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Organization: SUN VALLEY TREKKING

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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,

Sun Valley Trekking (SVT) 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. The SNRA notified us of this Decision on January 12, 2023. Jake Strohmeyer, Sawtooth National Forest Supervisor, Responsible Official.

SVT 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 acknowledge and appreciate the SNRA for developing an outfitter and guide management plan in an effort to guide decisions and future impacts concerning outfitting and guiding. We appreciate that the SNRA has made an effort to adapt the OGMP according to public comment received throughout this process, and we hope that through this objection process we can resolve our major concerns with the draft decision.

Objections

#1 Objection: The OGMP does not adequately acknowledge nor allow for a primary "Need" identified in the 2019/20 Needs Assessment: Huts and more access to Huts was identified as "High" in the 2019/20 Needs Assessment.

We raised this issue on Page 3 of our August 2022 Comments:

"The over 85-year history of ski huts on the Sawtooth Forest demonstrates the long-standing practice of hut skiing in the mountains of Central Idaho. Nowhere else in the United States has such a long and continuous tradition of hut skiing been experienced. This history of hut skiing has led to many generations of the public

utilizing huts to access the winter landscapes of the Sawtooth Forest as a tradition passed from parents to children, friends to friends, school group to school group. As indicated above, the growth in interest in backcountry skiing nationally combined with population growth regionally has led to more participation in hut skiing every year. This is a trend that has been steady, sustainable and is expected to continue.

The SNRA conducted a Needs Assessment in 2019/20 to evaluate the needs and impacts of all guiding on the SNRA. While no questions in the Needs Assessment related to huts specifically or their importance to the public, there was overwhelming comment given by the public regarding the value of huts and future needs for huts and hut skiing. Huts and the need for more access to huts was the single most referenced item in the Needs Assessment, indicating the extreme importance of huts to the public. (Reference: SNRA Needs Assessment Public Comments) Huts and Guided Hut Skiing were identified as a primary need in the Needs Assessment. The Needs Assessment specifically identified this "Common Theme" in the public comment:"

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* "An expansion of the backcountry hut system to improve connectivity, provide increased access and disperse winter use, provide longer winter hut to hut opportunities, and provide summer hut to hut trekking opportunities;"

Huts and access to more huts was the single most referenced item in the Needs Assessment of 2019/20. The OGMP as drafted will make expansion of uses within the areas identified as Red Compartments very difficult and unlikely. All existing huts are within the Red Compartments and any connectivity to existing huts would have to be in Red Compartments. The Yellow and Green Compartments do not provide access to suitable future hut locations. As no Capacity Analysis has been conducted, the Compartments are overly broad, and do not adequately reflect the actual uses by season or the environmental concerns identified.

#1 Resolution: Adjust the Red Compartment designations to more accurately reflect use patterns and environmental and social concerns as they relate to actual use and seasons. For example, the upper end of the Prairie Creek drainage is an area that receives extremely little winter use and does not accurately fit the definition of the Red Compartment designation in winter. This is a highly suitable area to build a new hut as it has very little winter use, is in a non-motorized area and would allow for connectivity to existing huts. A reasonable resolution to the problem is to designate zones by seasons where use patterns are drastically different, such as upper Prairie Creek or the Southern Sawtooth.

#2 Objection: In our August 2022 Comments we requested "No Action" on Design Element A18. Design Element A18 places unreasonable and unfair burden on the permittees and represents a bias against the public hut users. Outfitter use at the trailheads has consistently remained the minority use for 10 years while other uses have grown significantly. A-18 is not a viable solution and will not meaningfully address the parking problem on the SNRA.

