Data Submitted (UTC 11): 2/24/2023 7:00:00 AM
First name: AARON
Last name: LIEBERMAN
Organization: Idaho Outfitters and Guides Association
Title: EXECUTIVE DIRECTOR
Comments: February 24, 2023Objection Reviewing Officer Intermountain Regional Office 324 25th Street Ogden, UT 84401Submitted via email to objections-intermtn-regional-office@usda.govRe: Sawtooth National Recreation Area Outfitter and Guide Management Plan ObjectionSubmitted Electronically February 24, 2023, at: objections-intermtn-regional-office@usda.gov Cc: **PII REDACTED**OBJECTOR CONTACT INFORMATIONName:Pursuant to 36 C.F.R. [sect] 219.54 (c)(3) Aaron Lieberman of the Idaho Outfitters & Guides Association (IOGA) is designated as the lead objector.Objector:Idaho Outfitters & Guides AssociationAaron LiebermanExecutive Director**PII REDACTED**[middot]Name of project being objected to:[middot]Idaho Outfitter-Guide Management PlanName & Title of Responsible Official:Jake Strohmeyer, Sawtooth National Forest Supervisor[middot]Location[mdash]National forest/ranger district where project is located:[middot]USDA Forest Service Sawtooth National Forest (Blaine, Boise, Custer, Elmore Counties)NOTICE OF OBJECTIONThe Idaho Outfitters & Guides Association (IOGA) 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.ELIGIBILITY TO OBJECTThe Objectors have participated in the development of this proposed OGMP from the outset, beginning with the Needs Assessment and submitting substantive formal comments on the Proposed Action and Draft Alternative.See attached copies of substantive comment previously submitted as well as other referenced documents:[bull]Final Comments for Scoping Proposed Action on Sawtooth National Recreation Area Outfitter and GuideManagement Plan (May 10, 2021)[bull]IOGA Comments Supplement for SNRA OGMP 8_31 (August 31, 2022)[bull]Referenced DocumentsoSNRA Outfitter QuestionnaireoOutfitter & Guide Needs Assessment Worksheeto05. OGLB Comments SNRA OGMP - 8-31-22oMOU Between USFS, BLM, and OGLBoID Commerce Objections to USFSIDPR Objection Outfitters DN-FONSI 2023.02.24IOGA | Objection Sawtooth National Recreation Area Outfitter and Guide Management PlanINTRODUCTIONTo start, we would like to thank the SNRA staff and Area Ranger, Kirk Flannigan, for the presentations and materials you have developed around the Needs Assessment, the Scoping Action, the Draft Alternative B[mdash] as well as for your time, energies, and ongoing willingness to meet with and engage the industry in partnership around these areas of shared interest.This letter presents the objections of the Idaho Outfitters and Guides Association (IOGA) regarding the Sawtooth National Recreation Area Outfitter and Guide Management Plan. Please include these comments and any materials or exhibits submitted with these comments as part of the administrative record for this Forest Plan action. Additionally, we hope you will consider the limited objections and remedies we have enumerated and provide IOGA, as well as our supporting State partners, Idaho Department of Parks and Recreation and Idaho Department of Commerce, the opportunity to meet and discuss possible resolution to our objections.The CommenterThe Idaho Outfitters & Guides Association (IOGA) is a nonprofit business trade Association established in 1954 in Salmon, ID, representing most all of the licensed outfitters that are special use permitted by the Sawtooth National Recreation Area (SNRA) to provide services to the recreating public. These outfitters serve thousands of forest visitors (annually) through facilitating their recreation experiences, use and enjoyment of the recreation resources, and opportunities provided and managed by the SNRA. We thus have a deep interest in and are affected directly by the Forest Planning process overall, and in the Sawtooth National Recreation Area Outfitter and Guide Management Plan. Provisions of the plan will directly affect outfitter and guide authorizations and our ability to provide services to the public who desire a guided visit on lands and waters managed by the SNRA.SummarySawtooth National Recreation Area - Resources, Trends, ManagementThe SNRA is home to a wide variety of guided activities ranging from snowmobile tours, backcountry skiing, trekking, fishing, rafting, guided hunts, horseback rides near Redfish Lake and many more. The USFS has the difficult task of managing the public land within the SNRA. Their key objectives are to protect the resource for future generations while also stewarding one of Idaho's greatest commodities: outdoor recreation.Changing conditions, patterns of use, management tools, and resource designations (and more factors besides) have made the task of effectively managing the SNRA a difficult one[mdash]and we applaud the

