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First name: Richard

Last name: Webster

Organization:

Title:

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U.S. Forest Service, Coronado National Forest

ATTN: Emily Reynolds, NEPA Planner

300 West Congress Street

Tucson AZ 85701

Re: South Fork Day Use Area Draft EA

Dear Ranger Ruppel and Planner Reynolds:

We believe the current Draft EA provides insufficient information about the effects of Proposal B, and that Proposal A is preferable until such time as additional analysis and information are provided and the defects in Proposal B are cured.

The Draft EA is on its face insufficient. The stated purpose (p. 1) is to determine if the proposed project "may significantly affect the quality of the human environment." However, most of the analysis is about how harmful the construction of the project would be, not about the net effects after it is built (more below). Further, there is inadequate detail on important aspects of this project. For example, a partial road closure is mentioned, but the need for it is not discussed, nor the timing explained (we are in favor of the closure, more below, but the Forest Service's rationale is unexplained). Another example is the effect of habitat fragmentation, raised by us previously and by others, which is not even mentioned.

Proposal B adds disruption to South Fork. What the Draft EA fails to adequately discuss and mitigate is that the net result of Proposal B will be that we will have most of the harmful effects on the environment of Proposal A (henceforth "Future Proposal A"), plus the harmful effects on the environment of Proposal B. Our dismay is with the equation: Future A + B = greater harm to South Fork. Under Proposal B, the only way in which the deleterious elements of Future Proposal A are reduced is by a four-month closure of the road. Furthermore, Future A will exist without the port a potties, generously provided by FoCCC in recent years, while for the other eight months of the year there will be both increased use of bushes as bathrooms by those who choose not to commute back to the permanent facility of Proposal B and increased driving back and forth to use the permanent facility (dust, hazard, etc.) (acknowledging that some may need no bathroom at all during a visit, or stop at the permanent facility either entering or leaving the canyon). No, we are not asking the planners to model bathroom behavior; rather, we are asking that the EA recognize the possibility (probability in our view) that completion of Proposal B will mean business as usual in many ways for eight months of the year plus the fragmentation caused by the new Day Use Area. Further, it is our prediction that many (most?) users will not stop at the Day Use Area at all when the road is open.

We would like to see no net increase in the human effects on South Fork. We do believe that a long-term improvement to the bathroom problem is important, and we would like to see more of the human usage moved closer to the mouth of the canyon. We could support a Proposal B, but only if the harmful effects of Proposal B are better balanced by a reduction in the harmful effects of Future Proposal A. This can occur by longer closure, total closure, or some other structured closure (discussed more two paragraphs below), and by trying to reduce the current human footprint at the end of the road ("the berm"), which is a fairly large cleared area that fragments this part of the canyon (replanting?).

We also believe it is very important to address the linkage of the closure of the road to Proposal B more clearly. We do not know enough about how the Forest Service functions to be specific and accurate: Does an issue like this belong in a Management Plan? Our concern is related to questions such as: Is the nature of the closure subject solely to the discretion of the District Ranger? We certainly respect the need for Forest Service Staff to be able to open and close areas depending on current hazards or special biological needs, but could a future District Ranger after Proposal B is implemented decide to open the road permanently without any public input?

There are, of course, popular elements to Future Proposal A, such as easy access by car farther up the canyon than the proposed Day Use Area (Proposal B). We have enjoyed them, but we are willing to give them up all year long. We are not convinced that a "hard closure" (e.g., a locked gate) is necessary, versus a "soft closure" (explicit signs with adequate threats; we realize that enforcement will be rare, but we believe non-compliance will be rare). We also think that there are ways in which some can be allowed greater access with minimal harm, at least seasonally, two categories potentially being those with handicapped plates and high-occupancy vehicles (HOV of 4+ or 5+?). We have told ourselves that there are many easy trails to fabulous places in our national parks that are longer and harder than the distance from the proposed Day Use Area to the current end of the road.

We can be brought to be more supportive of a plan such as Proposal B, but we need to see it as a plan that is not a net loss for the totality of the canyon environment, and has explicit long-term protections of it. We appreciate the planning effort to date by the Government, and the generous support that FoCCC is providing the Government (hence, to 'we the users'); we suspect a workable plan is closer.

Sincerely,

Richard & Rose Ann

Richard E Webster
Rose Ann Rowlett