

Exhibit C

Last name: schwarzhoff

Organization:

Title:

Official Representative/Member Indicator:

Address1: 4753 n fieldcrest way

Address2:

City: boise

State: ID

Province/Region:

Zip/Postal Code: 83704

Country: United States

Email: chrisschwarzhoff@cs.com

Phone:

Comments:

To: Anthony B. Botello, Krassel District Ranger

Subject: Sugar Creek Storm Treatment and Ford Rehabilitation

We are writing to provide comments on the above project. We do have specific comments about the project proposed, but first we would like to comment about the very misleading and incorrect status of the Sugar Creek road as described in the Project Description. The Sugar Creek Road is a long established road. The road was shown as an "unimproved dirt road" in the 1984 PNF visitor map. In the 1995 PNF visitor map the road was shown as an "Unimproved Road, Includes 4WD Not Maintained for Passenger Cars". In the 2007 PNF visitor map (McCall/Krassel portion) the road is shown in it's entirety on the back side of the map as an "Unimproved Road, Includes 4WD Not Maintained for Passenger Cars", and on the front side of the map a small portion of the road is shown with the same description, but also includes a ATV marking next to that small portion of the road. Thus there appears to be some question of the status of the road in 2007. In order for the Forest Service to change the status of a Forest Road designated as open to the public one of two action must occur: either issuance of a special order following CFR regulations or completion of a environment analysis under NEPA. We are unaware of any special orders issued changing the Sugar Creek Road to an ATV trail nor are we aware of any valid NEPA Analysis on this subject. The only NEPA analysis we are aware of touching on this subject was the 2007 PNF travel plan & subsequent 2008 ROD followed by the 2010 BC/YP analysis. All three of these projects have been found invalid as it relates to Management areas 12 & 13 (includes Sugar Creek) in Federal Court. The 2007 PNF visitor map does state the following "This visitor map depicts the present day open road and trail system. Changing conditions may require the Forest Supervisor to issue restrictions that supplement or differ from those on this map. The changes will be displayed on the Motor Vehicle Use Map." The first MVUM published by the PNF was in 2010 and did delete the Sugar Creek Road from the designated road & trail system. This MVUM was based on the invalid NEPA analyses referenced above. Thus the validity of 2010 MVUM, and subsequent MVUMs in Management areas 12 & 13 is very much in question & in fact is the subject of intensive discussion in the remedy phase of the still ongoing litigation mentioned above.

Based on the descriptions of actions to be taken it appears the proposed project is really an action to functionally close a road that has not been legally closed, and follows the same objective as placing large boulders in the road earlier this year. This would be in direct opposition to long standing laws and regulations relating to processes to be followed to legally close roads.

As a member of the Big Creek - Yellow Pine Collaborative working to identify the permanent road & trail system we believe this proposed action is premature. For example if the long term decision is to legally close the Sugar Creek Road then many of the drainage solutions would be much simpler - just cut the road. We strongly recommend this action be postponed until the Collaborative has a chance to complete their work.

One very important aspect of the proposed action is to modify the road structure without any consideration of Winter Travel. The sugar creek road is an important travel way for over-snow travelers. This route is snow bound for more than half the year and this area is open to over-snow travel. Drainage off the road structure is extremely important to over-snow travelers. On March 31, 2016 we provided Anthony Botello a flash drive with videos showing how minor road drainages can severely restrict over-snow travel.

Exhibit C

The ford restoration proposed in the action would definitely inhibit over-snow travel. The existing ford is configured in such a way that a natural snow bridge develops every year that allows over-snow travel through the ford. Below is a picture of the ford and the snow bridge that forms on the downstream side of the ford under the current conditions. Please ignore the snowmobiler in the picture as he is just "haming it up for his buddies after failing to climb the bank after crossing the snow bridge at the Sugar Creek Ford.

Thank you for this opportunity to comment on the proposed action. If we could be of any help in developing water features that accomodate over-snow travel please let us know.

Chris Schwarzhoff
chrisschwarzhoff@cs.com

Lois Schwarzhoff
loisschwarzhoff@cs.com

208 322-2781
4753 N Fieldcrest Way
Boise, Idaho