SNRA for all they have done and continue to do for the resource, the public, our communities, and our industry.Anecdotal experience from individuals who live and work on/near the SNRA as well as academic analysis affirms that public visitation and recreation on the SNRA has increased over time. This is especially true in certain areas (compartments) of the SNRA, such as the east side of the Sawtooth Wilderness. However, it is testament to both the SNRA line officers and SNRA outfitters and guides, as partners, that while visitor use in such areas has increased, [recent] available data suggests that visitors to the SNRA (viz., Sawtooth Wilderness) continue to express high to very high satisfaction with their trip (not feeling crowded, parking availability, feeling safe, and trail conditions, etc.),i and that this increased use (at least in the Wilderness) has not necessarily correlated with undue detrimental resource impacts.iiThe Role, Value and Needs of Outfitters & GuidesRoleAs the population and participation in outdoor recreation increases, the need for guided services becomes more necessary than ever. Outfitters play a significant role in education, employment, stewardship, field reporting and agency support, and are essential to the rural economies where they operate.ValueOutfitters and guides are first and foremost stewards of the areas in which they operate; they clear trails, improve access, practice leave-no-trace and limited impact principles. Outfitters and guides are educators, recognizing and demonstrating historic land use practice and proper land ethic, humane treatment of stock and respect for wildlife, backcountry safety and responsibility. Outfitters and guides are bonders, passing along traditional forest uses such as hunting, fishing, boating, equestrian activities, and carrying forward the ethos of our state, wild places, and adventure. Outfitters and guides are galvanizers, inspiring and maintaining an advocacy base for our public lands. Outfitters and guides are economic multipliers, generating critical revenue and activity for the small communities they base out of. Outfitters and Guides are partners, supporting the resources (and management of them) through fees and in-kind support, teaching and promoting safety on the resource, assisting in search and rescue missions, and striving to provide the best possible services to the public[mdash]all the while being strictly regulated and held accountable by the USFS and other management authorities.NeedsThe needs of outfitters and guides are few and fundamental. They need a base profit margin to maintain viability; healthy fish/wildlife habitat and populations, and clean, free-flowing streams; appropriate access; reasonable rules and regulation, and reasonable predictability for their businesses/profession to sustain and grow.The US Forest Service acknowledges the importance of this role and these values in various guiding documents.? Section 41.53b of the Final Directives for Forest Service Outfitting and Guiding Special Use Permits identifies the following objectives for outfitting and guiding:1. Provide for outfitting and guiding services that address concerns of public health and safety and that foster successful small businesses consistent with the applicable land management plan.2. Facilitate greater participation in the outfitting and guiding program by organizations and businesses that work with youth and educational groups.3. Encourage skilled and experienced individuals and entities to conduct outfitting and guiding activities in a manner that protects environmental resources and ensures that national forest visitors receive high-quality services.? The aforementioned (2008) final directives provide additional perspective in support of the role and value of outfitters and guides on lands managed by the USFS in describing the Background and Need for said final directives, stating:"Outfitting and guiding conducted on National Forest System lands have become one of the chief means for the recreating public to experience the outdoors...The agency anticipates that outfitting and guiding will increase in importance as the public's desire for use of Federal lands increases and as the agency encourages use by increasingly diverse and urban populations, many of whom may lack the equipment and skills necessary in the outdoors. Therefore, agency policy needs to reflect the public's demand for services while incorporating standard business practices and sustaining the natural environment in which these activities occur."iii iv? The Congressional Research Service's 2020 Report on Guides and Outfitters on Federal Lands places particular emphasis on the economic significance of outfitting and guiding in rural economies, noting:"The guide and outfitter industry is of particular importance to the economies of rural communities across the country. Many commercial guides and outfitters operate in rural areas and gateway communities.v These operators provide economic opportunity in communities where tourism may be a job-creating industry.vi Guide and outfitter businesses located in these communities may rely heavily on access to federal lands to execute their work and provide services to clients." viiNotwithstanding the recognition by the USFS and Congress of both the broader trends of increased participation (and service needs) in outdoor recreation activities on USFS managed lands and the important role that outfitters and guides play as partners, stewards, educators, and economic drivers in rural economies, and; whereas the IOGA recognizes and

