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Environmental Assessment

Cedar Creek Falls Visitor Use Permit System

Palomar Ranger District, Cleveland National Forest
San Diego County, California

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SUMMARY OF PROPOSAL

The proposed action is to designate a visitor use permit area in the vicinity of Cedar Creek Falls (CCF). Visitors to this area would be required to obtain a visitor use permit through the National Recreation Reservation Service (NRRS). A limited number of visitor use permits would be issued each day. The number of visitor use permits issued would be adjusted as determined by an adaptive management process. The proposed action also includes permanently prohibiting the possession of alcohol at CCF, along the trail and at the trailheads; and permanently closing the cliff faces surrounding CCF to public access.

This project addresses concerns related to:

- Public health and safety at CCF, and on the San Diego River Gorge Trail (SDRG Trail) and Eagle Peak Road (Trail)
- Resource impacts stemming from high levels of recreational use at CCF, and on the SDRG Trail and Eagle Peak Road (Trail)
- Traffic congestion and parking concerns in the San Diego Country Estates (SDCE) neighborhood that result from high levels of recreational use at CCF

There is a high public demand for recreation opportunities in the CCF area. Implementing a visitor use permit system as well as prohibiting alcohol consumption and access to the cliff access will maintain these opportunities while mitigating the natural resource, recreation, and social concerns listed above.

The environmental assessment does not identify any significant environmental consequences resulting from the proposed action.

1 - INTRODUCTION

1.1 - Document Structure

The Forest Service has prepared this Environmental Assessment in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal laws and regulations. This Environmental Assessment (EA) discloses the direct, indirect, and cumulative environmental impacts that would result from the proposed action and alternatives. The document is organized into four chapters:

- *Chapter one - Introduction:* This section includes information on the existing condition and purpose and need for the project, including a summary of Cleveland National Forest Land Management Plan direction as it relates to the project. This section also provides an overview of how the Forest Service informed the public of the proposed action and draft EA.
- *Chapter two - Alternatives, including the Proposed Action:* This section provides a description of the proposed action as well as possible alternative methods for achieving the stated purpose. These alternatives were developed based on issues raised internally, by the public, and by other agencies. This section also includes a discussion of alternatives initially considered but dropped.
- *Chapter three - Environmental Consequences:* This section describes the environmental effects of implementing the proposed action and alternatives. This analysis is organized by resource. Within each section, relevant information on the affected environment is described, followed by the effects of the No Action Alternative that provides a baseline for evaluation and comparison of the other alternatives that follow.
- *Chapter four – Persons, Groups, Organizations, and Agencies Consulted:* This section provides an overview of the persons, groups, organizations, and agencies consulted as part of this project.
- *Chapter five – References:* This section lists the references to published and unpublished sources cited in the body of the EA. This section also provides a list of preparers and those groups, organizations, and agencies consulted during the development of the environmental assessment.
- *Appendices:* The appendices include information regarding Tribal consultation on this project; questions and answers about the proposed visitor use permit system; and responses to the comments received during the project’s scoping and comment periods.

Additional documentation, including more detailed analyses of the project’s effects on natural resources, additional background information, and public comments, may be found in the project record located at the Palomar Ranger District Office in Ramona, CA.

1.2 - Location

The location of the project area is Cedar Creek Falls (CCF) and its immediate vicinity within the San Diego River Gorge, as well as the trailheads and trails that lead to CCF. CCF is accessed from the west via the San Diego River Gorge Trail and Trailhead (“SDRG Trail” and “SDRG Trailhead,” respectively). Visitors access CCF from the east via an abandoned section of Eagle Peak Road, hereafter referred to as “Eagle Peak Road (Trail).” No developed trailhead facilities exist at any point along Eagle Peak Road (Trail), though visitors using the eastern access to CCF typically park at a large, undeveloped dirt pullout traditionally used by forest visitors, hereafter referred to as “Saddleback Trailhead.”

The legal land description of the project area is Township 14 South, Range 2 East, Sections 1 and 2; Township 13 South, Range 2 East, Sections 34, 35, and 36; and Township 13 South, Range 3 East, Section 31; San Bernardino Meridian. See Figure 1 on page 3 for a map of the project area.

The proposed visitor use permit area is located in the immediate vicinity of CCF. The legal land description of the visitor use permit area is Township 14 South, Range 2 East, Sections 1 and 2; and Township 13 South, Range 2 East, Section 36; San Bernardino Meridian. See Figure 2 on page 4 for a map of the proposed visitor use permit area.

The proposed permanent alcohol prohibition would cover the project area. The legal land description of the proposed alcohol prohibition is Township 14 South, Range 2 East, Sections 1 and 2; Township 13 South, Range 2 East, Sections 34, 35, and 36; and Township 13 South, Range 3 East, Section 31; San Bernardino Meridian. See Figure 3 on page 5 for a map of the proposed Cedar Creek Falls Alcohol Prohibition.

The proposed permanent cliff closure at CCF would be located in Township 14 South, Range 2 East, Section 1, San Bernardino Meridian. See Figure 4 on page 6 for a map of the proposed Cedar Creek Falls Cliff Closure.