From Page 11 of our August 2022 Comments:

"The OGMP creates new rules and regulations related to parking for hut users. Design Element A18 specifically requires the outfitter to develop new parking areas or shuttle plans in order to gain more use days at existing huts. Historically, parking has never been a problem at the established trailheads that access the huts. It has only been in the past 5 years that parking congestion has become an issue at the 2 trailheads which access the huts on the SNRA: Redfish Lake and Billy' Bridge. As is clearly evident in the hut use data submitted annually to the SNRA, that hut use at these trailheads has not increased appreciably during these years, and in fact has

gone down on some of these years. Yet parking congestion continues to increase. Why? The answer can be identified at each particular location:

Redfish Lake: The Redfish Lake trailhead began having parking congestion problems soon after the SNRA began renting the Redfish Cabin to the public. No additional parking was added when the SNRA began to rent the cabin to the public and as far as we are aware there was no EA or Public Scoping done for this new use. Currently, the Redfish cabin is rented nightly throughout the winter, which is not subject to use day caps like the SVT huts. There has also been a notable increase in day use traffic at the Redfish trailhead for dog walkers, snowshoers (fishermen) and skiers that did not occur previously. There has been further parking congestion caused by the construction workers employed daily at the Redfish Lake Lodge. This past winter (2022) there were typically 2-4 construction trucks parked daily at this trailhead for the work that was being conducted at the lodge. The 2/04/2022 Special Use Authorization Amendment #3 and accompanying notification from the SNRA stipulated that use days will be limited at the Sawtooth huts because it creates parking congestion at Redfish Lake. While actual use at the Sawtooth huts has remained relatively static, all evidence shows that the increased parking congestion is caused by 3 factors: the SNRA rental of Redfish Cabin, increased day use, and winter construction projects permitted by the SNRA for Redfish Lake Lodge. Limiting use at the Sawtooth huts will not alleviate the winter parking congestion at Redfish Lake trailhead. Such restrictions will limit public access to the most historic and unique use of this trailhead.

Billy's Bridge: This trailhead is the access point for the Boulder Yurt and is also used for Nordic ski and snowshoe access on the Billy's Bridge trail network. There has been increased parking congestion here at times in the past few years, although it has not been a problem outside of busy holiday weekends. Once again, hut use data submitted to the SNRA on an annual basis show that hut use has not increased at the Boulder Yurts in the past few years, and in fact, Boulder Yurt use decreased for 2 of the past 3 years. Whereas North Valley trail pass sales in the past 2 years have increased by 30%.

The data clearly shows that hut use, both current and historic, is not the driving factor that has created parking congestion at winter trailheads. Yet the outfitter and the public who desire to use huts are being directly and negatively impacted by the SNRA's approach to addressing winter parking issues. Capping use days at the huts will not solve the growing parking issues. Requiring a small outfitter to construct and maintain new winter parking areas is unreasonable and unsustainable. Such new requirements will necessitate substantial increases in fees for the public using huts to cover the significant costs associated with building, maintaining, and plowing a winter trailhead. We encourage Ranger Flannigan to choose No Action on Design Element A18. We encourage the SNRA to work in partnership with the community to resolve the parking issues that we as a community are facing in the future in a meaningful and sustainable way."

#2 Resolution: Design Element A18 should be eliminated or adjusted. Shuttle services for winter hut users is unrealistic and ultimately a public safety hazard: There is no cell phone reception or other means of adequately communicating with the outside world from huts and the hazards related to the winter environment are far too great to expect people to wait for pre-arranged shuttles when/if plans change or unforeseen events or accidents occur. Wording in the Design Element A18 that refers to shuttle services should be removed or specifically amended to read "not required for winter overnight use". In addition: the statement "...proposals for plans to increase service days[hellip]" in A18 should be removed. It is reasonable to consider new parking plans for "New Authorized Activities" but not for existing historic activities, such as access to huts that have been occurring for over 40 years. Any increase in use day allotments for huts would be in the shoulder seasons and will not have any impact on the busier times when parking can be more congested. Ultimately, winter parking issues should be addressed holistically at the community level and should target the actual uses that have been clearly identified as causing increasing parking congestion, such as the SNRA Cabin use, Redfish Lake Lodge winter construction projects and increased day users at both Billy's Bridge and Redfish. The addition of new parking areas and potentially parking passes for all users should be considered before the Design Element A18 as worded is enacted.