appreciates the degree to which the SNRA has incorporated previous comment into the Draft Alternative B, and comment on Draft Alternative B into this Draft Final Decision and Final EA, and; whereas we recognize the need for, and benefits of, this action; we remain concerned by certain elements of the Final EA and Draft Decision, in particular those that may effectively cap or restrict subsets of the recreating public (the outfitted public), or otherwise stand redundant (and unnecessarily additive) to existent management plan(s) and direction.STATEMENT OF REASONS AND PROPOSED REMEDIESTopic Area: Geographic CompartmentsThe proposed Plan divides the Sawtooth NRA into eight geographic areas or compartments that are color coded red, yellow, or green (Table 10). The compartments ostensibly reflect specific areas where the types and levels of recreational use, management constraints, and resource concerns are similar. Each compartment has generalized objectives for the implementation of authorizations in the future. These geographic compartments characterize the different areas by color[mdash]red, yellow, and green[mdash]which denote relative degrees of use/management constraints/resource concerns: red for high use/constraints/concerns; yellow with moderate use/constraints/concerns; green with low use/constraints/concerns.Objection #1As previously commented upon (8.31.22 Comments re: OGMP Draft Alt, page 4; Final Comments for Scoping Proposed Action on Sawtooth National Recreation Area Outfitter and Guide Management Plan, page 5), a general objection that we have with the geographic compartments and their characterizations is that they do not recognize (or reflect) the varying Recreation Opportunity Spectrums (ROS) with said compartments. The Sawtooth Forest Management Plan clearly outlines the differences in ROS in Appendix F of said plan (copied below in endnote).ix The "red, yellow, green" compartments make no recognition of the differences in these plans. This use designation in the Wilderness plans should not be ignored or superseded, or else layered onto with this OGMP with additional stipulations.Remedy #1Below we will outline specific changes (remedies) we request be incorporated into the final decision, copying text from the Draft Environmental Assessment for context and breaking out specific comments by compartment.Red CompartmentPage 18 of the Draft Environmental Assessment states:Red identifies areas where the overall recreational use is high, the current number and diversity of special uses (organization camps, resorts, recreation events, recreation residences, and non-commercial group use) is high, outfitter and guide opportunities are many and diverse, and additional recreation use may result in conflicts or natural resource concerns that cannot be mitigated. Red areas may also have moderate to high natural resource concerns; these can include sanitation, road and trail sustainability, or potential for disturbance to wildlife and habitat. Red areas may not have capacity for an increase in guided use. Red compartments include Sawtooth East and the Wood River Drainage. The Down River compartment was also identified as a red compartment but is not covered in this proposed action. Red compartments include portions of the Sawtooth Wilderness. Emphasis will be placed on outfitter and guide activities that are in line with wilderness management objectives and enhance wilderness character, fill a specific niche, or provide an opportunity that does not currently exist. Proposals to increase existing use, or add additional activities, may be limited, and proposal may be denied in the absence of realistic mitigations to address an identified issue. Authorized activities will be carefully monitored to ensure that natural and social resource thresholds are met. Careful consideration will be taken to maintain wilderness character.To address this issue/objection, Wilderness should be separated from other compartments. Wilderness has its own ROS, Primitive, its own plan with monitoring, indicators, and thresholds already established in the respective applicable plans. Wilderness is wilderness, not to be combined or interlaced with Motorized, Roaded, and Rural ROS. The Agency already has direction in and must adhere to the Wilderness plans already scoped and in place, including the indicators, standards, and monitoring set up to manage these areas.Specifically, barring removal of the additional compartmental stipulations, the language should be modified as follows (in line with drawing from scoped alternatives, including reverting specific elements to the existent 'no action'):"Red identifies areas where the overall recreational