Figure 1. Project Area Map

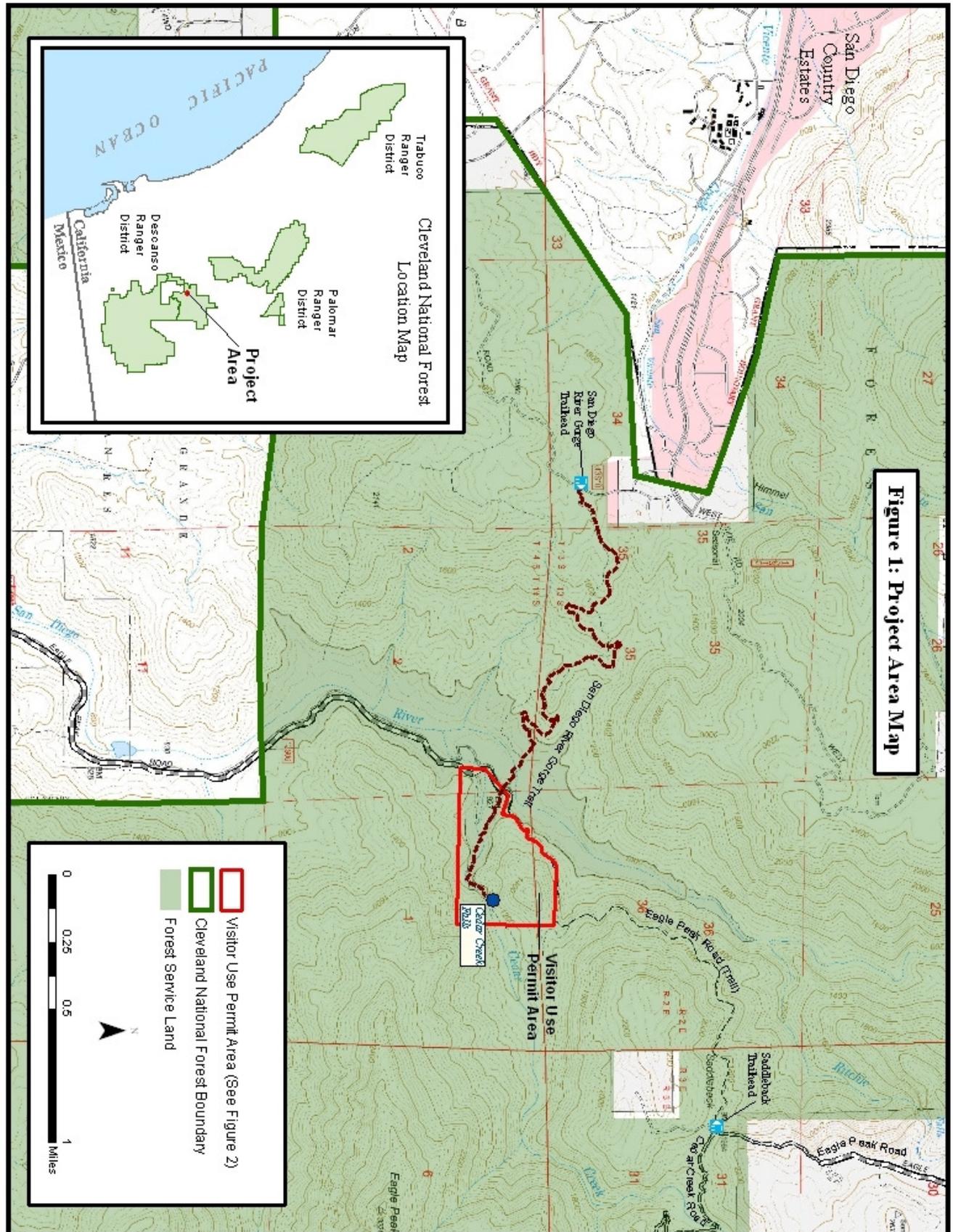


Figure 2. Visitor Use Permit Area Detail

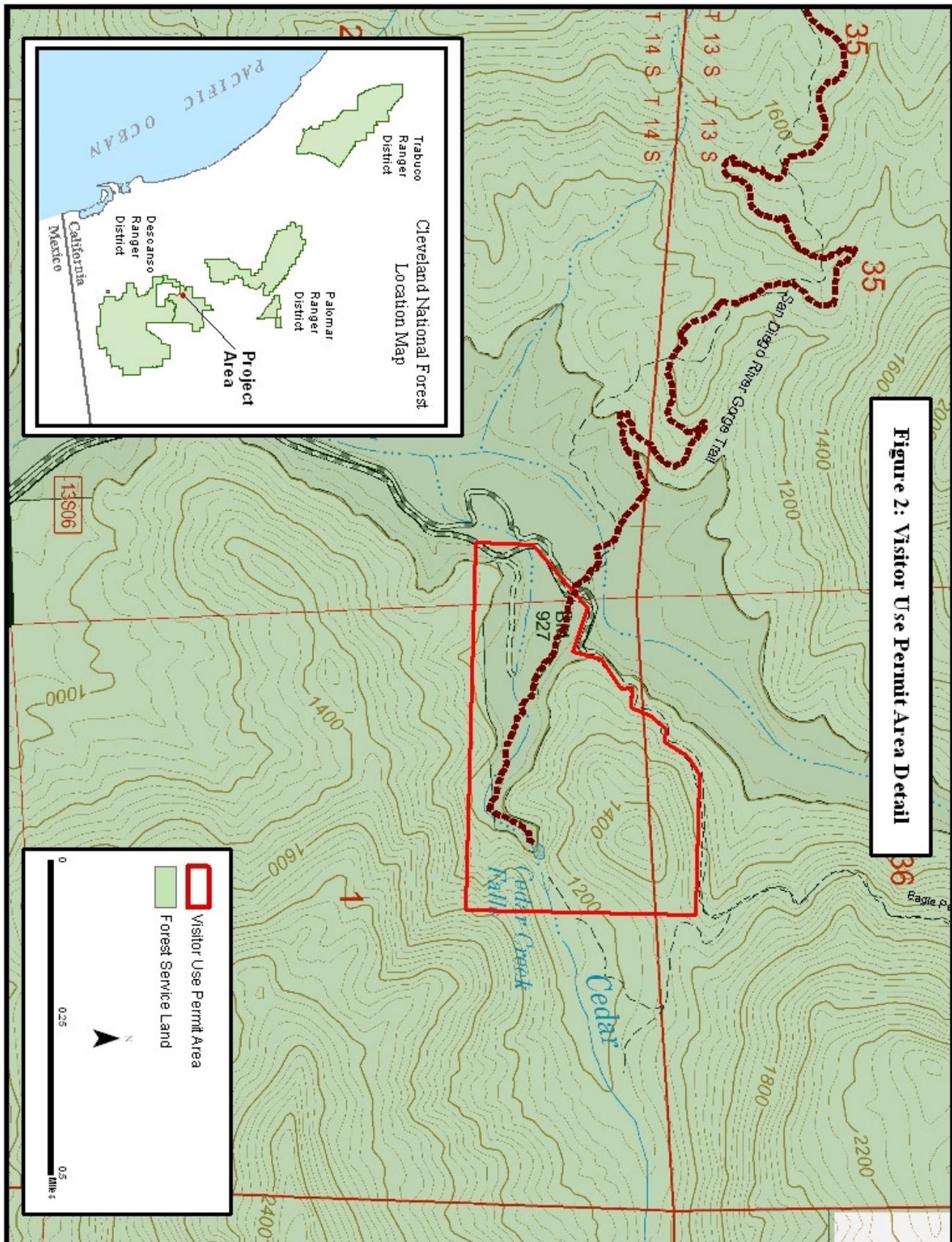


Figure 3. Cedar Creek Falls Alcohol Prohibition Map

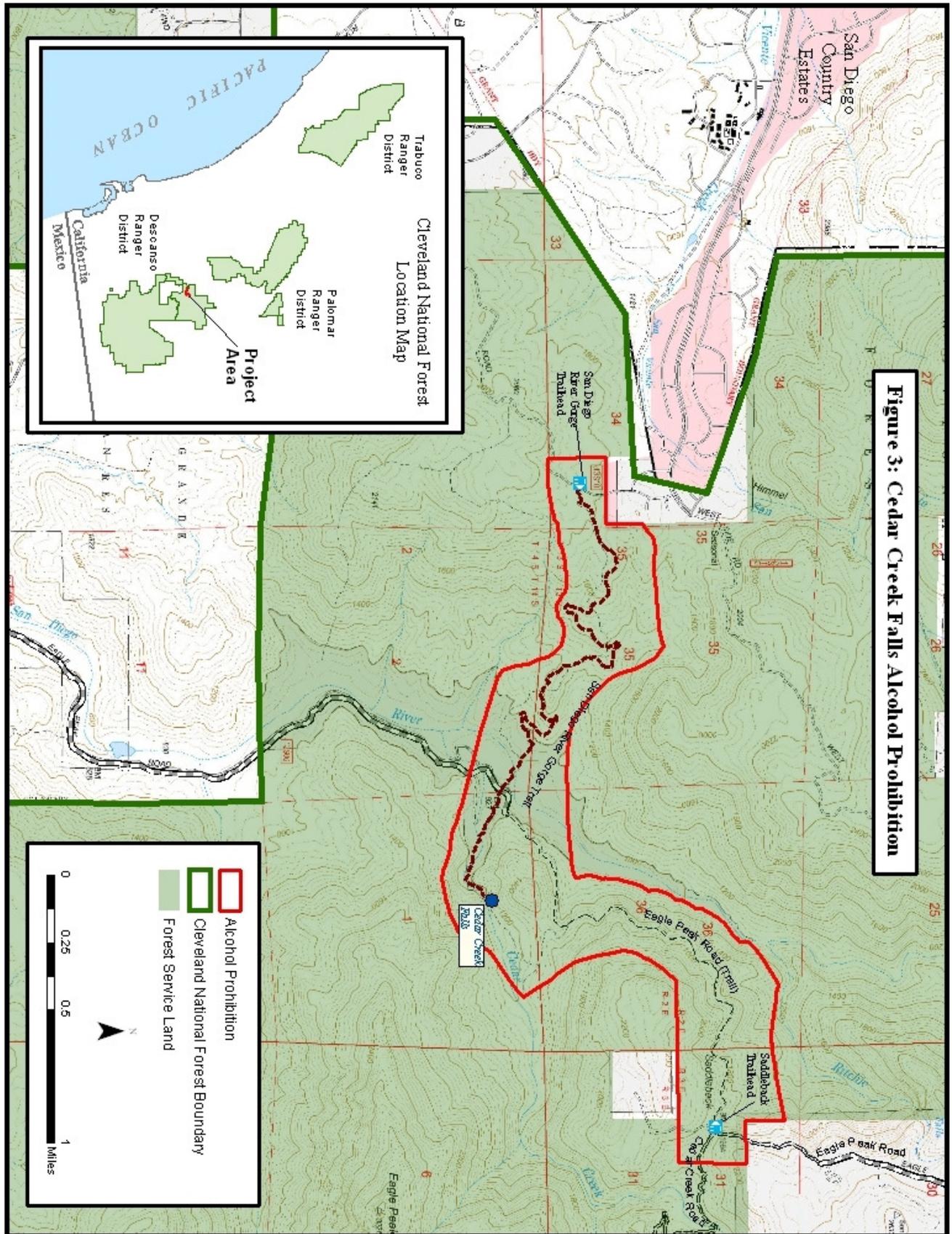


Figure 4. Cedar Creek Falls Cliff Closure Map

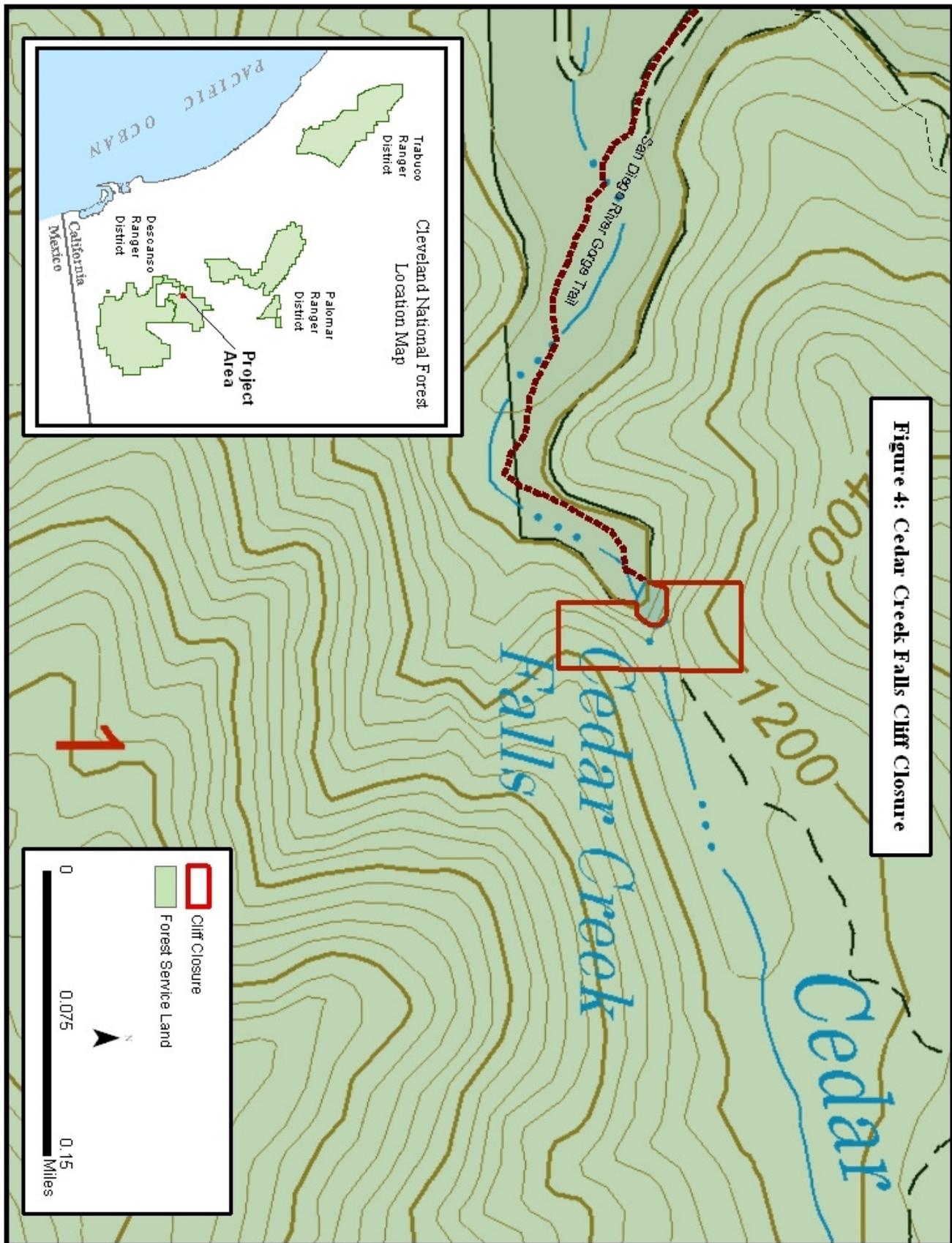


Figure 4: Cedar Creek Falls Cliff Closure

1.3 Existing Condition

Currently, CCF can be accessed from both the west and east sides of the Palomar Ranger District via the SDRG Trailhead and Saddleback Trailhead, respectively. Until the completion of the SDRG Trail and Trailhead in the spring of 2011, access to this recreation destination from the west side of the Palomar Ranger District was via informal, user-created trails. Visitors from the east have traditionally used Saddleback Trailhead and Eagle Peak Road (Trail), which is currently gated near the junction of Eagle Peak and Cedar Creek Roads.

On July 9, 2011, CCF, the SDRG Trail and Trailhead, Eagle Peak Road (Trail), and the Saddleback Trailhead were temporarily closed using a Forest Order (Order No. 02-11-05, followed by Order No. 02-11-09). The purpose of this order was to allow the Forest Service to address public health and safety issues and resource issues associated with recreational use at CCF. On April 1, 2012 this Forest Order was modified to restore public access to CCF via the Saddleback Trailhead and Eagle Peak Road (Trail); as of April, 2012 the area surrounding the SDRG Trail and Trailhead remains temporarily closed (Order No. 02-12-04). In addition, two new temporary Forest Orders were implemented on April 1, 2012. The first of these Orders prohibits the possession and consumption of alcohol at CCF, along the SDRG Trail and Eagle Peak Road (Trail), and at the SDRG and Saddleback Trailheads (Order No. 02-12-05). The second of these Orders closes the cliff faces surrounding CCF to public access, which in effect prohibits visitors from climbing on and jumping from the cliffs surrounding CCF (Order No. 02-12-06).

Parking

The SDRG Trailhead parking lot, adjacent to the San Diego Country Estates (SDCE), accommodates 29 vehicles, including 2 ADA compliant parking spaces. No developed parking currently exists at the Saddleback Trailhead, although visitors have long used a large, undeveloped dirt pullout at the junction of Eagle Peak and Cedar Creek Roads as an informal parking area. The developed parking area at the SDRG Trailhead was not designed to regulate or limit visitation to the Cleveland National Forest or to prevent forest visitors from parking on County roads, but rather to alleviate some parking congestion on County roads.

CCF has long been a popular recreation destination in San Diego County, though recreational use of this area has increased in recent years. See Table 1 for a summary of visitor use levels in 2007 as compared to 2011. Overflow parking in recent years in SDCE that is associated with public visitation to CCF has been observed most frequently on the following County of San Diego maintained public roads:

- Thornbush Road
- Love Lane
- Cathedral Way
- Cherish Way
- Bellbottom Way
- Ramona Oaks Road

All parking associated with public access to CCF from the east side of the Palomar Ranger District occurs at or adjacent to the Saddleback Trailhead on Eagle Peak Road, a County of San Diego maintained public dirt road.

Table 1. Summary of CCF parking patterns routinely observed on busy days in SDCE (adjacent to SDRG Trailhead) and at Saddleback Trailhead in 2007 and 2011¹

	2007	2011
Vehicles parked per day in SDCE	50-60	200-300
Vehicles parked per day at Saddleback Trailhead	20	80
Total vehicles parked per day at or near both trailheads	70-80	280-380
Proportion of vehicles parking in SDCE	71-75%	71-79%
Proportion of vehicles parking at Saddleback Trailhead	25-29%	21-29%
Vehicles parked in SDCE on busiest day observed		730

Visitation Estimates

Forest Service staff – which began monitoring parking levels at the SDRG Trailhead in 2007 and collectively has years of experience managing CCF and the surrounding area – estimate that the average vehicle at the trailheads that lead to CCF has historically contained approximately 3 people. The Forest Service therefore assumes that on average each vehicle at the SDRG Trailhead and Saddleback Trailhead continues to contain 3 hikers. Use in the CCF area has grown from approximately 210 to 240 hikers on a typical busy day in 2007 to 840-1140 hikers per day on a typical busy day in 2011. On the busiest day observed in 2011 this estimate of average vehicle occupancy yields a figure of approximately 2,190 individuals accessing the SDRG Trailhead and Trail. It is important to note that this latter figure does not include the additional visitation that occurred from the Saddleback Trailhead on this busy day because no traffic counts were collected at the Saddleback Trailhead at that time.

While Forest Service staff estimate that vehicles at the SDRG and Saddleback Trailheads have historically contained an average of 3 visitors, a number of other sources of information about vehicle occupancy in this area exist as well. For instance, San Diego Sheriff's Department Deputies posted at the SDRG Trailhead between July 9, 2011 and November, 13, 2011 counted an average of 2.1 occupants per vehicle that pulled up to the trailhead, although the trailhead was closed during this period (Sgt. Bavencoff, personal communication, January 10, 2012). Additionally, in 2009 the Forest Service undertook a study of recreational use characteristics across the Cleveland National Forest as part of the Forest Service National Visitor Monitoring Use survey. The results of this survey show that vehicles visiting the Cleveland National Forest contained an average of 2.3 individuals (USDA, 2009). Table 2 provides the full range of known vehicle occupancy estimates that may apply to this area.

¹ These figures are based on both long-term Forest Service staff observations and a San Diego County Traffic Advisory Committee (2011) study. The San Diego County Traffic Advisory Committee study of daily traffic volumes in the neighborhood adjacent to the SDRG Trailhead occurred in April and May of 2011. This report details the figures presented in this document and is available in the project record. Estimates of vehicles at the Saddleback Trailhead are based on Forest Service observations. Figures related to the number of vehicles parking in the vicinity of the SDRG and Saddleback Trailheads are for the number of vehicles observed throughout the course of one day, not the number of vehicles observed at one time.

Table 2. Summary of estimated CCF visitation on average busy days in 2007 and 2011, based on the parking patterns depicted in Table 1²

	Total visitors	Visitors at CCF, based on 95% visitation rate	Visitors at CCF, based on 90% visitation rate
Visitation in 2007 @ 3 visitors per vehicle	210-240	200-228	189-216
Visitation in 2011 @ 3 visitors per vehicle	840-1,140	798-1,083	756-1,026
Visitation in 2007 @ 2.3 visitors per vehicle	161-184	153-175	145-166
Visitation in 2011 @ 2.3 visitors per vehicle	644-874	612-830	580-747
Visitation in 2007 @ 2.1 visitors per vehicle	147-168	140-160	132-151
Visitation in 2011 @ 2.1 visitors per vehicle	588-798	559-758	529-718

Increased public use of this area over the past 5 years is likely the result in part of a rise in media attention, especially in the form of social media – CCF now has its own “Facebook” page as well as dedicated pages on other social media and Internet sites. Further complicating this issue, three consecutive wet years following a prolonged drought resulted in higher visitation year-round in 2011 in contrast to the past when visitor use substantially declined when the water dried up. Trail improvements completed in the spring of 2011 and high levels of media attention to the controversies surrounding CCF contributed to and increased use and exacerbated management challenges.

Health and Safety

Since 1998 three individuals have died while jumping from the cliffs into the pool below CCF, and others have suffered severe injury, including permanent paralysis. Additionally, in 2012 one individual died from heat stroke on Eagle Peak Road (Trail). According to the San Diego Sheriff’s Department, CCF and the SDRG Trail produce more rescues than any other area in the San Diego County Sheriff’s jurisdiction. During the 2010 calendar year, Sheriff’s Department rescue personnel conducted a total of 31 helicopter medical assist calls to the CCF area. In 2011 the Sheriff’s Department conducted 31 helicopter medical assist calls between January 1 and July 9, when the area surrounding CCF was closed to public access (Lt. Richardson, personal communication, March 20, 2012). Approximately ninety percent of these calls were related to dehydration; the remaining rescues were associated with injuries and other medical conditions, some sustained by visitors who were jumping and diving from the cliffs surrounding CCF.

The CCF area has had a history of alcohol consumption by visitors. Safety issues stemming from alcohol use are exacerbated by hot temperatures routinely exceeding 100 degrees Fahrenheit during the summer months. Further, by 2011 large assemblages of young people and partying had become common around CCF – prior to its temporary closure in July of 2011 the area had become known widely as a “party spot.”

² The vast majority of visitors to the Cleveland National Forest who park in SDCE and at the Saddleback Trailhead intend to visit CCF. Forest Service staff estimate that up to 95% of visitors to this area seek to visit CCF. The “95% visitation rate” and “90% visitation rate” columns in Table 2 depict estimated use levels over the course of a busy day at CCF if 95% and 90% forest-related recreational traffic in SDCE and at the Saddleback Trailhead is related visitation at CCF. It is important to note that these visitation estimates do not mean that all the visitors that visit CCF over the course of the day are present at the same time. Rather, visitors have historically visited CCF for varying lengths of time between the early morning and evening hours.

Issues related to illegal campfires, jumping or diving from cliffs, and dehydration are intensified by alcohol use.

