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Organization: SMILEY CREEK LODGE

Title: PARTNER / AGENT

Comments: February 24, 2023 To: Objection Reviewing Officer Intermountain Regional Office 324 25th Street Ogden, UT 84401 From: Smiley Creek Lodge **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, Smiley Creek Lodge (SCL) 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. SCL filed timely comments on the Draft EA for this project on August 31, 2022. SCL 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 The OGMP does not recognize historical use of guided routes on the west side of highway 75. As per comments made by Smiley Creek Lodge August 31, 2022: "Over Snow Vehicle Open Area Map The map limits guided trips to the east side of the highway. While we respect the need to protect sensitive wildlife areas identified deeper to the west and north of the Lodge, we have significant interest and need for the low elevation summer roads that are well outside this overlay. There are significant portions of every winter that prohibit snowmobiling to the east of highway 75 due to stronger solar input, which makes the roadways on the shady west side of particular interest for Smiley Creek Lodge. We would also like to have round trip circuits that loop rather than the existing out-and-back linear path on Valley Road as exists currently. We are well aware of the potential social conflict that exists within the neighborhood areas of Sawtooth City. We have already reduced the frequency of snowmobiles traveling into the neighborhood by giving our rental customers more detailed briefings. Sawtooth City residents have already expressed gratitude for this improvement. The other potential social conflict exists among snowmobile skiers in the high country, which we also honor and are willing to avoid despite the blatant NIMBY mentality at play. We are willing to compromise. That still leaves a layer in between that is not sensitive to wildlife nor other users. We feel the public and outfitters have had no input to help craft the map and we recommend that you reconsider these boundaries based on the information provided here. Please remember that the current permit area for Smiley Creek Lodge is a relic from the past when this snowmobile guide service was based in Stanley. That is why the hub of the permit area is in Stanley and not Smiley Creek Lodge. It is long past due to update and optimize this map with respect for wildlife and other users."

Proposed Resolution: In order to find a solution it's important to understand the history of this permit and how it was administered by the SNRA over the years. The permit area map hasn't changed since before Scott Williams bought the business from Don Williams in the early 1990's. When the business was purchased by the Jones family around 2007, the guide service was relocated from Stanley to Smiley Creek Lodge. Like Scott Williams did before, Smiley Creek Lodge routinely guided trips well outside of the permit area described and exhibited by the map. In particular, the west side of highway 75 was notoriously used for guided snowmobile tours without any complaints or apparent consequence since the early 1990's. The previous permit administrator for the SNRA justified this use as a means for public safety and quality of experience. It is a well-known fact that guided trips educate the public and promote public land advocacy, while also helping keep people safe. Since these guided trips didn't appear to be any kind of problem, they were allowed by the permit administrator and therefore the map was never amended. Perhaps a Categorical Exclusion would allow for Smiley Creek Lodge to retain some of the traditional routes this permit has long been known to use. With respect for the Wildlife Area of Concern, Smiley Creek Lodge would be agreeable to staying within 2 miles of highway 75 on the west side as described in the map below. To the east, we would be agreeable to the Snowmobile Area of Concern as it has been outlined in the OGMP draft decision already. 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. We feel that our appeal is understandable and our proposed solution reasonable. We intend to support the OGMP, yet we seek to help improve its effectiveness. Our snowmobile guide service has been reliable partners of the SNRA for over 4 decades, serving the public with safe and reliable access to our National Forest, inspiring authentic connection to the land. Our remaining concern is simple and focused on a map that we never had any input upon crafting. We feel the area of concern specific to commercial snowmobiling should have included our input, given we are the only snowmobile guide service in the area. We never had the opportunity to collaborate, despite stating our concerns. With this appeal we hope to find a solution that allows us to retain a very small amount of the historical guided routes to the west of highway 75 that have served the public and kept them safe for so many years. The map outlined below would preserve a high quality experience with circuitous routes, threading together points of interest that tell the story of our beloved Sawtooth Valley. These routes are not in conflict with other Forest visitors, and they are well within the motorized over-the-snow vehicle overlays. They are commonly traveled areas that would not constitute any noticeable change, yet we would be willing to forfeit the summer roads deeper west in the interest of sensitive wildlife concerns. At your convenience, we would like to request a meeting to focus on resolving this matter. We look forward to hearing from you. Sincerely, Zach Crist Partner / Agent Smiley Creek Lodge