use is high, the current number and diversity of special uses (organization camps, resorts, recreation events, recreation residences, and non-commercial group use) is high, outfitter and guide opportunities are many and diverse, and additional recreation use may result in conflicts or natural resource concerns that should cannot be mitigated. Red areas may also have moderate to high natural resource concerns; these can include sanitation, road and trail sustainability, or potential for disturbance to wildlife and habitat. Red areas may not have capacity for an increase in guided use when considering the indicators and standards."The above description of the red compartment fits the ROS Motorized, Roaded and Rural Class Descriptions where many of the Outfitted activities take place. The public's expectation

of their recreation experience matches with that ROS. Any additional use days should be considered based on the ROS Class Description and the conditions represented in that ROS. ixYellow CompartmentPage 18 of the Draft Environmental Assessment states:Yellow identifies areas where recreation use may not be as high as in red compartments, but the overall use is increasing, demand for outfitter and guide services is stable or increasing, recreational use levels are changing, and management constraints and potential resource concerns may be limiting factors. Yellow areas may have moderate to high or seasonally specific natural resource concerns. Some resources such as sensitive plants, fish, or wildlife may be affected by increased use if not properly mitigated. Some areas within yellow compartments may not have capacity for more use while other areas may be able to sustain additional use.Yellow compartments include portions of the Sawtooth Wilderness, and all of the Cecil D. Andrus White Cloud and Hemingway-Boulders wilderness areas. The Hemingway-Boulders Wilderness in particular, has a low level of human use and disturbance and a high degree of natural integrity. Careful consideration will be taken to retain wilderness character of each wilderness area. An emphasis will be placed on outfitter and guide activities that enhance wilderness character, avoid resource areas of concern, fill a niche, or provide an opportunity that does not currently exist. A broad spectrum of activities may be considered. Proposals for additional activities, and increased use will be carefully reviewed. Additional or new authorized service days will tend to be small in number, authorized incrementally, and monitored carefully for change to ensure that resource and social thresholds are met.Here again, to address the issue/objection, Wilderness should be separated from other compartments. Wilderness has its own ROS, Primitive, its own plan with monitoring, indicators, and thresholds already established in the respective applicable plans. Wilderness is wilderness, not to be combined or interlaced with Motorized, Roaded, and Rural ROS. The Agency already has direction in and must adhere to the Wilderness plans already scoped and in place, including the indicators, standards, and monitoring set up to manage these areas.Topic Area: Design Elements (10,12,16,18)Objection #2: Design Elements in General[Previously addressed in 8.31.22 Comments re: OGMP Draft Alt, page 5-6; Final Comments for Scoping Proposed Action on Sawtooth National Recreation Area Outfitter and Guide Management Plan, page 5]While our substantive/detailed objections and proposed remedies for this section are outlined below, a broader concern worth noting is that the Design Elements included in this OGMP do not follow from or reflect the findings of a capacity analysis[mdash]hence, while they may be informed by overlapping specialist reports, they do not reflect a comprehensive analysis of all use and sources of use nor the combined capacity acceptable in the respective Compartments and expressed by said Design Elements. (C. Phillipe speaks to this concern well in her 2020 scholarly article, Wilderness Recreation Trends and Impacts: A Case Study of the Sawtooth Wilderness: x)We recognize it is not without precedent or otherwise outside USFS policy to not conduct a capacity analysis when undertaking management actions such as this; USFS policy gives significant latitude to line officers regarding such processes and requirements. More to the point, it is poor practice to establish restrictive or