Resource and Social Impacts

Increasing visitation to CCF over time has resulted in resource impacts at CCF, and along the SDRG Trail and Eagle Peak Road (Trail). Signage and other infrastructure, such as wire fencing, are increasingly being torn down by recreationists at CCF and along the trails. Littering has become commonplace at CCF and along the trails. User-created trails are causing erosion and are threatening the integrity of the existing trails. The “party atmosphere” that has developed at CCF over the past few years is often associated with illegal campfires, which risk igniting a wildfire in the San Diego River Gorge. Littering and the creation of social trails also impact wildlife and plant species, and degrade riparian areas and water quality. Federally listed endangered and threatened species that occur in the project area and may be impacted by the extreme levels of visitation observed in early 2011 include Arroyo Southwestern Toad, California Gnatcatcher, Least Bell’s Vireo, and Southwestern Willow Flycatcher.

The SDRG Trailhead parking lot can accommodate 29 vehicles. During busy periods at CCF in the past hundreds of motor vehicles spilled over into the SDCE neighborhood. With hundreds of motor vehicles consistently parking in the neighborhood in the past, neighbors from SDCE complained of trespass, unruly forest visitor behavior, traffic congestion, and speeding on neighborhood streets, and also frequently reported that large groups are partying at CCF or the SDRG Trailhead.

1.4 - Purpose and Need for Action _____

For the following reasons there is a need for managing visitor use at CCF:

1. Visitation at CCF on a busy weekend day or holiday has increased from approximately 210 to 240 people in 2007 to approximately 840 to 1,140 in 2011 with resulting impacts to natural and social resources.
2. Risky visitor activities at CCF have resulted in deaths, severe injuries, heat-related illness, and dehydration. Instances of heat-related illness and dehydration in particular have increased in recent years.
3. The ongoing growth in visitation levels at CCF has been linked to increasing vandalism of recreation infrastructure, littering, and user-created trails. Associated impacts occur to wildlife and plant species, riparian areas, and water quality. Littering and the creation of social trails potentially impact a number of federally listed endangered and threatened species in the project area, including Arroyo Southwestern Toad, California Gnatcatcher, Least Bell’s Vireo, and Southwestern Willow Flycatcher.
4. Increasing visitation at CCF has resulted in overflow parking in the SDCE neighborhood growing from approximately 50-60 vehicles on a typical busy day in 2007 to 200-300 on a typical busy day and more than 700 on the busiest day observed in 2011. This increased level of overflow parking in SDCE is associated with a growth in the number of complaints about private property trespass, unruly forest visitor behavior, and traffic congestion on neighborhood streets.

In meeting this need, the proposal must meet the following purposes:

1. Provide for public access to and use of CCF. There is a high level of public demand for recreational opportunities at CCF and it is expected that this demand will continue or perhaps grow. CCF is an important public resource, and it is therefore necessary to provide reasonable access to this unique and popular natural feature.

2. Provide for public safety. The current party atmosphere and associated alcohol use have created an unsafe situation due to the steep cliff faces surrounding CCF along with difficult hiking conditions on the SDRC Trail and Eagle Peak Road (Trail).
3. Manage for an environmentally sustainable ecosystem and positive visitor experience. Currently visitors litter and create social trails, which damage vegetation; cause soil erosion; degrade riparian areas and water quality; and potentially disturb endangered, threatened, and sensitive species.
4. Reduce overflow parking impacts in SDCE.

Relevant Cleveland National Forest Land Management Plan Direction

The proposed action works toward the forest management goals as described in the 2005 Revised Cleveland National Forest Land Management Plan (Forest Plan) (USDA, 2005). Forest Plan strategies, standards, and guidelines relevant to the proposed visitor use permit area are summarized below:

REC - 2 – Sustainable Use and Environmental Design (Forest Plan Part 2, CNF Strategy, pg. 103)

Analyze, stabilize and restore areas where visitor use is negatively affecting recreation experiences, public safety and environmental resources. Manage visitor use within the limits of identified capacities:

- Implement control measures in specific high-use areas as use levels become a concern.
- Implement Adaptive Mitigation for Recreation Uses in existing and new recreation sites and uses whenever a conflict between uses or sensitive resources is detected.

TRANS - 3 – Improve Trails (Forest Plan Part 2, CNF Strategy, pg. 109)

Develop an interconnected, shared-use trail network where compatible and support facilities compliment local, regional and national trails and open space, and also enhance day-use opportunities and access for the general public:

- Construct and maintain the trail network to levels commensurate with area objectives, sustainable resource conditions, user safety, and the type and level of use. Convert ecologically sustainable unclassified roads and trails, and other roads that meet the need for trail-based recreation.
- Maintain and/or develop access points and connecting trails linked to the surrounding communities and to create opportunities for non-motorized trips of short duration.
- New trail construction projects will emphasize development of partnerships and cooperative agreements for construction, future maintenance, and reconstruction.

Fish and Wildlife Standards (Forest Plan Part 3: Design Criteria for Southern California Forests, pgs. 6-8).

- **S11:** When occupied or suitable habitat for a threatened, endangered, proposed, candidate or sensitive (TEPCS) species is present on an ongoing or proposed project site, consider species guidance documents to develop project-specific or activity-specific design criteria. This guidance is intended to provide a range of possible conservation measures that may be selectively applied during site specific planning to avoid, minimize or mitigate negative long-term effects on TEPCS species and habitat.
- **S12:** When implementing new projects in areas that provide for threatened, endangered, proposed, and candidate species, use design criteria and conservation practices so that discretionary uses and facilities promote the conservation and recovery of these species and their habitats. Accept short-

term impacts where long-term effects would provide a net benefit for the species and its habitat where needed to achieve multiple-use objectives.

- **S24:** Mitigate impacts of ongoing uses and management activities on threatened, endangered, proposed, and candidate species.
- **S33.** Manage Special Interest Areas so that activities and discretionary uses are either neutral or beneficial for the resource values for which the area was established. Accept short-term adverse impacts to these resource values if such impacts will be compensated by the accrual of long-term benefit.

Soil, Water, Riparian and Heritage Standards (Forest Plan Part 3: Design Criteria for Southern California Forests, pg. 11).

- **S50:** Mitigate long term impacts from recreation use to soil, watershed, riparian or heritage resources.

Appendix D – Adaptive Mitigation for Recreation Uses & Recreation Implementation Guidelines (Forest Plan Part 3: Design Criteria for Southern California Forests, pgs. 63-64).

These guidelines apply to all existing and new recreation sites and uses whenever a conflict between uses or sensitive resources is detected. Sensitive resources include threatened, endangered, proposed, candidate, and sensitive species and habitats; riparian habitats, soil and watersheds; heritage resources; user conflicts; or other resources. The management actions will be implemented in the order (education; perimeter control; management presence; redirection of use-if appropriate) listed below unless analysis of the conflict clearly indicates a stronger measure is immediately necessary. The actions and practices include, but are not limited to:

1. Conservation Education

- Use information networks, including public service announcements, internet sites and links, and visitor guides, newsletters to communicate information regarding sensitive resources.
- Install and maintain appropriate multilingual information boards, interpretive panels and regulatory signs at developed sites and dispersed areas within sites of sensitive resources.

2. Perimeter Control

- Modify visitor access to manage use. Install and maintain appropriate fencing or other barriers to protect sensitive resource areas. Limit the number of users at the site or area.

3. Presence

- Provide adequate management presence to ensure protection of sensitive resources. This presence could include Forest Service personnel, peer education, concessionaires, other permit holders, and volunteer support.

4. Direct Action

- Where visitor use is restricted – a) Limit or control use at developed recreation sites and areas through a permit system; b) When other actions are ineffective enact and enforce Forest Orders to protect sensitive resource areas through use of seasonal or temporary closures; c) Seek opportunities

to proactively design and locate new facilities and areas for re-distributing human use away from sensitive resources.

- Limit visitor use of recreation sites and areas through diurnal, seasonal or temporary closures during critical life cycle periods for affected threatened, endangered, proposed, candidate, and sensitive species.

Upper San Diego River: Standards, Desired Conditions and Program Emphasis (Forest Plan Part 2, CNF Strategy, pg. 67).

- Maintain as a remote, natural appearing landscape that functions as a respite for the surrounding urban population. Attributes to be preserved (or restored) over time include a diverse mosaic of natural habitats, rare plant and wildlife communities and the undisturbed character and panoramic views and features. Opportunities for developed recreation and trails (including the Trans-County Trail) improve through time. Program emphasis for the Upper San Diego River Place includes maintaining a natural appearing setting for dispersed recreation activities and to increase public understanding of natural systems through education and interpretation. Recreation management in the vicinity of CCF will be improved. Acquire rights-of-way to improve administrative and public access. Plan a trail system and develop support facilities commensurate with forest plan objectives to allow safe access to popular destinations, including an east/west section of the Trans-County Trail. Support the efforts of the San Diego River Conservancy to the extent feasible. Assess the landscape for opportunities to provide developed campgrounds and enhanced trail-based recreation. Conserve biological values associated with the Research natural Areas. Monitor coastal sage scrub in the San Diego River bottom and take adaptive management measures to protect important habitats as necessary. Develop management plans for special areas.

1.5 - Decision Framework

The environmental assessment (EA) discloses environmental effects of the no-action alternative, a proposed action, and a permanent closure alternative. The **Responsible Official, the Cleveland National Forest Supervisor**, will make a decision based on the review of the EA. The Forest Supervisor's decision will include:

1. Whether to proceed with the proposed action, "no action," or permanent closure alternative.
2. Whether the decision that is selected would have significant impacts. If a determination is made that no impact is significant, then a "Finding of No Significant Impact" (FONSI) would be prepared. Significant impacts would require the preparation of an Environmental Impact Statement [40 CFR 1501.4 (c) and (e)].

The Forest Supervisor's decision will be documented in a separate Decision Notice (FSH, 1909.15 - 40).

1.6 - Public Involvement

The proposal was first listed in the Schedule of Proposed Actions in September, 2011. A legal notice offering a 30 day scoping period on the proposed action was printed in the San Diego *Union Tribune* on December 13, 2011. The Forest Service also posted notices at the two trailheads that lead to CCF, a hardware store in the San Diego Country Estates, in the front office of the Palomar Ranger District, and on a number of social media sites with dedicated CCF pages. Finally, the proposal was provided to interested agencies, groups and individuals, and Tribes for input during scoping between December 13, 2011 and January 12, 2012, including to the SDCE Association and its members. A legal notice of the EA's comment period was published in the San Diego *Union Tribune* on April 17, 2012. At this time the draft EA was provided to the same groups, organizations, Tribes, and individuals contacted during scoping. In addition, as part of the public involvement process the agency convened a series of three stakeholder dialogue sessions

between August and October, 2011. These dialogue sessions were attended by representatives of recreation user groups, local governments, and elected officials. The notes from these dialogue sessions can be found in the project record.

All input received during the course of scoping, the comment period, and other public involvement activities was considered by an interdisciplinary team (IDT). A summary and response to comments received during the scoping and comment periods can be found in Appendix C. Thirty (30) scoping comments, seventeen (17) comment period comments, and notes about other public involvement activities can be found in the project record. These comments either resulted in new project design features or did not generate significant issues related to the proposal.

1.7 - Issues

Based on internal and external scoping, the interdisciplinary team (ID team) developed a list of issues. The ID team decided the following issues warranted full analysis in this EA to determine their significance and/or contributed to project design features.

- **Impacts to human health and safety:** specifically concerns related to heat-related illness, alcohol use, and visitors jumping from the cliffs surrounding CCF.
- **Increasing visitation trends that have led to traffic congestion and parking in the adjacent SDCE neighborhood:** including forest visitors parking on County roads, traffic congestion on neighborhood streets, littering, and private property trespassing.
- **Impacts to soils:** specifically erosion resulting from the proliferation of user-created trails.
- **Impacts to water quality:** both downstream and immediately on site.
- **Impacts to wildlife:** including federally listed threatened and endangered species, Forest Service Management Indicator Species, and animal species on the R5 Regional Forester Sensitive animal species list.
- **Impacts to vegetation:** including riparian vegetation, R5 Regional Forester Sensitive plant species, Forest Service Management Indicator Species, and federally listed threatened and endangered species.
- **Impacts to scenery and recreation:** specifically recreation access, the quality of visitor experiences, and scenery.
- **Impacts to cultural resources:** including pre-historic and historic sites.
- **Environmental justice concerns:** specifically the impact of the \$6 administrative fee associated with the proposed visitor use permit on low-income communities.

2 - ALTERNATIVES, INCLUDING THE PROPOSED ACTION

This chapter describes and compares the alternatives considered for this project. This chapter includes a description of each alternative, a table that allows for the comparison of the alternatives, an overview of changes to the proposal over the course of the project, and a discussion of alternatives considered by eliminated from detailed study.

2.1 - Alternatives

2.1.1 - Alternative 1

No Action

Under the No Action alternative, historic management would continue to guide management of the project area. A visitor use permit area would not be established in the vicinity of CCF; a permanent alcohol prohibition would not be implemented at CCF, along the SDRG Trail and Eagle Peak Road (Trail), or at the SDRG and Saddleback Trailheads; the cliff faces at CCF would not be closed to public access; and the temporary forest orders that have been instituted in the project area would expire. Access to CCF, from both the SDRG and Saddleback Trailheads, would remain unlimited.

2.1.2 - Alternative 2

Proposed Action

The proposed action includes the designation of a visitor use permit area in the immediate vicinity of CCF to manage visitation at this site in order to decrease the severity of resource impacts at CCF, and along the SDRG Trail and Eagle Peak Road (Trail). The proposed visitor use permit area is illustrated graphically in Figure 2, Visitor Use Permit Area Detail, on page 4. It also includes Forest Orders that prohibit the possession of alcohol at CCF, along the SDRG Trail and Eagle Peak Road (Trail), and at the SDRG and Saddleback Trailheads (Figure 3, page 5), as well as the closure of the cliff faces at CCF to public access (Figure 4, page 6), in order to address public health and safety concerns. The Forest Service assumes that by managing visitation at CCF and altering the typical visitor clientele that these actions will also reduce social impacts in SDCE as compared to those observed in the past.

