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Organization: SUN VALLEY GUIDES

Title: OWNER / AGENT

Comments: February 24, 2023 To: Objection Reviewing Officer Intermountain Regional Office 324 25th Street Ogden, UT 84401 From: Sun Valley Guides **PII REDACTED** 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 Guides (SVG) 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. SVG filed timely comments on the Draft EA for this project on August 31, 2022. SVG also provided input during the 2019 Outfitter and Guides Needs Assessment, and provided comments to the SNRA's draft EA and OGMP in April of 2022. We acknowledge and appreciate the SNRA for developing an OGMP in an effort to guide decisions and future impacts concerning outfitting and guiding. We commend the SNRA for its efforts to adapt this OGMP according to public comment received throughout this process, although we feel there remain some issues that were never addressed. We sincerely hope that this objection will lead to a resolution process that helps resolve our remaining concerns with the draft decision. Objection #1: As per SVG's comments Aug 31st, 2022, "Current Use Should be Considered for Newly Acquired Businesses In the SNRA's Categorical Exclusion Review of 2019, several guide services were given special consideration due to recent transfers of ownership. Sun Valley Guides does not have a 5-year history and therefore an incomplete data set to analyze for consideration of the Initial Allocation Increase in the OGMP. I did inquire as to why SVG wouldn't qualify for an initial increase of 50% when it seems clear that it meets the criteria by looking at the last 3 years of actual use. 2019 and 2020 are both marginal samples given 2019 was its first year of business and 2020 included a 3-month long shutdown followed by a slow recovery after having lost every single employee. Despite these inefficiencies, SVG maxed its allocation in 2019 and exceeded its allocation in 2020. To collect a 3rd year of data, SNRA would have to reference 2018 when Sun Valley Trekking hit the same mark, but none of these years take into account the influx of visitors we have seen as a result of the pandemic. 2021 is perhaps the most accurate sample of what appears to have become our new normal. SVG used its entire allocation plus an additional 1,000 in the first 8 months of the year. It is certainly worth noting, there were no documented social nor environmental concerns related to our operations despite the uptick in use. In 2022, SVG slashed and burned its program offerings, canceling more than half of its educational programming to shrink back into its original allocation after learning we wouldn't be allowed the same amount of additional use. The result of canceling trips and educational programming is bad for the public and bad for the health of the Forest. Again, there is nothing to indicate that building a ceiling over SVG's use allocation according to outdated standards is in the best interest of serving the people or the Forest, especially given how small SVG's total footprint actually is in comparison to the unguided public." Proposed Resolution: Apply a Categorical Exclusion to obtain a more complete data set for SVG that better reflects actual use by including, at least, 2021. Given 2019 was SVG's first year of business after the transfer of ownership, we intentionally slowed our business to a manageable pace, yet we reached the limit of our annual service day allocation by the end of August. 2020 was skewed by the pandemic shutdown, which closed our business for 3 months before sending us into recovery mode for the remainder of the year after losing 100% of our staff [hellip].. yet somehow we exceeded our annual allocation. In 2021 we were better prepared to serve the public. With an emerging demand, SNRA granted an additional 1,000 days of use, which allowed us to provide much needed services to the public that have proven invaluable. The SNRA has emphasized over and over the vital importance of informing the public, especially as visitation increases. SVG is one of the very few outfitters that provides extensive educational programming that greatly helps inform the public as it relates to safety, land stewardship, wildlife protection and conservation. With so few outfitters on the SNRA during the winter months, it is critical that we continue our work to help keep the public safe and to advocate for the preservation of our natural resources. Objection #2: As per SVG comments on August 31, 2022, "Priority Use Days Should Reflect Full Utilization of the 7 Backcountry Ski Huts [hellip] [hellip] backcountry huts have been permitted by the Sawtooth Forest for over 40 years with no demonstrated or documented negative impacts. The Nordic and Backcountry

Skiers Alliance believes that use days should reflect the full rental capacity of the existing huts. Backcountry skiing is the fastest growing segment of the ski industry and supports our Wood River economy. Under the proposed OGMP, the SNRA has established use limits based upon past use rather than allowing growth to meet future demand. This same approach is not taken for the other winter huts or cabins on the SNRA. The SNRA has permitted the backcountry ski huts with 14 bunks but now, after 40 years of use, the SNRA is not going to allow these bunks to be fully occupied? The number of Priority Use Days should be equal to the number of beds (bunks) in each hut multiplied by the number of days in a calendar year. The SNRA neglected to follow USFS protocol by increasing Priority Use Days at the huts for the past 12 years and instead chose to give temporary use days on an annual basis to meet the demonstrated public need. This is your opportunity to allocate enough use days to ensure the public has access to existing huts in the future during the entire winter season. An alternative and more common-sense approach would be to change how these huts are permitted to align with how the other huts on the SNRA are managed (the 4 Galena Yurts and the SNRA's Redfish Cabin) - without use-day allotments. This change would create consistency with how ski huts are handled generally on National Forest lands throughout the west. Other examples of this type of management include the largest hut system on the National Forest System, 10th Mountain Division in Colorado, as well as the largest hut system in the State of Idaho, managed by Idaho Parks and Recreation on USFS lands.

Proposed Resolution: 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. In conclusion, I'd like to reiterate our appreciation for the time and effort that has been put into this plan by the SNRA and all those who have submitted thoughtful comments with solutions in mind. Our remaining concerns are simple and we seek to support the OGMP and to improve its effectiveness with thoughtful solutions. Our guide service has been reliable partners of the SNRA since 1982, serving the public with safe and reliable access to our National Forest while actively informing our guests, inspiring a deep appreciation for the resources. At your convenience, we would like to request a meeting to see if we can resolve these concerns. We look forward to hearing from you.

Sincerely,
Zach Crist
Sun Valley Guides Owner / Agent