limiting design elements on a particular area or activity, etc., without an accompanying and substantive capacity analysis detailing how and why additional or new restrictions on one user group will meaningfully address objectives and concerns.If the OGMP is based on data that identifies resource impacts that are distinctly attributable to the outfitted public's behavior and/or visitation[mdash]or otherwise solved by the limitation thereof[mdash]it has not been presented to us. The EA does include specialist reports on Wildlife, Wilderness, and Recreation. These are not, however, the same as a capacity analysis, without which a number of the 'additively limiting' (i.e., beyond what exists currently in plan) Design Elements[mdash]specific to the outfitted public[mdash]may not be necessary or in fact supportive of overarching desired conditions and objectives.Remedy #2A remedy to the objection outlined above would be to remove particular design elements in the OGMP that impose restrictions or threshold-based triggers until such time as the SNRA is able to conduct a comprehensive capacity analysis that factors and weighs relative anticipated impacts of outfitted activities in relation and proportion to non-outfitted activities. Specifically, we request the following changes related to Design Elements as resolution:[bull] A07 - No Action[bull] A13 - No Action[bull] A14 - No Action[bull] A17- No Action[bull] A18 - No ActionObjection #3. a: Needs Assessment Results vis-[agrave]-vis Design ElementsIn the section of the OGMP that addresses the Needs Assessment, it is states on page 82:"These design elements and others were developed in response to common concerns or comments received in response to the needs assessment questionnaire and/or during scoping for the proposed action. They also reflect common permittee and partner

complaints and concerns brought to the Sawtooth NRA staff in phone calls or emails."We object to the OGMP's substantiation of any given restrictive Design Elements ostensibly based on public responses to the Needs Assessment insofar as:[bull] the Needs Assessment itself kicked this process off from a fundamentally skewed foundation in that a number of the questions were framed in the negative. Any student of practitioner of social scientific research knows how significant eliminating possible confirmation bias is in survey design. Some examples:o Are there places where you think there is excessive use/crowding? Where and when?o Do you feel places you visit are excessively damaged by use? Please provide examples.o Are there any areas or times of year that you feel are not appropriate for outfitting and guiding? Where and why?o Are there areas where you are concerned about the amount of guided use?o Are there areas you no longer visit because of the presence of guided use?[bull] despite this somewhat biased survey design, responses were overwhelmingly in favor of not just the existing levels of outfitted services but also generally of increased guided and outfitted services to the recreating public, with a minority response saying that there should be limited or decreased guided public use in particular areas on the SNRA (we have included a table below that scores survey question responses based on our independent and exhaustive review), and;[bull] overall, the OGMP's characterization of the responses to[mdash]and findings of[mdash]the Needs Assessment, while to some degree necessarily subjective, misrepresents the degree of support vs concern for existent and new/additional outfitted services on the NRA and should therefore not be used to substantiate the imposition of effectively restrictive or otherwise limiting Design Elements.<PICTURE: FIGURE 1 - IOGA NEEDS ASSESSMENT SUMMARY RESULTS, PG. 8>Remedy #3. a: Needs Assessment Results and Proposed Action[Previously addressed in 8.31.22 Comments re: OGMP Draft Alt]Our proposed remedy to the objection outlined above would be to remove (or revert to No Action) particular design elements in the OGMP that impose restrictions or threshold-based triggers until such time as the SNRA is able to conduct a comprehensive capacity analysis that factors and weighs relative anticipated impacts of outfitted activities in relation and proportion to non-outfitted activities[mdash]specifically: A07, A13, A14, A17, A18.Objection #3. b - Sawtooth Hut Use Counted as All Wilderness Use[Previously addressed in 8.31.22 Comments re: OGMP Draft Alt, page 7]The general objection raised above is particularly salient for this OGMP as regards particular activities occurring near or adjacent to wilderness. For instance, the EA states on page 79:"Outfitter and guide use on the Sawtooth NRA is a relatively small number (21,000 outfitter and guide service days) in comparison to the 585,400 forest visitor days identified in the NVUM. In some areas and during some periods of time, however, outfitter provided activities comprise the majority of use. Examples include day use trail rides at Redfish Lake and Galena Lodge, skiing from backcountry huts in the wilderness, and hunting from remotely located camps."Notwithstanding this claim quoted above, as an example, the SNRA has acknowledged they do not have backcountry hut use numbers for the non-outfitted public with which to inform the assertion framed above. The USFS should not suggest that use in the form of "skiing from backcountry huts in the wilderness" is predominately outfitted without non-outfitted use numbers. Further on this example, for three of the four winter huts on the Sawtooth NRA, the OGMP considers all outfitted public hut use as occurring in the