The visitor use permit system would allow visitors to reserve the opportunity to visit the visitor use permit area in the immediate vicinity of CCF via the National Recreation Reservation Service (NRRS). NRRS allows visitors to make reservations online or by phone.³ In addition to allowing members of the public to reserve the opportunity to visit the visitor use permit area on a given day, NRRS would present the Forest Service with a novel opportunity to provide visitors – as part of their visitor use permit package – with information related to public health and safety and relevant Leave No Trace recreation principles. Specifically, the Forest Service would use the NRRS system to include educational information on the following topics in the visitor use permit packet:

- The length and difficulty of the hike to CCF
- How to prepare for the hike, including proper attire and footwear, and the need to bring adequate food and water
- Local weather patterns and potential hazards along the trail and at CCF
- Area regulations, including the alcohol prohibition and closure of cliff faces at CCF
- Proper techniques for the disposal of human waste and trash along the trail and in the vicinity of water bodies (“Leave No Trace” and “Pack it in, pack it out” practices)
- Limiting resource impacts by staying on designated trails
- Respecting wildlife and plant communities

The visitor use permit is designed to manage the number of groups allowed to access CCF from the SDRG and Saddleback Trailheads on a given day; this number – set initially at 75 – is based on a balance between

³ NRRS currently charges an administrative fee of \$6 per visitor use permit reserved. This administrative cost is distinct from a recreation fee, and is not collected or retained by the Forest Service. See Appendix B, Cedar Creek Falls Visitor Use Permit System Questions and Answers, for additional information about the mechanics of the proposed visitor use permit system.

resource and social impacts, as well as providing continued public access to this popular site.⁴ A visitor use permit would allow a group of up to 5 people – the maximum capacity of a typical passenger vehicle – to access the visitor use permit area surrounding CCF.⁵ The visitor use permit system would therefore initially allow a maximum of 375 recreationists to access the visitor use permit area in a given day. Figure 2 on page 4, Visitor Use Permit Area Detail, provides a map of the visitor use permit area. No visitor use permit would be required to hike on the SDRG Trail or Eagle Peak Road (Trail) for those visitors who do not seek to visit CCF.

While the initial proposal to issue 75 visitor use permits per day would allow a maximum of 375 people to access the visitor use permit area surrounding CCF in one day, it is unlikely that each and every visitor use permit reserved would be filled to capacity with a group of 5. Rather, the number of people attached to each visitor use permit may be between 2.1 and 3.0 per vehicle (see Table 2, Section 1.3). If these estimates for average group size hold true at CCF, average daily visitation to the visitor use permit area may be between 158 and 225 people.

Table 3. Projected daily visitation to the CCF visitor use permit area, based on the initial proposal to issue 75 visitor use permits per day.

Estimated average group size	Source of estimate	Total average daily visitation
3	Forest Service staff observations	225
2.3	National Visitor Use Monitoring study (USDA, 2009)	173
2.1	San Diego Sheriff Department deputies (Sgt. Bavencoff, personal communication, January 10, 2012)	158

Regardless of average group size, the number of visitor use permits issued would be fluid and would be adjusted according to an adaptive management process, as described below in Section 2.1.2.1 of the EA. The ultimate goal of employing the adaptive management process is to recognize uncertainty in natural resource concerns and maintain the 2007 baseline condition of resources in the project area while providing for continued recreation access. Based on estimates of average daily visitation (Table 3) and average vehicular traffic at the trailheads that lead to CCF (Section 1.3), the initial figure of 75 visitor use permits represents a level of use similar to that which was observed in 2007. As such, this level of use will allow the Forest Service to strike a balance between experiencing unacceptable impacts as described in Section 1.3 of this document and allowing the public to enjoy continued access to CCF.

The requirement that visitors obtain a visitor use permit to visit CCF would be enforced under 36 CFR 261.50(a), Prohibitions in Areas Designated by Order. Currently, the fine for violating an Order in Southern California is \$75.

See Appendix B to this document for additional details about the mechanics of the visitor use permit.

⁴ The visitor use permit would apply to recreationists and other forest visitors seeking to visit CCF. In addition to issuing visitor use permits to recreationists and other forest visitors on a given day, the Forest Service reserves the right to grant volunteers engaged in monitoring or stewardship activities access to the visitor use permit area in order to complete their volunteer activities.

⁵ The Forest Service assumes that members of groups that have obtained a visitor use permit will travel together to the SDRG and Saddleback Trailheads in one vehicle.

In addition to the proposed visitor use permit area and adaptive management process, a number of other actions would address health and safety concerns in the project area. Specifically, the Forest Service would permanently prohibit the consumption of alcohol within the visitor use permit area, at the SDRG and Saddleback Trailheads, and within ¼ mile of the SDRG Trail and Eagle Peak Road (Trail) on National Forest System lands. It would also permanently close the cliff faces surrounding CCF to public use. For maps of these actions, see Figure 3, Cedar Creek Falls Alcohol Prohibition, on page 5; Figure 2, Visitor Use Permit Area Detail, on page 4; and Figure 4, Cedar Creek Falls Cliff Closure, on page 6.

The Forest Service would also make every effort possible to notify visitors about the visitor use permit required to visit CCF prior to their arrival at the trailhead. Proposed steps include:

- Installing “Visitor Use Permit Required to Visit CCF” or similar signs as appropriate to inform the public about the visitor use permit system.
- Issuing a news release prior to the implementation of the visitor use permit system.
- Posting notification about the visitor use permit system on the Cleveland National Forest website and on social media sites with dedicated CCF Pages.
- Posting information about alternate hikes in and around Ramona and Julian, CA on the Cleveland National Forest website and at the trailheads that lead to the CCF.

2.1.2.1 – Adaptive Management

Employing “adaptive management” would help the Cleveland National Forest find the right balance between providing recreation access to CCF and meeting intended environmental outcomes. According to 36 CFR 220.3, adaptive management is “a system of management practices based on clearly identified intended outcomes and monitoring to determine if management actions are meeting those outcomes; and, if not, to facilitate management changes that will best ensure that those outcomes are met or re-evaluated. Adaptive management stems from the recognition that knowledge about natural resource systems is sometimes uncertain.” Further, 36 CFR 220.5(e)(2) states that “an adaptive management proposal or alternative must clearly identify the adjustment(s) that may be made when monitoring during project implementation is not having its intended effect, or is causing unintended and undesirable effects. The [EA] must disclose not only the effect of the proposed action or alternative but also the effect of the adjustment.”

In order to allow the Forest Service to determine when project implementation is not having its intended effect, or is causing unintended and undesirable effects, the following metrics are proposed for monitoring. The intent is to address the concerns and needs related to natural resources as outlined in Sections 1.3 and 1.4 of this document, as well as additional resource concerns raised by members of the interdisciplinary team and the public. Each metric includes a threshold or limit which, if exceeded, would trigger a quarterly (every three months) 20% reduction in visitor use in the first year of project implementation. Adjustments to the number of visitor use permits issued in subsequent years would occur on a bi-annual (every six months) or annual basis as resource conditions warrant.

1. **Litter:** Marginal Condition Class within the visitor use permit area according to the *Rapid Trash Assessment Worksheet* for three consecutive weeks, based on weekly monitoring during the high water period (typically November through May).⁶

⁶ The *Rapid Trash Assessment Worksheet* was developed by the San Francisco Bay Regional Water Quality Control Board Surface Water Ambient Monitoring Program (SWAMP, 2007). Trash monitoring will be conducted weekly by District Staff during the high water period which varies year to year, though typically occurs between November and May. This period is usually characterized by the highest levels of use observed at Cedar Creek Falls. Trash monitoring will use trash monitoring forms modified from the *Rapid Trash Assessment Worksheet* to fit the needs of the project area. Other periodic monitoring may be conducted by the Forest Service, San Diego River Park Foundation, or volunteers. If monitoring finds that the presence of trash is

2. **Wetland and riparian health:** A negative annual trend within the visitor use permit area according to the California Rapid Assessment Method (CRAM), based on 2012 conditions.⁷ Additionally, any substantial increases in sedimentation to the stream channel would be evaluated on an as-needed basis by the Forest Hydrologist in accordance with the Forest Service Best Management Practices Form R30.⁸
3. **Erosion:** An increasing trend in the area impacted by user-created trails within the visitor use permit area, based on a 2012 baseline and twice-yearly monitoring.⁹

Table 4. Metrics that govern the increases and/or decreases in the number of visitor use permits issued

Metric	Frequency of Monitoring	Resource Value(s) Addressed
Litter	Weekly during high water period (typically November through May). Monthly outside of this period.	Water quality, scenery, human health
Wetland and Riparian Health	Annually	Water quality, wildlife habitat, threatened and endangered species, vegetation, soils
Erosion	Bi-annually	Soils, water quality, wildlife habitat, scenery, vegetation

The above metrics include a trigger point or threshold at which point natural resource conditions have exceeded acceptable conditions. If at any point any of these metrics were exceeded, the number of visitor use permits issued would be decreased by 20% on a quarterly basis in the first year of project implementation. Adjustments to the number of visitor use permits issued in subsequent years would occur on a bi-annual (every six months) or annual basis as resource conditions warrant. Use would continue to be decreased until no metric was exceeded, and therefore conditions in the project area were within the baseline condition.

If no metric were exceeded for a period of 3 months in the first year of project implementation the number of visitor use permits issued would be increased by 10% (potential increases in the number of visitor use permits issued in subsequent years would occur on a bi-annual or annual basis as resource conditions warranted).¹⁰ The intent of building the potential to increase the number of visitor use permits offered on a

in the Marginal Condition Class for a single week, education and enforcement activities will occur. The *Rapid Trash Assessment Worksheet* can be found on pages 40-42 of the SWAMP Final Technical Report, located at:

http://www.swrcb.ca.gov/rwqcb2/water_issues/programs/SWAMP/swamptrashreport.pdf.

⁷ California Rapid Assessment Method (CRAM) is a standardized protocol for assessing the health of wetlands and riparian habitats (Collins et al, 2008). CRAM is applicable to all wetland types and is designed for assessing ambient conditions within watersheds throughout the state of California. The CRAM Methodology has been adopted by the State and Regional Water Quality Control boards for consistency across water agencies and regions. Two sites will be identified in the visitor use permit area and the CRAM assessment will be conducted at each site once per year during the CRAM assessment window between February and April. CRAM assessments will be conducted by Cleveland National Forest Watershed Staff with assistance from the San Diego River Park Foundation or other volunteers. The CRAM form for riverine systems can be found at http://www.cramwetlands.org/documents/2008-09-30_CRAM_5.0.2_Field_Book_Riverine_FormOnly.pdf.

⁸ As it pertains to sedimentation, Forest Service Best Management Practices Form R30 documents whether there is little or no evidence of sediment movement, sediment movement evident but has not reached the stream channel, or evidence of sediment reaching the stream channel.

⁹ The area impacted by user-created trails will be measured using the ratio of mileage of user-created trails to system trails in the visitor use permit area.

¹⁰ Metrics that are monitored on a bi-annual or annual basis contain several three-month periods. In the first year of project implementation these metrics will not prevent a quarterly increase in the number of visitor use permits issued if all other proposed metrics are within the bounds of the baseline condition during periods when the longer-term metrics are not scheduled for

daily basis into the visitor use permit system is to balance the natural resource concerns outlined in Sections 1.3 and 1.4 of this document with the mandate in the Cleveland National Forest Land Management Plan to meet the needs of growing, urban, and diverse population (Part 2, pgs. 24-25) and to provide safe public access to popular recreation destinations in the CCF area (Part 2, pg. 67). The possibility of increasing the number of visitor use permits issued on a daily basis by 10% if no metric is exceeded for 3 months ensures that the Forest Service takes a more conservative approach to increasing than to decreasing the number of visitor use permits issued.

In addition to the possibility of increasing the number of visitor use permits issued each quarter, the Forest Service reserves the right under this alternative to suspend the requirement that visitors obtain a visitor use permit to visit CCF on days where use is projected to be low, defined as days when not all available visitor use permits are reserved. Reservation trends over time will suggest when use is likely to be low in the future, though it is likely that these days will occur outside of the summer season as well as outside of weekends, holidays, and school breaks throughout the rest of the year. Further, the Forest Service will only reduce the number of visitor use permits available when one or more triggers are exceeded by permitted visitors in the visitor use permit area. Finally, in order to ensure a balance between continued public access to CCF and resource concerns, the Forest Service would not reduce the number of visitor use permits to visit CCF below 30.

Requiring a visitor use permit in a limited area around CCF as well as potentially lifting the visitor use permit requirement on low-use days would allow the Forest Service to address the natural resource concerns outlined above in Sections 1.3 and 1.4 of this document while allowing for continued public access to the San Diego River Gorge by hikers, hunters, equestrians, and mountain bikers, which would minimize the loss of recreation access to National Forest System lands.

2.1.3 - Alternative 3

Permanent Closure

The permanent closure alternative designates a permanent closure area in the immediate vicinity of CCF to prohibit visitation to this site. The boundary of the permanent closure alternative is the same as the boundary of the proposed visitor use permit area, outlined in Alternative 2 and illustrated in Figure 2. A permanent closure would improve public health and safety, decrease the severity of resource impacts at CCF and along the SDRG Trail and Eagle Peak Road (Trail), and reduce impacts to the SDCE neighborhood, but would adversely impact recreational users seeking to visit CCF.

This alternative would not affect trail users or hunters seeking to access areas outside of the immediate area surrounding CCF.

2.1.4 - Changes Between the Draft EA and Final EA

Adaptive Management System

The adaptive management system metrics presented in the draft EA that were related to parking in SDCE and to helicopter rescues were dropped from the final EA. These metrics were dropped because the Forest Service does not have the authority to manage parking and congestion on County public roadways or to manage search and rescue operations (which are also the responsibility of the County). Because the Forest Service does not have the authority to undertake these actions it cannot tie its management of CCF to them.

monitoring. Following the first year of project implementation adjustments to the number of visitor use permits issued will occur bi-annually or annually as resource conditions warrant.

It should be noted that the Forest Service assumes that by managing public use at CCF issues pertaining to past patterns of parking in SDCE and helicopter rescues at CCF will be reduced.

Several clarifications to the adaptive management system were also made in the final EA. First, the final EA was clarified to note that the proposed adaptive management metrics apply only to the visitor use permit area. Second, the final EA was clarified to note that both increases and decreases in the number of visitor use permits offered will occur on a quarterly basis in the first year of project implementation; in no case will they occur more frequently. In subsequent years adjustments to the number of permits offered would be made on a bi-annually or annually as resource conditions warrant. Finally, the final EA was clarified to note that issues pertaining to public health and safety will be addressed by the proposed alcohol prohibition and cliff closure. The Forest Service also assumes that the management of public use at Cedar Creek Falls will improve public health and safety more broadly. Issues pertaining to resource impacts in the visitor use permit area will be addressed by the proposed adaptive management system.

2.1.5 - Alternatives Considered and Dropped

Eagle Peak Road Parking Improvements

The proposed action shared with the public during the scoping period contained a proposal to improve parking opportunities at the Saddleback Trailhead. The proposed parking improvements included the development of an unpaved parking area at the junction of Eagle Peak and Cedar Creek Roads, as well as the construction of a trail from the Saddleback Trailhead to the San Diego River Park Foundation's southernmost Eagle Peak Preserve property.