#3 Objection: We requested "No Action" on Design Element A12 in our August 2022 Comments. Our concerns remain unchanged: Sawtooth Hut Use considered as "Wilderness Use" is fundamentally incorrect and should be removed from the OGMP as well as other concerns related to Wilderness Solitude and Wilderness Characteristics in the OGMP

From Page 9 of our August 2022 Comments:

"The OGMP defines all hut use in the Sawtooth as "Wilderness Use". This definition is fundamentally false. The Bench and Fishhook huts are outside the Wilderness boundary and only a fraction of use days occur in the Wilderness. We estimate that only 1/3rd of hut use days cross the Wilderness boundary. On a typical 3-day trip: Day 1 is spent outside the Wilderness accessing the hut, Day 2 often (but not always) involves a ski tour into the Wilderness, and Day 3 typically is focused on skiing back to the trailhead outside of the Wilderness. While an exact number of use days that access the Sawtooth Wilderness may be difficult to determine with current data, it is certain that not all use at the Sawtooth Huts is Wilderness Use and therefore it should not be categorized as such.

The definition of Sawtooth Hut use as Wilderness Use creates further limitations of attaining additional use to meet the capacity of the huts based on the A-12 and A-16 Design Elements. At our meeting with Susan James on 8/2/22, Ms. James made it clear that because of this Wilderness Use designation, there would be no additional use days allotted to these 2 huts and therefore these huts would never be allowed to be rented throughout the winter season. There is no evidence that there has been an adverse effect on Wilderness values or qualities in the 40-year history of these huts. It should also be noted that the Williams Peak Yurt, also on the edge of the Wilderness, has been and will continue to be rented every night of the operational season due to adequate use day allotment on that permit.

Wilderness Values, Solitude and the Huts

The OGMP makes a case that use at the Sawtooth huts has an adverse effect on "other users" ability to experience solitude. This concern is unfounded and hypothetical. It seems to create a problem where there is no evidence that there ever was or will be a problem with finding solitude because of hut use.

The 3 Sawtooth Huts were specifically sited, built, and permitted by the SNRA with the express purpose of providing access to the largely inaccessible Sawtooth Mountains in winter. The huts are there so that the public can find solitude. The area accessed by the public staying at the huts is naturally limited in scope and terrain. There is a clear historical use pattern of where people go (see Heinemeyer Study below). It is simple to find opportunities for winter solitude in the remaining 200,000+ acres in the Sawtooth Wilderness. The Boulder and White Cloud Wilderness areas offer another 150,000 acres of Wilderness without any huts and very limited human presence in winter. There is not a problem with finding solitude on the SNRA in the winter.

The OGMP specifically states that "The greatest effect is expected (to) be in the area of the three huts located adjacent to the Sawtooth Wilderness where one might normally seek opportunities for solitude." (pg84) The hypothetical "one" referred to in this statement would be foolish to follow an established ski track to a historic hut and expect to find total solitude. Instead, the hypothetical "one" would break their own trail into the vast untouched wilderness that surrounds them away from the 3 huts.

The plan continues to say that: "reduction in service days has the potential to limit the general public's ability to utilize huts, but it may benefit other users as the chance of interaction between groups may be less" (pg. 84) The hypothetical "other users" referred to in this statement are either hut renters who have every expectation to

potentially see another person or they are non-hut users following an established ski track to hut and can also expect to meet other people because of their choice in destination. There is no evidence of a problem with finding solitude or Wilderness Values in the Sawtooth Wilderness in the winter.

The reduction or limiting of use days does not resolve any problems associated with finding solitude or "wilderness values". The effect of capping use days at the Bench and Fishhook Huts, as the SNRA proposes, may reduce some group sizes by a couple people or it will deny access to the huts in the early or late season but it will not enhance Wilderness Values or opportunities for solitude in any perceptible way. Such an approach will inevitably create more problems by forcing users denied from staying in a hut to access other areas of the Wilderness.

These concerns seem especially odd in consideration of the actual use that occurs in the Sawtooth Wilderness in the summer compared to the winter. Actual use in the winter is dwarfed by the use and impacts that occur in the summer. It is especially odd considering the OGMP and EA is specifically creating a new additional pool of 22,000 use days, the majority of which are for uses in the Sawtooth Wilderness or accessing the Wilderness in the summer. This additional use day pool will create further problems with wilderness values and opportunities for solitude because there actually are crowding issues in the summer in the areas being permitted, Redfish Lake and the new use days associated with the shuttle being a prime example. "

A typical group size is 8-10 people/hut (16-20 people total), which may enter the Sawtooth Wilderness from the Huts in the winter months every 2-3 days. This is a low volume recreation experience, in remote, isolated locations, and does not impact other's opportunities to seek solitude, nor is there any evidence that the presence of the huts compromise any of the other Wilderness Characteristics.