wilderness, despite the fact that there is not differentiated use data nor analysis to support as much and despite the fact that the three huts in question are not in but adjacent to wilderness. The Bench and Fishhook huts are outside the Wilderness boundary and only a fraction of use days occur in the Wilderness. It is our understanding based on conversations with outfitter members that perhaps one-third of hut use days cross the Wilderness boundary. This last is particularly problematic when combined with the above design elements that would restrict any new priority use or severely limit short-term priority use in wilderness. It is both improper and inaccurate to base management decisions on supposition or conflation.Remedy #3. bFirst, strike language and any other criteria in the OGMP that refers to any-and-all use at the Sawtooth huts as Wilderness Use. Second, remove language that conflates outfitted and non-outfitted public hut use (esp. restrictions based on such conflations) until and unless distinct, verifiable analysis and data is available to substantiate management action/criteria.Objection #4: Design Element 10[Previously addressed in 8.31.22 Comments re: OGMP Draft Alt, page 5-6]Restricting new or additional outfitted use/opportunities in mapped 'Areas of Concern" (for wolverine and mountain goats during winter/spring. Dec. 1 - June 30) is not justifiable absent actual, verifiable use and impact data for all user groups. As the EA itself acknowledges, outfitted public use represent a fraction (2-4%) of the total estimated use on the NRA. Restricting one subgroup of the public without supporting data is arguably discriminatory and at best ineffectual.Remedy #4: Design Element 10Revert to the No Action

alternative.Objection #5: Design Element A18[Previously addressed in 8.31.22 Comments re: OGMP Draft Alt, page 5-6]Design Element A18 would put an additional, undue burden on outfitter permittees for comparatively marginal potential increases in use/clients. The prospective impacts on permittees and outfitted public are not meaningfully acknowledged or accounted for. The issue this design element sets out to address is real (parking and congestion at access areas), however, a real solution relies on broader actions than this requirement would accomplish.Remedy #5: Design Element A18This Design Element should be adjusted or eliminated. As other Objectors have noted, it may arguably be reasonable to require new parking/shuttle plans for "New Authorized Activities" but not for existing historic activities, such as access to existing huts.Objection #6: Historic Use Calculations and Undue Impact in Particular CasesAs addressed in IOGA's 2021 comment for scoping Proposed Action (Final Comments for Scoping Proposed Action on Sawtooth National Recreation Area Outfitter and Guide Management Plan), the OGMP does not reflect the historic use, or viable use, numbers for certain operators (viz., Sun Valley Guides) nor reflect the public desires/demands presented by the 2019 Needs Assessments for such services. As other commenters noted: "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. "Remedy #6: Historic Use Calculations in Particular Cases and Undue ImpactUtilize 2021 actual use numbers for Sun Valley Guides permit with a recognition that 2020 was an exception and atypical winter season because of the hardship associated with the business shutting down because of the Covid 19 pandemic. There is notably a very demonstrated high need for these services, evidenced by comparing the 2020 use with the 2021 use, and the SNRA should make an exception for this outfitter. 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.Topic Area: Indicators and Monitoring[Previously addressed in IOGA Comments Supplement for SNRA OGMP 8_31, page 8]The OGMP includes Indicators and Monitoring (Table 4, Page 18; Table 12., page 26) that stand to apply to Management Actions vis-[agrave]-vis outfitted public use and proposals. As noted in our comments submitted re: the Draft Alternative, the OGMP creates confusion and potential conflicting direction by mixing and matching thresholds and indicators from existing management plans. The combination of these varying thresholds ignores the ROS and wilderness class of specific areas within each forest plan.Additionally, the OGMP fails to address how personnel are to distinguish (let alone monitor) impacts associated with use by the outfitted versus non-outfitted public. Increases in non-outfitted public use and impacts stand to trigger strict limits or even reductions to outfitted public use. This causal relationship is clearly problematic on principle as well as in terms of practical effect.Objection #7: Wilderness Character Indicators and Monitoring[Previously addressed in IOGA Comments Supplement for SNRA OGMP 8_31, page 8]Each wilderness plan already includes these elements (identified in thresholds); moreover, it is only appropriate that an outfitter and guide specific plan only include the activities and