Analysis of the environmental effects of the proposed parking improvements by the interdisciplinary team determined that the development of an additional parking area outside of the existing dirt pullout used for parking at the Saddleback Trailhead and the construction of a trail to the San Diego River Park Foundation's Eagle Peak Preserve property would likely adversely impact critical habitat for the California Gnatcatcher. Potential archaeological issues related to the parking improvements as initially proposed also exist.

The Cleveland National Forest is additionally in the midst of a project to designate a number of areas as recommended wilderness, which could result in changes to land use designations to the east of Eagle Peak Road in the vicinity of the project area. Given the potential for new land use designations in this area, parking and recreation access issues may need to be revisited again in the future. Thus, due to unforeseen environmental impacts and the possibility of changes to land use designations, it was deemed that proposed parking improvements at the Saddleback Trailhead should be deferred until a future date. The title of this project was modified to reflect this determination.

It is recognized that deferring proposed parking improvements at the Saddleback Trailhead will result in the Cleveland National Forest being unable in the short term to solve ongoing emergency and administrative access concerns along Eagle Peak Road during busy periods at CCF as originally discussed in the proposal shared during the scoping period, which occur when parked vehicles restrict the right-of-way in narrow sections of the road. However, the proposed visitor use permit area described in Section 2.1.2 of the EA would allow the Forest Service to manage recreational use at CCF. The Forest Service therefore assumes that emergency and administrative access along Eagle Peak Road on many days would be improved due to managed visitation at CCF. Further, the Forest Service is working with the Sheriff's Department and California Highway Patrol with respect to actions within their jurisdictional authorities to address concerns related to emergency and administrative access.

2.1.6 - Alternatives Considered but Eliminated from Detailed Study

Construction of a New Trailhead on Ramona Oaks Road

Federal agencies are required by the National Environmental Policy Act (NEPA) to rigorously explore and objectively evaluate all reasonable alternatives, and briefly discuss the reasons for eliminating any alternatives that were not developed in detail (40 CFR 1502.4).

Many ideas have been suggested and explored in arriving at the current alternatives considered in detail in the EA. Addressing each of these suggestions in detail would create an unmanageably large number of alternatives that would not be helpful to the decision maker or public. Also, some recommendations would not fully address or would conflict with the purpose and need of this project, may result in new environmental or social impacts, and/or would be infeasible to implement.

The alternative to construct a trailhead at the end of Ramona Oaks Road would result in the construction of a new trailhead approximately 1/2 mile from the existing SDRG Trailhead. Under this alternative the existing trailhead would either remain open or be permanently closed and decommissioned.

This alternative does not fully address the concerns outlined in Sections 1.3 and 1.4 of the EA, and further would create new impacts to a different segment of the community in SDCE as well as new resource impacts. Specifically, trailhead design at the end of Ramona Oaks Road would require a larger footprint of disturbance on the landscape as compared to that which currently exists from informal public use at this location; trailhead construction at this location would adversely impact critical habitat for the endangered California gnatcatcher; construction of a trail off the end of Ramona Oaks Road would require the trail crossing a deep ravine, resulting in a complex project with potentially significant impacts to soil, water, and watershed resources; trailhead construction at the end of Ramona Oaks Road be very costly and an unwise use of taxpayer dollars in light of the 2009 Forest Service investment in the SDRG Trailhead; the long-term maintenance of a second trailhead facility in close proximity to the existing SDRG Trailhead is infeasible given current, predicted, and historic Forest Service budgetary trends; and topography at Ramona Oaks Road would make it difficult or impossible to conceal trailhead facilities from adjacent residences. The Forest Service has also heard on several occasions that the residents on the north side of Ramona Oaks Road do not support the construction of a trailhead at the end of Ramona Oaks Road due to potential impacts from a trailhead in their neighborhood.

2.1.7 - Comparison of Alternatives

This comparison of alternatives provides a summary of the effects of implementing each alternative. Information in the table is focused on instances where different levels of effects or outputs can be distinguished quantitatively or qualitatively among alternatives.

Table 5. Comparison of Alternatives

	Alternative 1 (No Action)	Alternative 2 (Proposed Action)	Alternative 3
Visitor use levels at CCF	Unlimited use would be allowed at CCF. According to historic use patterns in this area, average use at CCF during the spring months may average 700-1,100 people on a typical busy day and up to 2,400 people on busy days.	Initially 75 visitor use permits of up to 5 individuals per visitor use permit, or a maximum of 375 people, would be allowed to access CCF per day. However, based on historic use patterns, average daily use at CCF would likely be closer to 225. The number of visitor use permits issued could be adjusted upward or downward according to continued monitoring and a series of metrics (detailed in Section 2.1.2.1 of this document) that	All public access to and recreational use at CCF would be prohibited.

		address the natural resource concerns outlined in Sections 1.3 and 1.4 of this document.	
Access to trails and the San Diego River Gorge	Access to all parts of the San Diego River Gorge, the SDRG Trail, and the Eagle Peak Road (Trail) would be unlimited.	Access to the San Diego River Gorge, the SDRG Trail, and the Eagle Peak Road (Trail) would be unlimited. Access to CCF would be managed as described above.	Access to the San Diego River Gorge, the SDRG Trail, and the Eagle Peak Road (Trail) would be unlimited. All access to CCF would be prohibited.
Alcohol consumption	Forest visitors could possess and consume alcohol at CCF, at the SDRG and Saddleback Trailheads, and along the SDRG Trail and Eagle Peak Road (Trail) unless a temporary closure prohibited alcohol possession and consumption.	The consumption and possession of alcohol would be permanently prohibited in the visitor use permit area surrounding CCF, within a ¼ mile buffer of the SDRG Trail and Eagle Peak Road (Trail), and at the SDRG and Saddleback Trailheads.	Forest visitors could possess and consume alcohol at the SDRG and Saddleback Trailheads, and along the SDRG Trail and Eagle Peak Road (Trail). All public access to CCF would be permanently prohibited.
Access to cliff faces at CCF	Forest visitors could climb on all the cliff faces surrounding CCF unless a temporary closure closed the cliff faces to public access.	Visitors with a visitor use permit to visit CCF could visit CCF, but would be prohibited from climbing on the cliff faces surrounding CCF.	All public access to CCF and the cliff faces surrounding CCF would be permanently prohibited.
Rescues	The County of San Diego maintains the responsibility for all search and rescue operations in the vicinity of CCF. The increasing pattern of search and rescue needs as observed in early 2011 would likely continue.	The County of San Diego maintains the responsibility for all search and rescue operations in the vicinity of CCF. The Forest Service assumes that rescue patterns at CCF would be reduced from levels observed in early 2011 due to management of use levels at CCF under the visitor use permit system.	The County of San Diego maintains the responsibility for all search and rescue operations in the vicinity of CCF. Search and rescue needs at CCF would likely decrease because all public access to CCF would be permanently prohibited.
Resource impacts	The pattern of user-created trail proliferation and littering along the trails leading to CCF as observed in early 2011 would likely continue. A potential also exists for impacts to water quality, riparian health, soil, plants, and wildlife, including sensitive and endangered species.	Visitor use at CCF would be adjusted up or down such that no increasing trend in the area impacted by user-created trails existed, litter conditions were not rated as "marginal" or below for any three consecutive weeks according to the <i>Rapid Trash Assessment Worksheet</i> (see Section 2.1.2.1 of this document), and a negative trend for wetland and riparian health did not exist for any annual period according to the California Rapid Assessment Method (GRAM) (see Section 2.1.2.1 of this document). As such, any potential impacts to water quality, soils, scenery, wildlife, plants (including sensitive and endangered plant and animal species), and riparian health would be reduced compared to historic conditions.	Patterns of user-created trail proliferation and littering, as well as potential impacts to water quality, riparian health, soil, plants, and wildlife would likely decrease dramatically because all public access to CCF would be permanently prohibited.
Overflow parking impacts to San Diego Country Estates neighborhood	The County of San Diego has jurisdiction of all County maintained public roadways. Patterns of overflow parking and issues associated with	The County of San Diego has jurisdiction of all County maintained public roadways. The Forest Service assumes that patterns of overflow parking and issues	The County of San Diego has jurisdiction of all County maintained public roadways. Patterns of overflow parking and

parking as observed in early 2011 would likely continue.	associated with parking would be reduced from levels observed in early 2011 due to restrictions on use levels at CCF under the visitor use permit system.	issues associated with parking would likely decrease dramatically because all public access to CCF would be permanently prohibited.
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3 - ENVIRONMENTAL CONSEQUENCES

This chapter provides an overview of the physical, biological, and social environments of the project area and the potential changes to those environments that result from implementing each of the alternatives. Included in this analysis is an assessment of the cumulative effects of the alternatives on the physical, biological, and social environments. The cumulative effects on the physical, biological, and social environments are the same under the three alternatives. This chapter also presents the scientific and analytical basis for comparison of the three alternatives presented in chapter 2 of the EA.

3.0.1 – Cumulative Effects Common to the Physical, Biological, and Social Environments

This section evaluates the cumulative effects of the three alternatives to the physical, biological, and social environments.

Cumulative effects on the physical, biological, and social environments are the same under all alternatives. The cumulative effects are summarized directly below, followed by a discussion of the direct and indirect effects of each alternative on each of the physical, biological, and social environments.

Cumulative impacts are those impacts resulting from the incremental impact of an action when added to other past, present, or reasonably foreseeable actions.

The cumulative effects analysis area for this project is approximately 4,000 acres in size and includes an approximate 2 mile by 3 mile area of land between the San Diego Country Estates east to Saddleback and Eagle Peak Road. This area encompasses activities associated with the SDRG Trail, Eagle Peak Road (Trail), CCF, and other activities within the general area. This area also includes the current temporary Forest area closure of a 0.75 mile buffer along the SDRG Trail (Forest Order No. 2-12-04). Land ownership within the cumulative effects area is comprised of Forest Service, and private (San Diego Country Estate) lands. This area is characterized by open, rugged and relatively undisturbed land that is bordered to the north and west by the communities of San Diego Country Estates and Barona Mesa.

The principal historic action within this area has been non-motorized recreation and limited activities associated with the Helix Water District facilities downstream (the Helix property in the San Diego River Gorge was acquired by the Forest Service in July, 2012, so is now comprised entirely of National Forest System lands). Due to its rugged landscape and limited access, human activities are still relatively limited and confined to a small area within the San Diego River Gorge. Current activities within the cumulative effects analysis area include fuels management activities along the periphery of SDCE, limited tribal land use, and recreational activities at CCF. Potential future actions within the region include recreational use and management in the vicinity of CCF, and habitat restoration efforts within the San Diego River Watershed.

The primary Forest Service management emphasis for this area is maintaining a natural, undeveloped landscape for dispersed recreation, preserving and restoring sensitive natural resource values, and improving recreation management of the CCF area. Primary use occurs along existing roadways and trails with little activity outside of the road and trail corridors. Proposed future Forest Service management activities within the cumulative effects area include continued fuels management along the wildland-urban interface,

increased recreation management of the CCF area, management of feral pigs, the preservation and restoration of riparian and coastal sage scrub habitat within the area, and possible designation of some lands adjacent to the project area as recommended wilderness.

Management of feral pigs may include limited and occasional area closures to hunting during active trapping activities, which is currently under NEPA consideration, or result in the eradication of feral pigs in the San Diego River Gorge. Temporary closures to hunting or decreased feral pig populations may result in a slight hunting-related reduction in visitation to the San Diego River Gorge and area surrounding CCF. A slight reduction in hunting-related visitation to the project area would likely have beneficial effects to natural and social resources in this area.

In 2012 the Forest Service also acquired lands that are adjacent to CCF, which are known as the Helix property. The addition of the Helix property to the National Forest System could increase the number of visitors to this area, but would disperse them over a larger area. Future recreation management in this area that is beyond the scope of this project would be designed to address issues pertaining to natural and social resources, and would therefore have beneficial or neutral effects on these resources. Preservation and restoration of riparian and coastal sage scrub habitat in the project area would have beneficial effects on natural and social resources. Fuels management projects are designed through the NEPA process to have neutral effects on natural and social resources, and may in fact benefit these resources due to the reduction in severity of potential future wildfires.

If the Cleveland National Forest recommended wilderness designation and one or more wilderness areas were ultimately designated in the vicinity of CCF it is possible that the Saddleback Trailhead would become a focal point for access to these areas. Effects on natural and social resources in the project area that resulted from potential wilderness recommendation or designation would likely be neutral overall. However, beyond the project area wilderness designation could provide new wilderness recreation opportunities and may limit others, specifically those that depend on motorized use on Cedar Creek Road in the event that this road were ever to be closed. The potential for recommended wilderness would likely have little or no effect on residents of SDCE.

3.1 - Physical Environment

This section evaluates impacts of the three alternatives to soils and water.

3.1.1 - Soils

Soils mapped within the project area are generally derived from young fluvial deposits or granitic bedrock. Soils on low gradient slopes are Anderson or Ramona gravelly to very gravelly sandy loams. These soils have high rock content and are results of fluvial deposits from the San Diego River and/or Cedar Creek at some time in the past. Soils adjacent to the streams and in active channel areas are mapped Riverwash. These soils are young and have not had sufficient time to develop distinguishing morphological characteristics.

Direct and Indirect Effects of Alternative 1: No Action

The no action alternative would maintain the conditions within the project area as described in Section 1.3 of the EA. These conditions were not sufficient to protect soil resources. Visitor use was exceptionally heavy. On weekend days, visitor numbers were at times in the thousands and concentrated in a small area. Users created numerous trail shortcuts. By choosing the no action alternative, the soil resources of the Cleveland National Forest would not be protected and the relevant laws and agency guidance regarding soil resources would not be sufficiently addressed.

Direct and Indirect Effects of Alternative 2: Proposed Action

The proposed action would be superior for protecting soil resources because it would manage recreation and therefore reduce pressure on soils observed in the past. The proposed action also includes educational materials to discourage littering, improper disposal of human waste, and trampling riparian vegetation and streams. The proposed action would enact measures to prevent sedimentation in riparian areas and stream channels in the visitor use permit area. Overall the proposed action is better at protecting soil resources and following legal and agency guidance, direction, and regulation.

The adaptive management process defines a baseline condition for the visitor use permit area. As it relates to soil resources, this baseline condition is defined as a stable or negative trend in the area impacted by user created trails in the visitor use permit area, which can result in erosion. If this or other metrics related to environmental conditions were exceeded, the number of visitor use permits issued would be decreased in 20 percent increments until the overall baseline condition is achieved. If no metric were exceeded for a period of 3 months, the number of visitor use permits issued daily would be increased by 10 percent in order to provide for continued recreation demands in this area, so long as they remain within the bounds of the baseline condition. The metrics that define the overall baseline condition are defined in more depth in Section 2.1.2.1 of the EA.