#3 Resolutions: 1: Remove the language in the OGMP that refers to all use at the Sawtooth huts is Wilderness Use. 2: Apply Winter vs Summer designations for A12. 3: Develop evidence-based criteria that adequately evaluates impacts of winter hut use on Wilderness character and qualities, such as data from non-hut users in the existing hut areas adjacent to the Wilderness.

#4 Objection: Use is counted twice on any hut trip that employs a Guide, because the Hut Outfitter and the Guide Service must report the same use. This is problematic when applying for additional use from a limited pool, and with regard to the proposed limits on Wilderness use, because this method makes it appear that twice as many people are being served by the outfitters. This method does not accurately represent actual use on the Forest, and will make it difficult to obtain adequate use from a limited pool.

From Page 11 of our August 2022 comments:

"The current framework for counting use days on the SNRA results in double counting every use day on a guided hut trip. This is important because of the scarcity of use days being allotted to outfitters in general and to the huts in particular. Every use day matters under this scarcity model operated by the SNRA and every use day translates to the inability of a friend or family member being able to join a hut trip. Up until 5 years ago when the split in SVT and SVG occurred, use days were only counted once on a guided hut trip. Since that time, every use day is now counted twice as reported by each outfitter. On a typical 4-day guided trip to the Sawtooth huts with 10 people, the 40 use days reported 6 years ago have now multiplied to 80 use days today, even though the actual use is still only 40. This is the data that was used to evaluate the use day allotments for the OGMP and is inherently incorrect.

#4 Resolution: Apply use days to one outfitter on a guided hut trip.

5 Objection: Backcountry Huts are managed inconsistently on the SNRA.

From Page 4-6 of our August 2022 Comments:

"Permitting huts under an Outfitter and Guide Permit with associated use day allotments presents inherent challenges and is not typically used for huts on USFS lands. Sun Valley Trekking began over 40 years ago as both a "guide service" (guiding individuals on the Forest) and a "hut operation" (providing unguided hut rentals to the public). At the time of the original permitting by the SNRA, it may have been sensible to permit the operation under the "Outfitter and Guide" designation. While SVT was never permitted with enough use days to meet the capacity of the huts, throughout the first 35 years of SVT operations the SNRA always provided increased use days for hut rentals to meet the growing public demand. Under this approach, it was possible to use the Outfitter and Guide Permit model to sustainably meet the growing public need for huts.

In 2018, SVT sold the "guide service" and since that time solely rents huts to the public. In the past 5 years, the SNRA management of the SVT permit changed from viewing use days as a "basement not a ceiling" (a frequent statement by the 25-year permit administrator at the SNRA, Ed Cannady) to a model that views use days as a scarce resource. This self-imposed scarcity of use days by the SNRA has proven to be an inadequate approach to permitting the huts. It is inadequate because it has created a framework that does not permit enough use days to meet the clear future public need nor the seasonal capacity of these historic structures. It often feels as if the SNRA is hammering the square peg of "Huts" into the round hole of the "Outfitter and Guide" permits and the associated scarcity of use days.

Examples of Hut Systems Managed Outside a User Day Model

Many hut systems on the USFS do not operate with a User Day model or Use Day limits. Huts are commonly permitted to allow for rentals every night of the operational season. Examples of this model include: Galena Lodge Yurts and the Redfish Cabin (both permitted on the SNRA), Idaho Parks and Recreation Yurts (on the Boise National Forest), and 10th Mountain Division Huts (on the White River National Forest) - the largest hut system in the country with an estimated 132,000 annual user days. Each of these hut systems, locally and regionally, can serve as a model of how huts are permitted outside of the user day system with great benefit to the environment and the public.