assigned sites of the Outfitters. Outfitters have no control over the impacts of the non-outfitted public.Remedy #7: Wilderness Character Indicators and MonitoringThe existing wilderness management plans and respective thresholds should be used for the indicator 'Wilderness Character.' Short of that, the OGMP should clarify in detail how USFS personnel will distinguish and quantify impacts attributable to the outfitted public versus the non-outfitted public.Objection #8: Recreation Experience Indicators and Monitoring[Previously addressed in IOGA Comments Supplement for SNRA OGMP 8_31, page 8]1. Regarding the identified threshold "increasing conflicts between public and guided recreational use," the outfitted public is the public. Many outfitters provide access to, and experience with, our public lands and
wilderness for individuals who otherwise would not be able to do so by themselves, whether due to disability, lack of knowledge/confidence, etc. Are these individuals any less members of the public than those who do not utilize the services of an outfitter? 2. Regarding potential management action: "Evaluate levels of outfitter and guide use in areas where thresholds are more than established limits. Consider placing limitations on outfitter and guide use or activities that contribute to exceeding identified thresholds." If use by the outfitted public stays the same in a given area but use by the non-outfitted public increases two-fold, this proposed Management Action would

direct USFS personnel to first consider limiting the non-causal variable.Remedy #8: Recreation Experience Indicators and MonitoringThe existing management plans and respective thresholds should be used for the indicator. Short of that, the management action should at the very least be changed such that limitations or restrictions are not the first and only solutions provided to USFS personnel.General Comments on Process (Not Substantive Objections)The Outfitted PublicThe single most common[mdash]and perhaps significant[mdash]concern identified by outfitters has to do with the 'capping' or, in particular cases the procedural restriction, of use by the outfitted public separately from and independent of the non-outfitted public. The basis of this concern is: first, that whether relative to resource, biophysical capacity, access (etc.) the outfitted public is part of the publicviii, and; second, that most all of the use/recreation on the SNRA comes from the non-guided public (outfitted use on the SNRA represents between 2.5% to 3.5% of total use according to figures drawn from the EA). The false distinction between outfitted public and non-outfitted public remains present in this iteration of the plan, to wit, from page 2 of the Decision Notice:"Further, Alternative B provides a large landscape for outfitter and guides to operate in but also provides areas where the public can roam without guided activities, potentially reducing conflict and preserving that sense of place for those visiting the area."IOGA recognizes that this plan bears specifically on commercial outfitters. We also recognize that the SNRA has myriad, overlapping responsibilities and is attempting[mdash]via this action[mdash]to provide a means to "provide clear and consistent direction for administration of the outfitter and guide program, as an aid in making decisions related to outfitter/guide services, to better facilitate timely responses to outfitter and guide requests, and to be compliant with national and forest plan direction."However, the Plan contains components (viz., Design Elements) that go beyond the limits already established in management plans, applying only to the outfitted public, which given the limited comparative use by the outfitted public do not stand to meaningfully contribute toward broader Forest objectives[mdash]"[hellip]to assure the preservation and protection of the natural, scenic, historic, pastoral and fish and wildlife values and to provide for the enhancement of the recreation values associated therewith[hellip]".As aforementioned, we would like to discuss how to resolve our concerns with what we consider to be more restrictive elements of the Plan that remain present.Summary & RequestThe Idaho Outfitters & Guides Association[mdash]on behalf of our many members[mdash]has been involved from the very outset of this process, from the Needs Assessment through this Draft Final Decision and Final EA.It has been an at times frustrating and difficult process, but one that we hope will result in something positive for our industry, our USFS partners on the NRA, for the recreating public, and for our surrounding community.To that end, we would like to acknowledge the degree to which the leadership on the SNRA and Forest Supervisor Strohmeyer have listened to industry concerns and incorporated industry comments and suggestions into the OGMP. Thank you for your efforts to improve on this OGMP, for your support of our industry and individual permittees, for your ongoing