Direct and Indirect Effects of Alternative 3: Permanent Closure

The permanent closure alternative would prohibit visitation to CCF. The permanent closure alternative would be beneficial for the protection of soil resources because it would vastly decrease recreation pressures observed in the past. The permanent closure alternative would reduce sedimentation into riparian areas and stream channels. Overall, the permanent closure alternative is superior in its protection of soil resources according to legal and agency guidance, direction, and regulation.

3.1.2 - Water

The project area is located within two 6th level Hydrologic Unit Code (HUC) watersheds: 16,300 acre Cedar Creek watershed (HUC = 180703040501) and to the north the 26,200 acre Ritchie Creek-San Diego River watershed (HUC = 180703040502). The watershed designations used by the Forest Service come from the National Hydrologic Database maintained by the United States Geologic Survey. The State of California and Regional Water Quality Control Boards use different watershed scales and boundaries.

The project area includes Cedar Creek and the scenic/recreation resource CCF. Adjacent and downstream from CCF and the proposed visitor use permit area is the San Diego River and associated floodplains designated by the State Department of Water Resources. This area contains important headwater and riparian habitat.

Direct and Indirect Effects of Alternative 1: No Action

The no action alternative would maintain the conditions within the project area as described in Section 1.3 of the EA. Management under these conditions was not sufficient to protect water resources. Visitor use was exceptionally heavy. On weekend days, visitor numbers were at times in the thousands and concentrated in a small area. There were hundreds of hours of human water contact, trash and litter was prominent, and users created numerous trail shortcuts. By choosing the no action alternative, the water resources of the Cleveland National Forest would not be protected and the relevant laws and agency guidance regarding water resources would not be sufficiently addressed.

Direct and Indirect Effects of Alternative 2: Proposed Action

The proposed action would be superior for protecting water resources because it would manage recreation pressures observed in the past. The proposed action also includes educational materials to discourage littering, improper disposal of human waste, and trampling riparian vegetation and stream conditions. The

proposed action would lower the hours of water contact recreation and enact measures to prevent sedimentation into riparian areas and stream channels. Overall the proposed action is sufficient at protecting watershed resources and following legal and agency guidance, direction, and regulation.

The adaptive management process defines a baseline condition for the visitor use permit area. As it relates to water resources, this baseline condition is defined by metrics pertaining to litter, wetland and riparian health, sedimentation, and erosion. Under this condition, litter conditions would not be classified as marginal for any period of three weeks or more according to a rapid trash assessment, California Rapid Assessment Method trends for wetland and riparian health would not exhibit a negative annual trend, substantial increases in stream channel sedimentation would not occur, and there would be no increasing trend in the area impacted by user-created trails in the visitor use permit area. If these metrics exceeded, the number of visitor use permits issued would be decreased in accordance with the adaptive management system until the overall baseline condition is achieved. If no metric were exceeded for a period of 3 months, the number of visitor use permits issued daily would be increased by 10 percent in order to provide for continued recreation demands in this area, so long as resource conditions remain acceptable. The metrics that define the overall baseline condition are defined in more depth in Section 2.1.2.1 of the EA.

Direct and Indirect Effects of Alternative 3: Permanent Closure

The permanent closure alternative would prohibit visitation to CCF. The permanent closure alternative would be beneficial for the protection of water resources because it would vastly decrease recreation pressure in this area as observed in the past. The permanent closure alternative would lower the hours of water contact recreation and reduce sedimentation in riparian areas and stream channels. Overall the permanent closure alternative is superior at protecting watershed resources and following legal and agency guidance, direction, and regulation.

3.2 - Biological Environment

This section evaluates impacts of the three alternatives to Wildlife, Listed Species, and Vegetation. Effects of the proposed action to listed species (proposed, endangered, threatened, or sensitive) are described in detail in a biological evaluation included in the project record.

3.2.1 - Wildlife

Direct and Indirect Effects of Alternative 1: No Action

Under the no action alternative it is reasonable to assume that visitor use to the CCF area will continue to increase beyond levels observed in early 2011. Impacts associated with this increased use of the area surrounding CCF will result in resource damage to both habitat and disturbance to wildlife species. Unmanaged recreation within this relatively small geographical area will eventually result in significant negative impacts to habitat, vegetation and water quality within this sensitive riparian area. Large unmanaged numbers of hikers will also negatively affect coastal sage scrub and California gnatcatcher habitat through the proliferation of user-created trails.

Direct and Indirect Effects of Alternative 2: Proposed Action

No negative direct or indirect effects are expected to wildlife species or habitat from the implementation of the *Cedar Creek Falls Visitor Use Permit System*. This project is an administrative action and does not involve any physical action or disturbance to listed species, habitat, or other pertinent natural resources.

Positive indirect effects from the proposed action include managing the number of people that visit the CCF area which is beneficial to wildlife species. Managing the number of people that visit the area will reduce direct human impacts and disturbance to species and their habitat, as well as associated impacts such as water quality issues, litter, noise, and habitat disturbance.

The adaptive management process defines a baseline condition for the visitor use permit area. As it relates to wildlife, this baseline condition is defined by metrics pertaining to wetland and riparian health, sedimentation, and erosion. Under this condition California Rapid Assessment Method trends for wetland and riparian health would not exhibit a negative annual trend, substantial increases in stream channel sedimentation would not occur, and there would be no increasing trend in the area impacted by user-created trails within the visitor use permit area. If these or other metrics related to environmental conditions were exceeded, the number of visitor use permits issued would be decreased in accordance with the adaptive management system until the overall baseline condition is achieved. If no metric were exceeded for a period of 3 months, the number of visitor use permits issued would be increased by 10 percent in order to provide for continued recreation demands in this area, so long as they remain within the bounds of the baseline condition. The metrics that define the overall baseline condition of the visitor use permit area are defined in more depth in Section 2.1.2.1 of the EA.

Direct and Indirect Effects of Alternative 3: Permanent Closure

No negative direct or indirect effects are expected to wildlife species from the implementation of Alternative 3. This alternative represents an administrative action and does not involve any physical action or disturbance to listed species, habitat, or other pertinent natural resources.

The vast majority of visitors to the San Diego River Gorge seek to visit CCF, and so under Alternative 3, which would prohibit all access to CCF, use of this area would likely dramatically decrease. Positive direct effects that would stem from a reduction in the number of people that visit the San Diego River Gorge include benefits to wildlife species. Controlling the number of people that visit the area would reduce direct human impacts and disturbance to species and their habitat, as well as associated impacts such as water quality issues, litter, noise, and habitat disturbance.

3.2.2 - Listed Species

Listed species considered in this analysis are those which are state or federally threatened, endangered or candidate, or on the Regional Forester's Sensitive Species List. Only those species that are known or have the potential to occur on the Cleveland National Forest or general vicinity of the project area are considered in this analysis, and only those species known or with the potential to occur within the project area are addressed in detail. Seventy-eight endangered, threatened, candidate, and sensitive plant and animal species are listed as occurring or potentially occurring on the Cleveland National Forest, including 26 animal and 52 plant species.

Information on listed species which have the potential to occur within the proposed project area were identified from field surveys, USDA Forest Service databases, files and reports, project wildlife reports, and the California Natural Diversity Data Base (CNDDB). Thirteen listed animal species are known or have the potential to occur within the proposed project area. Four are federally listed and 9 are listed as Forest Sensitive. Federally listed endangered and threatened species that are known to occur in the project area include Arroyo Southwestern Toad, California Gnatcatcher, Least Bell's Vireo, and Southwestern Willow Flycatcher. A habitat suitability analysis was conducted for listed plant species utilizing Forest records and information collected during field site visits of the project area. There is no modeled habitat for any federally-listed plant species at the trailhead or along the trail alignment. One Forest Listed Sensitive plant species potentially occurs within the project area. No additional listed species were discovered, and there are no known records for the project area for any other listed plant species. Additional information regarding listed species can be found in the Biological Evaluation/Biological Assessment in the project record.

Direct and Indirect Effects of Alternative 1: No Action

Under the Alternative 1 it is reasonable to assume that visitor use to the CCF area will continue to increase beyond levels observed in early 2011. Impacts associated with this increased use of the area surrounding

CCF will result in resource damage to both habitat and disturbance to wildlife species, including Arroyo Southwestern Toad, California Gnatcatcher, Least Bell's Vireo, and Southwestern Willow Flycatcher. Unmanaged recreation within this relatively small geographical area will eventually result in significant negative impacts to habitat, vegetation and water quality within this sensitive riparian area. Large unmanaged numbers of hikers will also negatively affect coastal sage scrub and California Gnatcatcher habitat through the proliferation of user-created trails.

Direct and Indirect Effects of Alternative 2: Proposed Action

No negative direct or indirect effects are expected to any federally listed or Forest Sensitive wildlife and plant species from the implementation of the *Cedar Creek Falls Visitor Use Permit System*. This project is an administrative action and does not involve any physical action or disturbance to listed species, habitat, or other pertinent natural resources.

Positive indirect effects from the proposed action include managing the number of people that visit CCF, which is beneficial to listed wildlife species that are known to occur in the project area, including Arroyo Southwestern Toad, California Gnatcatcher, Least Bell's Vireo, and Southwestern Willow Flycatcher. Controlling the number of people that visit CCF will reduce direct human impacts and disturbance to these listed species and their habitat, as well as associated impacts such as water quality issues, litter, noise, and habitat disturbance.

The adaptive management process defines a baseline condition for the visitor use permit area. As it relates to listed species, this baseline condition is defined by metrics pertaining to wetland and riparian health, sedimentation, and erosion. Under this condition California Rapid Assessment Method trends for wetland and riparian health would not exhibit a negative annual trend, substantial increases in stream channel sedimentation would not occur, and there would be no increasing trend in the area impacted by user-created trails within the visitor use permit area. If these or other metrics related to environmental conditions were exceeded, the number of visitor use permits issued would be decreased in accordance with the adaptive management system until the overall baseline condition is achieved. If no metric were exceeded for a period of 3 months, the number of visitor use permits issued would be increased by 10 percent in order to provide for continued recreation demands in this area, so long as they remain within the bounds of the baseline condition. The metrics that define the overall baseline condition are defined in more depth in Section 2.1.2.1 of the EA.

Direct and Indirect Effects of Alternative 3: Permanent Closure

No negative direct or indirect effects are expected to any federally listed or Forest Sensitive wildlife and plant species from the implementation of Alternative 3. This alternative represents an administrative action and does not involve any physical action or disturbance to listed species, habitat, or other pertinent natural resources.

Positive indirect effects from Alternative 3 include managing the number of people that visit CCF, which would be beneficial to listed wildlife and plant species. Managing the number of people that visit CCF would reduce direct human impacts and disturbance to listed species and their habitat, as well as associated impacts such as water quality issues, litter, noise, and habitat disturbance.

3.2.3 - Vegetation

Direct and Indirect Effects of Alternative 1: No Action

Under the Alternative 1 it is reasonable to assume that visitor use to CCF will continue to increase beyond levels observed in early 2011. Impacts associated with this increased use of CCF will result in resource damage to both vegetation and habitat. Unmanaged recreation within this relatively small geographical area will eventually result in significant negative impacts to habitat, vegetation and water quality within this

sensitive riparian area. Large unmanaged numbers of hikers will also negatively affect coastal sage scrub and California Gnatcatcher habitat through the proliferation of user-created trails.

Direct and Indirect Effects of Alternative 2: Proposed Action

No negative direct or indirect effects are expected to any plant species from the implementation of the *Cedar Creek Falls Visitor Use Permit System*. This project is an administrative action and does not involve any physical action or disturbance to vegetation, habitat, or other pertinent natural resources.

Positive indirect effects from the proposed action include managing the number of people that visit the CCF area, which is beneficial to plant species. Managing the number of people that visit CCF will reduce direct human impacts and disturbance to plant species and their habitat, as well as associated impacts such as water quality issues, litter, noise, and habitat disturbance.

The adaptive management process defines a baseline condition for the visitor use permit area. As it relates to vegetation, this baseline condition is defined by metrics pertaining to wetland and riparian health, sedimentation, and erosion. Under this condition California Rapid Assessment Method trends for wetland and riparian health would not exhibit a negative annual trend, substantial increases in stream channel sedimentation would not occur, and there would be no increasing trend in the area impacted by user-created trails. If these or other metrics related to environmental conditions were exceeded, the number of visitor use permits issued would be decreased in accordance with the adaptive management system until the overall baseline condition is achieved. If no metric were exceeded for a period of 3 months, the number of visitor use permits issued would be increased by 10 percent in order to provide for continued recreation demands in this area, so long as they remain within the bounds of the baseline condition. The metrics that define the overall baseline condition are defined in more depth in Section 2.1.2.1 of the EA.

Direct and Indirect Effects of Alternative 3: Permanent Closure

No negative direct or indirect effects are expected to any plant species from the implementation of Alternative 3. This alternative represents an administrative action and does not involve any physical action or disturbance to vegetation, habitat, or other pertinent natural resources.

Positive indirect effects from the proposed action include managing the number of people that visit CCF, which is beneficial to plant species. Managing the number of people that visit the area will reduce direct human impacts and disturbance to plant species and their habitat, as well as associated impacts such as water quality issues, litter, noise, and habitat disturbance.

3.3 - Social Environment

This section evaluates impacts of the three alternatives to public health and safety, scenery management and recreation, heritage resources and tribal relations, and environmental justice.

3.3.1 - Public Health and Safety

Each year hikers who are unprepared for hot weather and the steep terrain in the area surrounding CCF are rescued by helicopter. A number of rescues were historically conducted each year, although in recent years an increased need for rescues has been reported by the County of San Diego. In 2010 the Sheriff's Department conducted 31 helicopter rescues in this area, and between January 1, 2011 and July 9, 2011 the conducted an additional 31 helicopter rescues.

CCF has become known as a party spot where visitors congregate, consume alcohol, and jump from the cliffs into the pool below the waterfall. Crowds frequently form to watch and cheer for the cliff jumpers. Since 1998 three individuals have died while jumping from the cliffs into the pool below CCF and others

have suffered severe injury, including permanent paralysis. In 2012 a visitor died from heat stroke on Eagle Peak Road (Trail).

Direct and Indirect Effects of Alternative 1: No Action

There would be a number of negative effects to the health and safety of recreationists at and around CCF under the no action alternative. Namely, the increasing trend of dehydration and heat exhaustion incidents on the trail to CCF, as well as the continued potential for injuries and fatalities at CCF, would likely continue.