Examples of Hut Management on the SNRA

The SNRA began renting its own Redfish Cabin in recent years to the public. Unlike the Bench and Fishhook huts, located 2-4 miles away in the same drainage, there are no use day limits applied to this hut. As far as we are aware, there was no Public Scoping of this new use and no Environmental Analysis completed. As the longest running winter commercial use of this area, SVT was never notified of the new hut being rented to the public. We became aware of this new use by the SNRA when parking congestion became a problem at the trailhead (please see discussion later). This new use of the Redfish Cabin appears to be a double standard for permitting and regulating huts in the Redfish drainage. The SVT Huts are managed under strict use day limits, permit regulations and NEPA protocols while the Redfish Cabin appears to be able to operate outside of those rules for what is basically the same use: renting a hut to the public for overnight recreational use in the backcountry of the SNRA.

The SNRA currently administers 3 other special use permits for huts. Each permit is set up differently and has distinctly different effects on the permit holder and the public. Galena Lodge operates 4 yurts on a "Ski Area Permit" and has no limits to use days for the yurts. The Galena Yurts can and are rented nightly throughout the operational season(s). Sawtooth Mountain Guides (SMG) operates under an "Outfitter and Guide Permit" like SVT with 2 distinct differences: SMG also operates a guide service and SMG only operates one hut. SMG has rented the Williams Peak Yurt at full capacity for many years and has had enough SNRA authorized use days to

allow for this long-established use. Of all the huts permitted on the SNRA, only the SVT huts are permitted in a way that limits use below seasonal capacity.

The SNRA's approach to managing the SVT permit is inconsistent with how the SNRA manages other huts and does not meet the clearly defined public need identified in the Needs Assessment and in the public comment given during the OGMP process. This approach results in reducing capacity to meet a clearly defined public need in existing and otherwise operational huts. This approach has the consequence of pushing the public to day-use areas of the Forest that are experiencing crowding problems or to camp unregulated on the Forest because they do not have access to the huts. This approach is ultimately detrimental to our community, both natural and human. To reiterate: there is no evidence of a detrimental social or environmental impact of the 40-year use of these huts. Given the fact that the SNRA has defined a clear public need for "an expansion of the backcountry hut system" and there is no evidence of a social or environmental conflict it is odd that the SVT huts are the only huts on the SNRA which are permitted below the seasonal capacity. We don't understand why this is the case.

Recommended Long Term Approach

We request that the SNRA reexamine the role SVT huts play on the Sawtooth Forest and to both recognize and utilize huts as a beneficial management tool. Recognizing that SVMH no longer provides guide services, we suggest two alternatives based on how other hut systems are currently managed on USFS Lands:

1: Issue a revised permit to SVMH that does not apply a cap on User Days as per 10th Mountain Division Huts, Idaho Parks and Recreation Yurts or Galena Lodge Yurts.

2: Allot enough User Days to each hut for its operational season- as per Sawtooth Mountain Guides

A failure to restructure the SVMH permit will result in the annual application for additional use days to meet the growing public need or simply the denial to the public the use of existing huts. This is a pattern that we have been engaged with for over 12 years that has become acutely worse in the past 3 years with the change in SNRA management of the SVT permit. We respectfully request that the SNRA develops an Alternative Plan in a revised EA that manages huts consistently on the SNRA and in line with the Public Need as identified."

#5 Resolution: Develop a plan on the SNRA which manages huts consistently providing adequate use days to accommodate the Operation Season or eliminate use days for huts and define Use by season and capacity as per current management of the Galena Lodge Yurts or Redfish Cabin.

Alternatively: Create a separate Pool in the OGMP that accommodates full capacity during the Operating Season for the 4 huts on the SNRA that are currently managed under a Priority Use Day Allotment.

#6 Objection: Request the 2021 Actual Use Numbers be utilized for Sun Valley Guides in the Initial Priority Use Allocation Increase.

From Page 14 of our August 2022 Comments:

"As the previous owners of the operation which is now Sun Valley Guides (SVG), we have concerns with how the OGMP will affect this operation and the public that uses its services. If we understand the plan correctly, SVG will not receive any additional use days in the initial allocation under any of the proposed actions. If we understand correctly, the OGMP will at best allow a 15% increase in Priority Use Days every 5 years. Because SVG currently has 1000 priority use days this translates to an additional 150 use days every 5 years. This simply is not adequate to maintain a viable guide business without substantially increasing prices. Such a model will

lead to less accessibility to the public for professional guide services and will make skiing with a guide only for the wealthy few.

