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EFSF Ramp

We are very much interested in your proposed EA for the Yellow Pine Area. We have long personal ties and interests in this area. This area is unique in that it is very remote with outstanding natural resources, but not in a designated wilderness. The road network is not dense, and was constructed primarily to support mining in the area. The current use of the roads is primarily recreation oriented, but the roads do provide vital access for administration functions including fire management. Because of long standing efforts of the Forest Service to close roads in the East Side of the Payette National Forest, people with an interest in maintaining public access in this area requested assistance from Valley County who in turn has secured FRTA easements on the higher traffic roads, which of course removes these roads from Forest Service jurisdiction relative to public use.

Our interests in these remaining roads prompted us to be one of the parties to initiate legal action to prevent wholesale road closures in this area as contained in the PNF travel plan. The final outcome of the lawsuit included the complete redoing of the PNF travel plan for the east side of the Krassel Ranger District (minus of course the wilderness areas). The final decision included establishment of a collaborative of interested parties that was to prioritize that public input was a vital part of doing sustainable travel plans.

We were founding members of the Big Creek/Yellow Pine Road Collaborative and at least one of us was present at every one of the collaborative meetings over a course of about 3 years. One of the outputs from the collaborative was a list of recommendations for 3 different areas that represented a consensus from the collaborative. It is important to note that we agreed with a very high percentage of the recommendations, but not all. Our comments in this letter will focus on where we believe your EA analysis should look beyond the collaborative recommendations in the EFSF RAND.

The collaborative produced several documents describing the consensus reached for this area. We are not sure which document the Forest Service has received; therefore we are attaching/enclosing what we hope was the document received by the PNF in late 2019 as Exhibit A.

First of all, we would like to suggest it would be very beneficial in complicated EA's such as this to use a holistic approach by looking at this as a broad management activity that addresses strategic issues with sustainability as the overriding criteria. The long standing holistic approach to human wellbeing is rapidly being adapted and used in companies worldwide.

Now down to some of the parts to this Restoration and Access Management Plan where we want to add some different thoughts to those from the Collaborative. Our comments will focus on two of the roads in the Yellow Pine area. Both of these roads were specifically named in our legal complaint that was ultimately successful to the latest PNF travel plan being rejected (see Exhibit B to this letter for copy of that complaint).

### Sugar Creek Road

This road was an old and highly used route by recreationists and access to the Cinnabar Mine (private property) until closed by the PNF by reconstructing a ford so as to prohibit motorized vehicles. At the time the collaborative was analyzing this situation it appeared there might be a permanent alternative solution to this route. Further analysis of that alternative revealed three important findings:

- (1) It required access across private property that would be difficult/expensive to obtain on a permanent basis.
- (2) The alternative route could not be classified as "reasonable access" to enclosed private property (as specified in Federal Law - which would include - capable of providing access for delivery vehicles).
- (3) The alternative cannot be upgraded to a route considered "reasonable access".

The collaborative did not come to a consensus decision on the Sugar Creek Road, but we believe it is imperative that a final decision be made in your EA. The Forest Service undertook the repair project on the Sugar Creek Road during the period the collaborative was attempting to complete their task of developing recommendations on roads as described in the Settlement Agreement from the successful lawsuit. As part of the repairs the Forest Service rebuilt a ford across Sugar Creek in such a way as to make the road impassible to motorized vehicles. Following this action they installed closure gates on the Sugar Creek Road. Members of the collaborative including us complained about these actions to the Forest Service. We seriously considered going back to the Judge in the lawsuit with the accusation the Forest Service was acting in bad faith relative to the Settlement Agreement, but finally concluded the Forest Service would ultimately perform a NEPA study (as described in the settlement agreement) that would properly determine the status of the Sugar Creek Road. We strongly recommend the Sugar Creek Road is included in your EFSF Ramp. We are enclosing/attaching copies of correspondence to the PNF from us and others relating to this road as Exhibits C & D.

### Red Metal Mine Road

This road starts on Forest Service land, but quickly crosses across private property and then back on to Forest Service land. The major users of this road over the past 50 years have been to drive to the Red Metal Mine (entirely located on FS land). The vehicles (mostly cars) were parked at the mine and the people (and pets) hiked up to Crater Lake. Most visitors went to go fishing. Crater Lake and the Cinnabar Mine were the two most popular destinations in this area for recreationists operating out of Yellow Pine. Crater Lake was also a popular area for recreationists staying in Big Creek.

The procedures used by the PNF to close this road were very controversial and involved legal technicalities; therefore we, and the involved private property owner hired attorneys to prepare our comments to the proposal. Those comments are included/attached as Exhibits E & F.

Finally we propose that if the Red Metal Mine Road is not determined to be available for public access in the EFSF RAMP then consideration should be added to the collaborative proposal for the Wilson Mine motorized trail option that would include some kind of extension from the end of that existing route to Crater Lake. An extension of the proposed motorized route would be the best solution, but even a non motorized trail extension would be a great plus for the recreation community and for businesses in the Yellow Pine area. The map of this possible alternative is in Exhibit G.

The main point we wish to convey is that both of these roads create recreation that is critical to the financial sustainability of the village of Yellow Pine.

As you move forward with the EFSFRAMP we would like to point out that the amazing Big Creek/Yellow Pine Collaborative (this group was unbelievably dedicated to task) developed a large amount of information both internally by members & in all kinds of document, photos & video. We believe this information would be willingly shared, and believe that could be done by contacting the leaders of the 3 sub groups (Recreation, Rounded and Resource). The recommendations in Exhibit A were the "big picture" product from the collaborative, but behind each recommendation there was a lot of work and data gathering.

We would be available to answer any questions you may have, and thanks for considering our comments,