partnership, and for your consideration of our concerns expressed in these objections. We recognize the good intentions and good faith behind your actions and hope you will, in turn, see the good intentions and good faith in our ours.Still, there are some remaining areas of concern. In hopes of resolving those remaining areas, we would like to request to meet with the Reviewing Officer to discuss potential mutually agreeable resolutions to those concerns.Please apprise us in writing, via email at office@ioga.org or aaron@ioga.org, of any response to these objections, to schedule a time to meet/discuss them with us, or with any further opportunities to provide comment.Sincerely,Aaron Lieberman, Executive DirectorIdaho Outfitters and Guides AssociationJeff Bitton, PresidentIdaho Outfitters and Guides AssociationREFERENCES:i USDA Forest Service. (2018). National Visitor Use Monitoring Program. Retrieved May 6, 2021, from https://www.fs.fed.us/recreation/programs/nvum/ii Phillippe, Chelsea E., "Wilderness Recreation Trends and Impacts: A Case Study of the Sawtooth Wilderness" (2020). GraduateStudent Theses, Dissertations, & Professional Papers. 11612. https://scholarworks.umt.edu/etd/11612iii https://www.fs.fed.us/specialuses/special_outfitting.shtmliv Section 4(d)(6) of the Wilderness Act states that commercial services, such as outfitter and guides and/or pack stock rentals, may be performed to "the extent necessary for activities which are proper for realizing the recreational or other wilderness purposes of the areas." This recognition is reiterated in the enabling legislation, Section 102(f). The agencies acknowledge the MOU between Regions 1, 4, and 6 of the Forest Service, the Idaho State BLM office, and the Idaho Outfitter and Guide Licensing Board (IOGLB). Agencies will work with the IOGLB to manage commercial services within the wilderness, such as when undertaking the needs assessment through the land use plans.v U.S. Congress, Senate Committee on Energy and Natural Resources, Outfitter Policy Act of 1999,

report to accompany S. 1969, 106th Cong., 2nd sess. S.Rept. 106-491 (Washington, DC: GPO 2000), p. 11. Hereinafter referred to as "S.Rept. 106-491."vi S.Rept. 106-491.Seealso OutdoorIndustryAssociation(OIA), TheOutdoorRecreationEconomy,2017,at https://outdoorindustry.org/wpcontent/uploads/2017/04/OIA_RecEconomy_FINAL_Single.pdf.vii Mark DeSantis, Guides and Outfitters on Federal Lands: Background and Permitting Processes, 2020, Congressional Research Service, at https://fas.org/sgp/crs/misc/R46380.pdfviii As is addressed to varying degrees by the USFS as well as Congressional documents (e.g., Congressional Research Service's 2020 Report, 2008 Directives for Forest Service Outfitting and Guiding Special Use Permits).ix ROS and its Role in Forest Plan Revision The ROS Users Guide (USDA Forest Service, undated), contains a detailed description of the classes, overall concepts, and describes an inventory methodology. Specific ROS-related guidance for structure and improvement design can also be found in The Built Environment Image Guide for the National Forests and Grasslands (USDA Forest Service, 2001).x "[hellip]Managing wilderness translates to managing visitor behaviors. A firm understanding of which visitor behaviors need to be eliminated, due to their detrimental impacts, can be derived from a coupled analysis of longitudinal quantitative data. Collecting and utilizing such data provides a wilderness manager insight into past and current trends for a specific wilderness, which enables the creation and implementation of effective management actions tailored to protect wilderness recreation and wilderness character. To achieve this precarious balance of recreation and protection, managers may implement actions on a spectrum of light-handed education to limiting access through restrictive permit systems. By utilizing longitudinal qualitative data to measure a detrimental impact and associated visitor behavior, a manager does not need to rely on their perspective or educated guess. [hellip]Once managers are aware of problematic visitor impacts, longitudinal quantitative data needs to be assessed. Qualitative data, such as a manager's memory, perspectives, or impact perceptions, may not interpret or prioritize impacts the same as Forest's management plans do. These plans define desired conditions and quantify standards to alert managers of what deteriorating, and unacceptable conditions are. It is likely an updated round of monitoring will be necessary, which should follow pre-existing protocols, if they exist, to enable consistent data comparisons. Current conditions can then be compared to longitudinal data to reveal trends; and to desired conditions and standards detailed in a Forest's management plans." Phillippe, Chelsea E., "Wilderness Recreation Trends and Impacts: A Case Study of the Sawtooth Wilderness" (2020). Graduate Student Theses, Dissertations, & Professional Papers. 11612. https://scholarworks.umt.edu/etd/11612 , pg. 133