

Attn: Doug Ruppel, District Ranger, Douglas Ranger District, Coronado National Forest;  
and Kerwin S. Dewberry, Forest Supervisor and Reviewing Officer

Comments the Final EA for the South Fork Day Use Area

Dear U.S. Forest Service,

The Final EA and Preferred Alternative (Alt B) eliminates and corrects several proposed activities that detracted from the desired conditions in the ZBA. However, I still believe the No Action Alternative (Alt A) is better for numerous reasons. USFS now recognizes the high natural values with several special designations but arbitrarily uses the values placed on the South Fork in the 1930's as the baseline for management. Overnight camping was permitted (I used the old campground myself) but this use is now viewed as not compatible. Historically the Canyon was logged, and cattle grazing was permitted, yet these multiple-use activities are now recognized as detrimental to the zoological and botanical values. There used to be signs pointing to natural features, such as Skull Cave; they were removed. A picnic area is equally not appropriate in a ZBA. The 2014 flood did what the agency should have done years before.

This Final EA continues the practice of proposing piecemeal developments rather than complying with the intent of NEPA and looking at the cumulative impacts. As I pointed out in my comments on the Draft EA, the disturbance of the road and drainage ditches, cabins, gates, bridge, parking areas, berm, riprap banks and the proposed development combined on the ZBA is ignored. A comprehensive management plan should be developed to adequately analyze the combined environmental impacts of USFS permitted activities. Each individual allowed action may not seriously impact ZBA values, but the impact of the combined activities is not addressed anywhere.

This spring I was at the berm mid-week and counted 13 vehicles parked in the cleared area. Local residents report seeing approximately 30 cars lined up along the road when the first trogon was sighted this spring. Yet, only 9 parking spots are proposed in Alt B so, obviously, excess visitors will continue to park along the road when the proposed gate is closed. Curiously, parking along the road is addressed in Alt A but not in the Preferred. Will the USFS continue piece-meal planning and add additional parking spots when this phase of development is shown to be inadequate? The Draft document addressed long vehicles parking along the road at the picnic area; where will they park in Alt B or will they be prohibited from driving down the South Fork road?

The site map of Alt B shows a fee station but there is no discussion of a fee being charged and how this will impact visitors. Currently there is no fee to attend to basic human needs at the berm in South Fork, thanks to FoCCC. Given the economic condition of the average resident of the local area there likely will be increased use of the bushes to avoid having to "pay to pee". There currently are free restrooms at Herb Martyr and the Visitor Center but, when ya gotta go ya gotta go; and it takes awhile to drive to either restroom from South Fork. During the 8 months the public can park at the berm and hike up the trail there is no mention of the pot-a-potties currently in place. If they have to walk then drive all the way back I think it unlikely that many visitors will return to use the new restroom. When the gate is locked, people who are at the berm and need a restroom certainly won't walk/run .75

miles to use the proposed one. An additional unintended consequence of a fee will be people of lesser economic means parking before the fee area boundary. (I use to do this when a fee was charged to park at the old South Fork Campground.) If this distance is still ¼ mile it will result in vehicles parking along the 42 Road, creating a new traffic hazard. New, unofficial pullouts off the asphalt will be created impacting vegetation and wildlife.

The new plan recognizes that several groups of officials and cabin owners will continue to drive the South Fork road when the gate is closed. Birders and hikers will continue to have to dodge vehicles and breath dust during this period. Since visitors will be concentrated near the gate rather than strung out the whole length of the South Fork road it hardly will be peaceful, as is claimed. Thank you for insuring wheelchair access through the gate but can equestrians get through? I had frequently hiked up the South Fork trail into the Wilderness Area for several years before and after Odile destroyed the upper section of the road and the hike became about 1/3<sup>rd</sup> mile longer. Since then I have noticed some reduction in hikers along the lower part of the Trail, to the “Bathtub” and a major reduction past the “wobble gate”. Adding another .75 mile to get to the Wilderness will reduce my personal trips during the March through June closure. I suspect others will also give up on longer hikes. Since the USFS depends on volunteers (such as myself) to maintain much of the trail system I believe the South Fork Trail will deteriorate if Alt B is selected.

The reduced number of picnic tables is better than in the Draft but there still will be corridors attracted to the site during the day and scavengers (raccoons, skunks and coati) at night. People and picnics will result in food waste. Nearby nesting songbirds will be impacted and visitors will have an increased risk of unwelcomed encounters with mammals that bite. I’m also suspicious that USFS will respond to “complaints” from picnickers about dust from vehicles driving past the tables as justification for paving the area (is this why tables are placed so close to the road?). I wish there had been more alternatives presented including one where parking spots are built where the proposed tables are located. If there was only a restroom and parking (as is currently present at the berm, Herb Martyr and the Visitor Center) there would be no need for a fee; and with less development maybe AGFD/USFWS would drop their requirement for the seasonal closure of South Fork road. The proposed signs and kiosks should be placed at the parking area just off the 42 Road where the existing sign about recording devices is now located. Again, there needs to be a comprehensive plan for all of South Fork rather than this piecemeal plan to develop a complex recreation site in a ZBA.

In conclusion, I recommend you select Alternative A. The USFS should then develop a site-specific comprehensive development and management plan in cooperation with all stakeholders. Depending on complexity, impacts, controversy, and development proposals, write an EA or EIS to guide long-term decisions to protect the ZBA values, and to provide for enjoyment by the public who are there because of those natural values.

Respectfully,  
Albert R. Bammann