Direct and Indirect Effects of Alternative 2: Proposed Action

Designating a visitor use permit area in the immediate vicinity of CCF has potential positive impacts to public health and safety. Historically, the vast majority of visitors to the San Diego River Gorge have sought to access CCF. The Forest Service assumes that a reduction in visitation to CCF may also result in the need for fewer helicopter rescues and could additionally shift the atmosphere at CCF from a “party spot” to a remote backcountry location. This potential shift in atmosphere has the potential to result in fewer visitors jumping from cliffs and consuming alcohol at CCF, which equates to a lower risk of injury or death as well as fewer instances of dehydration and heat exhaustion.

Implementing a permanent alcohol prohibition at CCF, along the SDRG Trail and Eagle Peak Road (Trail), and at the SDRG and Saddleback Trailheads, and implementing permanent cliff closures would have a positive impact on public health and safety at CCF and along the SDRG Trail and Eagle Peak Road (Trail). These measures would encourage a shift in the atmosphere at CCF from a “party spot” to a remote backcountry location. Because recreationists would be prohibited from climbing on the cliff faces surrounding CCF and hence jumping into the pool below CCF, visitors would face a dramatically reduced likelihood than in the past of suffering severe injury or death in the vicinity of CCF. The permanent alcohol prohibition would also likely result in fewer instances of dehydration than have been observed in the past. Together these measures would likely contribute to a reduced need for search and rescue operations at and around CCF.

No construction is planned for this project outside of installing signage in the vicinity of the project area. Installation of signage presents a potential for minor short-term safety risks to workers. In accordance with Forest Service Health and Safety Code Handbook (FSH 6709.4), working with tools requires all Forest Service employees to use proper personal protective equipment (PPE). Monitoring for compliance with the Forest Service safety code would be accomplished through on-site inspections and reviews of accident reports. Potential short term-safety risks associated with signage installation are countered by long-term health and safety benefits to the recreating public.

Direct and Indirect Effects of Alternative 3: Permanent Closure

Permanently closing the area in the immediate vicinity of CCF has positive impacts to public health and safety. Historically, the vast majority of visitors to the San Diego River Gorge have sought to access CCF. As such, prohibiting visitation to CCF would also likely result in the need for search and rescue operations, and eliminate the risks associated with visitors jumping from cliffs and consuming alcohol at CCF.

3.3.2 - Scenery and Recreation

CCF is located in a canyon bordered by steep walls, which opens into a flat valley where Cedar Creek flows into the San Diego River. The Saddleback Trailhead is characterized by a flat, graded area that recreationists use for parking. This flat area is adjacent to the junction of Eagle Peak and Cedar Creek Roads. The scenic integrity objective for the area encompassed by the proposed action is high. A scenic integrity objective of high means that the landscape appears unaltered.

Chaparral communities dominate the hillsides above CCF and along Eagle Peak Road, though Engelmann oaks can be found in patches along Eagle Peak Road. This area is very rural – few residences can be seen from Eagle Peak Road, which is traveled primarily by recreationists and residents. From the Saddleback Trailhead the scenery is dominated by National Forest System lands to the south, east, and west. Eagle Peak Preserve is located approximately two-tenths of a mile to the north, and still further north are additional private lands.

Recreation in this area includes a number of traditional Forest Service offerings, including hiking, equestrian use, mountain biking, and swimming in the pool beneath CCF. Camping in the vicinity of the project area has historically been limited due to challenging terrain, and most existing campsites are illegal due to their proximity to streams and trails. The vast majority of recreation use in this area is day use and occurs at CCF. However, the San Diego River Gorge has become quite well known for pig hunting in recent years, and a small number of visitors use Eagle Peak and Cedar Creek Roads for motorcycle touring. It should be pointed out that only highway-legal motorcycles are allowed on Eagle Peak Road. The Cleveland National Forest also maintains a picnic area at the SDRG Trailhead.

Direct and Indirect Effects of Alternative 1: No Action

There would be no direct effects to recreation or visual quality under the no action alternative. According to the Cleveland National Forest Land Management Plan, the desired condition of “the Upper San Diego River Place is maintained as a remote, natural appearing landscape that functions as respite for the surrounding urban population” (67). Indirect effects of this alternative on recreation include impacts to the remote character of this landscape due to high levels of visitation and the “party” atmosphere at CCF, as well as the destruction of recreation infrastructure along the SDRG Trail by some recreationists. Indirect effects on scenery include the proliferation of user-created trails and littering at CCF and along the trails as a historic consequence of high levels of visitation.

Direct and Indirect Effects of Alternative 2: Proposed Action

The designation of a visitor use permit area in the immediate vicinity of CCF according to the proposed action would negatively impact recreation opportunities in this area in that it would manage the number of people allowed to access CCF; visitors would no longer be able to spontaneously visit this popular recreation destination. However, aside from prohibiting access to the cliff faces surrounding CCF and therefore jumping from the cliffs into the pool below CCF and rock climbing, the proposed action would have no effect on the breadth of recreation opportunities available in the San Diego River Gorge. The loss of the opportunity to cliff jump, which is not a traditional Forest Service recreational activity, would be offset by associated improvements to public health and safety. It is noted that an established rock climbing route exists in this area and will be affected by the closure of the cliff faces. However, this route is not known to be one that is popular or even actively used.

By managing the number of recreationists allowed to access CCF on a given day the proposed action would have an indirect positive impact on the quality of the recreation experience in the visitor use permit area and on the trails leading to CCF. This indirect benefit would result from better alignment with the Cleveland National Forest Land Management Plan, which classifies this area as a “remote, natural appearing landscape that functions as respite for the surrounding urban population” (USDA, 2005: 67).

Because management of the number of people allowed to access CCF under the proposed action is balanced by an increase in the quality of the recreation experience, and because the visitor use permit area would be limited in size and additionally there are many other dispersed recreation settings on the forest, the impacts of the proposed action to overall recreation opportunities on the Palomar Ranger District would be minimal.

The Forest Service assumes that designating a visitor use permit area would result in a positive effect on scenery across the broader landscape by reducing overall recreation demand and the associated impacts stemming from the proliferation of user-created trails and littering.

The adaptive management process defines a baseline condition for the CCF area. As it relates to recreation and scenery, this baseline condition is defined by metrics pertaining to litter and erosion. Under the baseline condition, litter conditions would not be classified as marginal for any period of three weeks or more according to a rapid trash assessment and no increasing trend in the area impacted by user-created trails would exist. If these or other metrics related to environmental conditions were exceeded, the number of visitor use permits issued would be decreased in accordance with the adaptive management system until the overall baseline condition is achieved. If no metric were exceeded for a period of 3 months, the number of visitor use permits issued would be increased by 10 percent in order to provide for continued recreation demands in this area, so long as they remain within the bounds of the baseline condition. The metrics that define the overall baseline condition are defined in more depth in Section 2.1.2 of this document.

Direct and Indirect Effects of Alternative 3: Permanent Closure

Implementing a permanent closure in the vicinity of CCF would have a direct, negative effect on recreation in the San Diego River Gorge. This would likely occur because the majority of visitors to this area seek to visit CCF, and many of these visitors swim in the pool below CCF. A permanent closure in the vicinity of CCF would therefore reduce the scope of recreation opportunities on this part of the forest and would further force a potentially substantial number of recreationists to find recreation opportunities elsewhere.

Although a permanent closure in the vicinity of CCF is associated with direct, negative effects, this alternatively may also result in several indirect benefits to recreation opportunities in the San Diego River Gorge. In particular, this alternative would not affect trail users or hunters that do not seek to visit CCF, which means that recreation experiences in this broader area would be characterized by a greater degree of solitude and may therefore be of higher quality to many visitors.

Implementing a permanent closure may have a positive effect on scenery by reducing the overall demand on the landscape and the associated impacts stemming from the proliferation of user-created trails and littering.

3.3.3 – Heritage and Tribal Relations

Direct and Indirect Effects of Alternative 1: No Action

There would be no direct, indirect, or cumulative effects to heritage resources under the no action alternative because this alternative does not include ground disturbing activities, nor are there ongoing impacts under the existing condition to known heritage sites within the project area.

The Barona Band of Mission Indians and Viejas Band of Kumeyaay Indians have expressed concerns to the Cleveland National Forest that recreational use at CCF increases the likelihood of trespass onto the Capitan Grande Indian Reservation. Under the no action alternative it is likely that unmanaged recreational use as observed prior to the July 9, 2011 temporary closure of CCF and the surrounding area (Forest Order Nos. 02-11-05 and 02-11-09) would begin to occur again at CCF. Tribal relations may be strained under this alternative because it does not address the trespass concerns expressed by the Barona Band of Mission Indians and Viejas Band of Kumeyaay Indians.

Direct and Indirect Effects of Alternative 2: Proposed Action

The establishment of the visitor use permit system itself will not result in any new ground disturbing activities or increased impacts to the visitor use permit area that would have the potential to have effects on historic properties, and would actually reduce potential impacts by managing the number of visitors to the area.

The installation of signage using t-posts is exempt from heritage review based on the Cleveland National Forest Heritage Resources Management Program Programmatic Agreement Compliance Form. If needed, the potential installation of signage using other materials will proceed after receiving a heritage exemption.

Under the proposed action recreational use at CCF would be managed via the proposed visitor use permit system. The Forest Service therefore assumes that fewer instances of trespass onto the Capitan Grande Indian Reservation would occur than may have occurred in the past, prior to the July 9, 2011 temporary closure of CCF (Forest Order Nos. 02-11-05 and 02-11-09).

Direct and Indirect Effects of Alternative 3: Permanent Closure

There would be no direct, indirect, or cumulative effects to heritage resources under the permanent closure alternative because this alternative does not include ground disturbing activities, nor are there ongoing impacts under the existing condition to known heritage sites within the project area.

Under the permanent closure alternative visitation to CCF would be prohibited, which would drastically limit visitation to the San Diego River Gorge as compared to historic levels. It is therefore likely that that fewer instances of trespass onto the Capitan Grande Indian would occur than may have occurred in the past, prior to the temporary closure of CCF (Forest Order Nos. 02-11-05 and 02-11-09).

3.3.4 – Adjacent Private Property (SDCE)

Potential impacts to private properties that are adjacent to the project area in SDCE are primarily a result of high levels of public visitation at CCF and in the San Diego River Gorge. These impacts include traffic congestion (see Section 3.3.1 of the EA), parking on County-maintained public roads in SDCE, trespass on private property, and undesirable public behavior at and around the SDRG Trailhead. However, a number of public comments also stated that many members of the community adjacent to the SDRG Trailhead moved to SDCE due to its proximity and uninhibited access to the Cleveland National Forest. Therefore potential actions to address the impacts as described above may result in decreased access by members of the SDCE community consistent with use restrictions experienced by the public more broadly.

Direct and Indirect Effects of Alternative 1: No Action

There would be a number of negative effects to adjacent property owners in SDCE under the no action alternative. Resident complaints of parking and traffic congestion on County-maintained public roads, private property trespass, and undesirable public behavior at and around the SDRG Trailhead by recreationists visiting CCF would continue. There is a high likelihood that visitation levels at CCF as observed in early 2011 (see Section 1.3 of the EA) would occur again. As would be the case for the general public, residents of SDCE living adjacent to the SDRG Trailhead would continue to have uninhibited access to CCF and the local trail system.

Direct and Indirect Effects of Alternative 2: Proposed Action

Designating a visitor use permit area in the immediate vicinity of CCF has potential positive impacts to private property adjacent to the SDRG Trailhead in SDCE. Historically, the vast majority of visitors to the San Diego River Gorge have sought to access CCF. As such, the Forest Service assumes that by managing the numbers of visitors to CCF via a visitor use permit system that issues pertaining to parking and congestion on public roadways, private property trespass, and undesirable public behavior at the SDRG Trailhead would likely be reduced. However, management of visitation at CCF would also apply to residents in SDCE, many of whom previously enjoyed uninhibited access to this area. The designation of a visitor use permit area in the vicinity of CCF would therefore require preplanning and a reservation on the part of SDCE residents as would be the case with the general public. It should also be noted that potentially high demand for visitor use permits on weekend and holiday days may lead to some would-be visitors, including those in SDCE, being unable to obtain a visitor use permit to visit CCF.

Implementing a permanent alcohol prohibition at CCF, along SDRG Trail and Eagle Peak Road (Trail), and at the SDRG and Saddleback Trailheads; and implementing permanent cliff closures would also likely have a positive impact on private property adjacent to the SDRG Trailhead in SDCE. These measures would encourage a shift in the atmosphere at CCF from a “party spot” to a remote backcountry location. This shift in atmosphere would encourage recreational use that is more consistent with traditional recreation on National Forest System lands, such as hiking and viewing scenery, rather than issues observed at CCF, including alcohol consumption and partying. The Forest Service assumes that a recreational visitor clientele that is similar to that traditionally observed on National Forest System lands would be less likely on average to trespass on private property and engage in undesirable public behaviors adjacent to private property.

Direct and Indirect Effects of Alternative 3: Permanent Closure

Permanently closing the area in the immediate vicinity of CCF would have positive impacts to private property adjacent to the SDRG Trailhead in SDCE. Historically, the vast majority of visitors to the San Diego River Gorge have sought to access CCF. As such, by prohibiting access to CCF it is likely that issues pertaining to parking and traffic congestion on public roadways, private property trespass, and undesirable public behavior in SDCE would be dramatically reduced. However, prohibiting visitation to CCF would apply to both the general public as well as residents of SDCE, many of whom previously enjoyed uninhibited access to CCF.

3.3.5 - Environmental Justice (Executive Order 12898)

Executive Order 12898 “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” requires that federal agencies make achieving environmental justice part of their mission by identifying and addressing, as appropriate, disproportionately high and adverse human health and environmental effects of their programs, policies, and activities on minority and low-income populations. The USDA Departmental Regulation on Environmental Justice (USDA, 1997) determination procedure for environmental justice issues states, “An environmental justice issue arises where conduct or action [by a USDA agency] may involve a disproportionately high and adverse environmental or human health effect on an identifiable low-income or minority population” (2).¹¹ As it pertains to this project, the Council on Environmental Quality (CEQ) “Environmental Justice Guidance Under the National Environmental Policy Act” states (8-9):

Agencies should consider the composition of the affected area to determine whether minority populations, low-income populations, or Indian tribes are present in the area affected by the proposed action, and if so whether there may be disproportionately high and adverse human health or environmental effects on minority populations, low income populations, or Indian tribes.

The proposed action and alternatives were assessed to determine whether they would disproportionately impact minority or low-income populations. Alternatives 1 and 3 would have equal effects on all members of the public including minority and low-income populations with the exception of members of the Barona Band of Mission Indians and Viejas Band of Kumeyaay Indians, who would be prohibited from visiting a portion of their ancestral territory under Alternative 3 if CCF were permanently closed to public access.

