sawtooth National Recreation Area Outfitter and Guide Management Plan draft decision (OGMP), Final Environmental Assessment (EA), and Finding of No Significant Impact (FONSI) 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. WWA filed timely comments on the Draft EA for this project on August 31, 2022. We also provided input during the 2019 Outfitter and Guides Needs Assessment, and provided comments to the SNRA on April 19, 2022. We did not receive notification of the Proposed Action and therefore were unable to provide timely comments on the scoping notice. During the Draft EA comment period we also met with SNRA staff to discuss the proposed plan and alternatives. The SNRA is an important and cherished landscape for WWA's constituents, with a long history of backcountry skiing and winter backcountry hut use. Because this OGMP will affect permitting and use of backcountry huts in the SNRA, this decision is of keen interest to WWA and our members. The Bench Hut, Fishhook Yurt, and Boulder Yurts comprise one of North America's oldest and most distinctive backcountry hut systems, providing access to phenomenal winter recreation opportunities in the Sawtooths. We commend the SNRA for developing a comprehensive (land-based) outfitter and guide management plan to provide greater certainty for guides and outfitters working on the SNRA, efficiencies for the Forest Service, and to balance commercial use with general public use and the area's conservation and wildlife values. We appreciate that the SNRA has been responsive to public comment throughout this process, and we hope that through this objection process we can resolve our concerns with the draft decision.

Objections I. DESIGN ELEMENT A18 PLACES AN UNREASONABLE BURDEN ON PERMITTEES
Design Element A18 requires an approved parking or shuttle service plan for proposals that would increase service days and/or offer new opportunities in winter along the Highway 75 corridor and other areas. As we discussed on pages 2 and 3 of our August 2022 comments, this requirement would place an unreasonable burden on backcountry hut operators who are granted new service days, places backcountry hut users at risk, and would not meaningfully address, much less solve, the winter parking issues present in the SNRA. Winter parking should be addressed at a larger scale that accounts for the many different types of visitor use contributing to the problem. Otherwise, parking shortages will persist. Design Element A18 poses a public safety concern for winter hut users. It's not realistic to assume a small business owner would be able to create or maintain a new winter parking lot along the Highway 75 corridor, so to satisfy this design criteria hut operators would need to arrange shuttle services for their guests. If a hut visitor were to experience an emergency or otherwise need to leave the SNRA early or unexpectedly, not having transportation readily available at the trailhead poses a legitimate safety concern due to the cold weather and harsh environmental conditions present throughout the season. There is no cell phone service or radios at the huts and not all guests carry satellite communication devices, so not all guests are prepared to communicate with the outside world from the backcountry or the trailhead. Forcing people - including potentially those with injuries - to wait at the trailhead in the winter until a ride can be arranged to accommodate an unforeseen circumstance is unreasonable and unsafe.

Remedy? Design Element 18 should be removed or revised to read "Within the Wood River, Sawtooth East, and Salmon Headwaters/Sawtooth Valley Geographic Compartments; require an approved parking or shuttle service plan for day use proposals that would increase service days and/or offer new opportunities in winter. Nov. 1 to May 1"

II. THE OGMP IMPROPERLY CONSIDERS HUTS LOCATED OUTSIDE OF WILDERNESS AS WILDERNESS USE
On pages 3-5 of our August 2022 comments we discussed our concerns about classifying the Bench and Fishhook huts as Wilderness uses even though they are not physically located in the Wilderness. By classifying these huts as Wilderness uses the EA incorrectly assesses impacts to Wilderness and the OGMP unnecessarily limits use of these huts. While we understand the rationale for limiting service days within the Wilderness, especially given the documented impacts and concerns associated with

summer Wilderness activities, this limit should not be placed upon use of huts, which are located outside of the Wilderness. Not every user day spent at the Bench and Fishhook huts actually involves Wilderness use. Therefore, the OGMP authorizes far fewer use days for these huts than the level analyzed in the EA. Thus, at the very least the EA analysis supports increasing priority use days for these two huts. In their August 2022 comments, Sun Valley Trekking explained how it is very likely that only one third of use days at the Bench and Fishhook huts actually occurs in the Wilderness. Furthermore, the SNRA counts every guided user day to these (and other huts run by Sun Valley Trekking) twice, because the hut and the guide service are operated by separate permittees with separate use days. This artificially suppresses the number of priority use days available for the Bench and Fishhook huts even below what the OGMP presumably intends. This double-counting also confuses or obscures the Forest Service's attempts to monitor and track Wilderness use. In addition, the limits set by A26 are inadequate to meet current and future demand for hut use and do not account for the ways in which hut use can mitigate impacts to Wilderness (as described in our August comments). For many reasons, classifying visitation to huts located near the Wilderness boundary as Wilderness use is irrational and should not be part of the final plan. Design Element A12 limits new or additional priority use in the Sawtooth Wilderness or on trails that access the Sawtooth Wilderness, only if the proposed use will meet wilderness management goals and guidelines described in the wilderness and forest plans; solitude and recreation site monitoring is up to date, and monitoring data confirms that established thresholds are being met. We would support this Design Element if it did not stipulate that new or priority use could be permitted "only if...recreation site monitoring is up to date". This language unnecessarily limits use of the backcountry huts when the SNRA doesn't have the staff to perform the required recreation site monitoring. While this may be an important and necessary element for permitting other uses in the Sawtooth Wilderness, the huts are unique. After 40 years of existing use at the backcountry ski huts and no documented or significant negative impacts, SNRA budget constraints and staff limitations of the Forest Service should not result in limiting use at the huts. We support monitoring and believe this is an important element to management that should occur, but a lack of Forest Service capacity to conduct such monitoring should not hinder public opportunities to rent the Sawtooth huts. We understand the rationale behind the Wilderness concerns articulated in the EA, but this rationale does not logically extend to winter hut use. The EA cites increasing the spread of invasive species, loss of native vegetation, and additional ground disturbance, particularly at assigned sites, as examples of outfitter provided activities having the greatest effect on the Sawtooth Wilderness. The EA then relies on these examples to justify the need to limit guided use in the Wilderness. While we don't disagree with this rationale for summer activities, none of these effects pertain to winter use of huts or winter recreation activities in Wilderness. The EA also cites concerns about reduced opportunities for solitude in Wilderness but includes no data to support this concern in relation to winter use. We do know, however, that overall visitation in the Sawtooth Wilderness is significantly lower in winter versus summer. The EA does not adequately describe whether the negative effects on Wilderness character associated with alternative would rise to a level of concern, or be outside the range of what is considered acceptable for Wilderness management. Absent monitoring data showing that hut use outside of the Wilderness is actually impacting other winter Wilderness visitors' opportunities for solitude, or other Wilderness qualities, concerns about the impacts of hut users on the Wilderness character - especially on opportunities for solitude - is speculative at best. Remedies: ? Do not classify huts, which are not located in the Wilderness, as a Wilderness use. OR ? Provide a clear means for the authorized officer to increase priority use days specifically for hut use "in" Wilderness beyond the 200 service days per season cap. ? Do not double-count use days for guided hut trips - apply use days to one outfitter on a guided hut trip. ? Develop a science-based monitoring program to evaluate the impacts of winter hut use on Wilderness character to inform future decisions regarding hut use on the SNRA. ***** Thank you very much for your consideration of the above objections. We would like to meet with the Reviewing Officer at a mutually convenient time to discuss the above concerns. Please inform us in writing of any responses to these objections, of any further opportunities to comment, and of the final decision. Sincerely, Hilary Eisen, Lead Objector Policy Director Winter Wildlands Alliance