The use day allotment proposed in the OGMP also does not meet the needs identified in the Needs Assessment which identified guided skiing as a "high need". How does capping use days for SVG at 1000 effectively meet the high need for ski guide services? In 2021, SVG operated at close to 2000 service days with temporary authorization. There were no conflicts or problems identified with this level of use. The actual use that occurred in 2021 under the SVG permit was not used for the Alternative B, so while this use occurred, it is not being allowed as a basis for the initial allocation. This seems counterproductive to the needs of our community and the SNRA.

We ask that the 2021 actual use numbers be incorporated into the Alternative B initial allocation process for SVG."

#6 Resolution: Utilize actual use numbers for 2021 for Sun Valley Guides permit in the Initial Priority Use Allocation Increase with a recognition that 2020 was an exception and atypical winter season because of the hardship associated with the business shutting down due to the Covid 19 pandemic. Comparing the 2020 use with the 2021 use shows the high public need for ski guiding services historically, currently and in the immediate future. The SNRA should utilize 2021 use numbers for the SVG Initial Priority Use Allocation Increase. The SVG permit is unique among all of the permits administered by the SNRA and cannot adequately meet the public need with 2016-20 use day numbers.

#7 Objection: The OGMP represents an unnecessary constraint of trade on a important sector of our economy and community.

From Page 14 of our August 2022 Comments:

"The OGMP, by design, focuses on creating new regulations for outfitters and guides. The effects of these new rules will have a significant impact on these operations. Outfitters are small local businesses who serve the public that desire experiences on public lands. Outfitters are businesses that create employment and directly support many aspects of the local economy. Outfitters support guides. The Wood River Valley and Stanley are home to one of the most skilled and unique community of guides in the nation[hellip]Almost all the professional mountain guides who work here live here, and many were born here. This is not normal. The mountain guide profession often requires a transient lifestyle to support, traveling mountain ranges around the world to support a living. We are incredibly fortunate that we have both the resource (mountains, huts, wildlands, world class skiing, trekking, climbing) and a community who value the expertise and professionalism of guides. This combination of factors has created a microcosm of guides and guiding that is largely unique in our country. The guides who work here own homes, their children go to local schools, they have dedicated their lives to our mountains and our community and are here for the long term. They are an incredible resource with an exceptional level of 1st hand experience and knowledge about the SNRA. They are the voice that interprets the SNRA for the public and teaches people how to travel lightly and care for the resource. They are the ones that educate the public, establish best practices on the land and help when there is an accident. This unique community of guides should be acknowledged, valued and supported by the SNRA by working in partnership with outfitters and guides to meet the future needs of the SNRA. The plan as written, will stifle the guiding culture here by placing unnecessary limits on guiding. The result will be to make the profession of guiding less sustainable here, pushing guides out of their craft or out of the community. This would be a disservice to our future as a community and to our natural resource. "

The OGMP and Draft Final Decision provide no evidence as to why unnecessary limits on outfitting benefit the natural resources or the people recreating on the SNRA. No Capacity Analysis has been completed. Unnecessary limits on outfitting and guiding, when there is no evidence of environmental or social conflict from

outfitted activities, will harm small businesses, the local economy, deny access to professional services, decrease safety and education, and exacerbate social and environmental problems.

#7 Resolutions: 1: Utilize actual use numbers for 2021 for Sun Valley Guides permit with a recognition that this permit is unique among all of the permits administered by the SNRA and cannot adequately meet the public need with 2016-20 use day numbers. 2: Develop an alternative management plan to create consistency for how huts are managed on the SNRA, without use day caps or via seasons of use, and allow consistency of this use for the future.

Thank you very much for the opportunity to provide Objections and Resolutions to this very important Draft Decision. We would like to meet with the Reviewing Officer at a mutually convenient time to discuss the concerns outlined above. Please apprise us in writing, via email: info@svtrek.com , of any response to these objections or of any further opportunities to provide comment or of any other decisions.

Sincerely,

Joe St.Onge, Lead Objector

Sun Valley Trekking

www.svtrek.com