¹¹ Neither the USDA Departmental Regulation on Environmental Justice nor the CEQ Environmental Justice Guidance defines “low-income population.” As such, this project uses a Colorado Department of Transportation (CDOT) Technical Memorandum (CH2M Hill, 2004) definition of “low-income population.” The technical memorandum defines a “low-income population” as a population in which 30% or more of households are defined as “low-income” based on US Census tracts or Housing and Urban Development data. Because the CDOT project for which the technical memorandum was prepared leveraged federal funding, the technical memorandum defined “low-income population” in order to ensure compliance with Executive Order 12898.

The proposed action would have no effect on the civil rights of any individual. Women, Native Americans, and other minority groups would not be impacted by the proposed action any differently than any other public group.¹²

According to 2010 census data and maps included in the project record, poverty rates in communities surrounding the project area range from 0 to 20%. Across San Diego County more broadly, the nearest census tracts to the project area in which poverty rates exceed 30% and are therefore defined as “low-income populations” are located in Lakeside, CA; El Cajon, CA; and Escondido, CA. These census tracts are no closer than 20 miles from any access point to the project area. Therefore, there are no adverse effects of the proposed action on low-income communities since none are located in the area affected by or adjacent to the project area.

Executive Order 12898 does not mandate that agencies consider the effects of their projects on low-income households unless these households exist within low-income populations. Nonetheless, the \$6 NRRS administrative cost associated with reserving a visitor use permit may deter individuals from low-income households from visiting CCF. However, the overall impact of this administrative fee on recreationists more broadly would be very minor due to the large number of popular, high quality, and free recreational opportunities throughout San Diego County. Many of these recreational opportunities include water features, including waterfalls in numerous locations.

4 - GROUPS, ORGANIZATIONS, AND AGENCIES CONSULTED

The Forest Service consulted the following Tribes; Federal, State, and local agencies; and organizations during the development of this EA:

ID TEAM MEMBERS:

Criley, Lance	Environmental Coordinator
Fredrickson, Bjorn	IDT Leader, EA Editor, and Recreation Specialist
Friedlander, Joan	Unit Line Officer
Harvey, Steve	Forest Archaeologist
Heys, Jeffrey	Environmental Coordinator
Jimenez, Jason	Watershed Specialist
Metz, William	Deciding Official
Staudenmayer, Liz	GIS Specialist
Wells, Jeff	Wildlife Biologist
Winter, Kirsten	Forest Biologist

TRIBES:

Alvarez, Sheilla	Barona Band of Mission Indians
Butz, Don	Viejas Band of Kumeyaay Indians
Romero, Edwin	Chairman, Barona Band of Mission Indians

FEDERAL, STATE, AND LOCAL AGENCIES:

Bavencoff, Christina San Diego Sheriff's Department

¹² If unanticipated effects of the proposed action on a minority or low-income population affected by the proposed action were to arise, the Forest Service would consider making an exception to the requirement that the affected group obtain a visitor use permit to visit CCF.

Collins, Jeff	Office of County Supervisor Dianne Jacob
Downs, Janice	Office of County Supervisor Dianne Jacob
Gibson, Eric	County of San Diego Department of Planning and Land Use
Harrison, Michael	Office of Congressman Duncan Hunter
Hickman, Carl	County of San Diego Public Works Department
Jacob, Dianne	Supervisor, Second District, County of San Diego
Nelson, Mike	San Diego River Conservancy
Pasumarthi, Murali	County of San Diego Public Works Department
Piva, Jim	Ramona Community Planning Group
Perkins, Emily	San Diego Public Utilities Department
Richardson, Todd	San Diego Sheriff's Department
Sutton, Julie	San Diego Sheriff's Department

ORGANIZATIONS:

Allied Climbers of San Diego
 Backcountry Horsemen of California, San Diego
 Ramona Trails Association
 San Diego Country Estates Association
 San Diego River Park Foundation

5 - REFERENCES

- Bavencoff, Christina. 2012. Sergeant. San Diego Sheriff's Department. Pers. Comm.
- California Natural Resources Agency. 2007. "Frequently Asked Questions About CEQA." 12 June 2012
 <<http://ceres.ca.gov/ceqa/more/faq.html>>
- CH2M Hill. 2004. "US 36 Definition of 'Low-Income' for Environmental Analysis." 6 pp.
- Collins, J.N. E.D. Stein, M. Sutula, R. Clark, A.E. Fetscher, L. Grenier, C. Grosso, and A. Wiskind. 2008.
 "California Rapid Assessment Method (CRAM) for Wetlands." Version 5.0.2. 151 pp.
- Council on Environmental Quality. 1997. "Environmental Justice: Guidance Under the National
 Environmental Policy Act." 40 pp.
- County of San Diego Department of Public Works. 2012. "Public Road Standards." 66 pp.
- County of San Diego Land Use and Environment Group. 2011. "County of San Diego Guidelines for
 Determining Significance and Report Format and Content Requirements: Transportation and
 Traffic." Second Modification. 51 pp.
- Executive Order No. 12898. 59 Federal Register 32 (February 16, 1994). 5 pp.
- Richardson, Todd. 2012. Lieutenant. San Diego Sheriff's Department. Pers. Comm.
- San Diego County Traffic Advisory Committee. 2011. "Committee Report on Parking Prohibitions on
 Cathedral Way, Sugar Plum Way, Thornbush Road, Love Lane, Cherish Way and Bellbottom Way."
 5 pp.

Surface Water Ambient Monitoring Program. 2007. "A Rapid Trash Assessment Method Applied to Waters of the San Francisco Bay Region: Trash Measurement in Streams." Final Technical Report. 55 pp.

SWAMP. *See* Surface Water Ambient Monitoring Program.

USDA. *See* U.S. Department of Agriculture.

U.S. Department of Agriculture. *Departmental Regulation No. 5600-002: Environmental Justice* (December 15, 1997). 34 pp.

U.S. Department of Agriculture. Forest Service. 2005. *Land Management Plan: Cleveland National Forest*. San Diego, CA.

---. 2009. *National Visitor Use Monitoring Results*. Cleveland National Forest.

Appendix A: Tribal Consultation

Introduction

Forest Service Manual (FSM) section 1563.01b outlines the requirement that National Forests consult and coordinate with Tribes regarding National Forest System project planning and decision making. In accordance with Executive Order 13175, Consultation and Coordination with Indian Tribal Governments; Department Regulation 1340-007, Policies on America Indians and Alaska Natives; and Department Regulation 1350-001, Title 40 of the Code of Federal Regulations, parts 1500-1509 (40 CFR parts 1500-1509) require Federal agencies to invite Tribes to participate in the scoping process for projects and activities that affect Tribes and require NEPA documentation. Section 1501.2 requires that: “The Federal agency consults early with appropriate State and local agencies and Indian Tribes and with interested persons and organizations.” The below documentation of consultation and response to comments received from Tribes during consultation comply with the requirement that the Forest Service consult with Indian Tribes early in the NEPA process, in accordance with 40 CFR 1501.2(d)(2). Responses to comments received from State and local agencies, interested persons, and interested organizations can be found in Appendix C.

Response to Comments Received During Consultation

1. The Barona Band of Mission Indians and Viejas Band of Kumeyaay Indians have indicated that they do not support the Forest Service lifting the temporary closure order (Forest Order Nos. 02-11-05 and 02-11-09) first put into place in the area surrounding CCF in July, 2011. Of central concern regarding this area is that recreational access to CCF facilitates trespass onto the Capitan Grande Indian Reservation.

Response: The Cleveland National Forest is unable to indefinitely extend the current Forest Closure Order surrounding CCF to address concerns associated with trespass onto the Capitan Grande Indian Reservation. First, this concern is outside the scope of the purpose and need of the project. Second, permanently closing this area would be in direct contradiction to the Cleveland National Land Management Plan (2005), which emphasizes the provision and improvement of dispersed recreation opportunities in the San Diego River Gorge and around CCF (Part 2, pg. 67).

In an effort to reduce trespass into the Capitan Grande Reservation from the CCF area, the Cleveland National Forest has agreed to work in partnership with the Barona Band of Mission Indians and Viejas Band of Kumeyaay Indians to address this concern by analyzing the feasibility of several mitigation measures, including conducting cadastral survey of the shared Reservation and Forest boundary, and the installation of boundary markers and additional property ownership signage at the northern edge of the Capitan Grande Indian Reservation.

Appendix B: Cedar Creek Falls Visitor Use Permit Questions and Answers

Why is the Forest Service proposing to require visitors to obtain a visitor use permit to visit Cedar Creek Falls?

The Forest Service is proposing to require a visitor use permit to visit Cedar Creek Falls to address a variety of environmental and social issues that have resulted from busy periods of visitation at this site in the past. See Section 1.4 of this document for additional information.

Who needs to obtain a visitor use permit?

Visitors to Cedar Creek Falls and its immediate vicinity need to obtain a visitor use permit. The visitor use permit area is depicted in Figure 2 on page 4 of this document.

Hikers, bicyclists, and equestrians who would like to use the San Diego River Gorge Trail and/or Eagle Peak Road (Trail) would not be required to obtain a visitor use permit so long as they do not enter the visitor use permit area.

Where can I obtain a visitor use permit?

Visitor use permits must be obtained from the National Recreation Reservation Service (NRRS). Visitor use permits can be reserved online at www.recreation.gov or by toll-free phone at 1-877-444-6777.

How much does a visitor use permit cost? How is the fee for the visitor use permit used?

A visitor use permit costs \$6. The fee for the visitor use permit is an administrative fee retained by NRRS for the administration of the visitor use permit reservation system. This administrative fee is not retained by the Forest Service.

How many people can be included on a single visitor use permit?

Up to five people can be included on a visitor use permit. Groups that include more than five people would need to obtain more than one visitor use permit.

What if more than five people want to visit Cedar Creek Falls together? Can one person reserve more than one visitor use permit?

A single visitor use permit allows up to five people visit Cedar Creek Falls. If a group of more than five wants to visit Cedar Creek Falls the group would be required to obtain more than one visitor use permit. A single person can reserve more than one visitor use permit in order to accommodate groups larger than five so long as additional visitor use permits are available. Visitor use permits will be available for reservation on a first-come, first-served basis.

Do all members of a group of up to five visitors need to be listed on the visitor use permit?

Yes. Each member of a group of up to five visitors must be listed on the visitor use permit. All members must also carry government-issued photo identification unless they are dependent minors under the age of 16 with their parents.

What if I enter the visitor use permit area without obtaining a visitor use permit?

Any person entering the visitor use permit area without obtaining a visitor use permit will be subject to a \$75 fine and must leave the visitor use permit area.

What if I am listed on a visitor use permit but do not carry my ID with me?

Any visitor entering the visitor use permit area without government-issued identification, even if they are listed on a visitor use permit, will be subject to a \$75 fine and must leave the visitor use permit area.

What if I change my plans after reserving my visitor use permit?

After reserving your visitor use permit you will be able to make changes to the members of your group until you print your visitor use permit. Making changes to your visitor use permit will allow you to change the people you include in your group. You will only be able to print your visitor use permit within two weeks of your planned visit. Two weeks prior to your visit to Cedar Creek Falls NRRS will send you a reminder email to print your visitor use permit.

At this time you are not able to obtain a refund of your \$6 reservation fee from NRRS or change the date of your reservation if you are unable to visit Cedar Creek Falls on the day of your reservation. In the future it is possible that NRRS may allow changes in the date for your reservation at no additional cost so long as visitor use permits are still available on the day of your desired visit.

How many visitor use permits will be available each day?

Initially 75 visitor use permits will be available each day. The number of visitor use permits available may be adjusted up or down in accordance with environmental monitoring as described in Section 2.1.2.1 of this document. In order to ensure a balance between continued public access to Cedar Creek Falls and environmental conditions the Forest Service will not decrease the number of visitor use permits issued below 30. There is no maximum cap on the number of visitor use permits that could be issued if environmental conditions remained consistent with the monitoring metrics outlined in Section 2.1.2.1 of this document.

When will visitor use permits be available for reservation?

Visitor use permits will be available for reservation upon the implementation of the Cedar Creek Falls Visitor Use Permit System. Following this initial implementation of the Visitor Use Permit System permits will be available for reservation for the upcoming calendar year on December 26 of each year. For example, reservations will open for 2014 beginning on December 26, 2013. So long as visitor use permits are available, visitor use permits can be reserved at a minimum of 1 day prior to your visit.

Is the visitor use permit a parking permit?

No. The visitor use permit is not a parking permit. All visitors who enter the Cedar Creek Falls visitor use permit area must be listed on a visitor use permit. Visitors must also have their visitor use permit and government-issued photo identification on their person. Only dependent minors under the age of 16 who are present with their parents do not need to carry photo identification.

How will the visitor use permit prevent forest visitors from parking on County public roadways?

The visitor use permit will not prevent forest visitors from parking on County public roadways because the Forest Service does not have the jurisdictional authority to manage parking or traffic on County roads. However, the Forest Service assumes that by managing the number of people allowed to visit Cedar Creek Falls on a given day, issues pertaining to parking and traffic congestion on County public roadways will be less severe than during periods of busy use at Cedar Creek Falls as observed in the past.

Will the parking spaces at the San Diego River Gorge Trailhead be reserved for visitors to Cedar Creek Falls that have obtained a visitor use permit?

No. The parking spaces at the San Diego River Gorge Trailhead will not be reserved for visitors to Cedar Creek Falls that have obtained a visitor use permit. This trailhead, including the parking area, is for the use of all forest visitors regardless of their destination.

Does the visitor use permit allow me to consume alcohol and jump from the cliffs at Cedar Creek Falls?

The visitor use permit does not allow visitors to consume alcohol or jump from the cliffs at Cedar Creek Falls. Instead, it grants access to the visitor use permit area surrounding CCF. The possession and consumption of alcohol remains prohibited in this area and the cliffs surrounding Cedar Creek Falls remain closed to public access (including climbing on and jumping from the rocks and cliffs surrounding CCF) as outlined in Section 2.1.2 and depicted in Figure 4 on page 6 of this document.

Appendix C: Response to Comments Received During Scoping and Comment Period

Introduction

The Forest Service has documented, analyzed, and responded to the public comments received during the scoping and comment periods for the Cedar Creek Falls Visitor Use Permit System EA. Appendix C summarizes the comments received during the scoping and comment periods and provides the agency's response to those comments. These responses comply with 40 CFR 1503.4, Response to Comments, of the National Environmental Policy Act (NEPA) regulations.

Comment Analysis and Response

Public comments submitted regarding the Cedar Creek Falls Visitor Use Permit System were documented, compiled, categorized, and analyzed in order to capture all viewpoints and concerns submitted during the official scoping and comment periods. Information from meetings, letters, emails, and other sources are all included in this response to comments. The response to comments helps the USDA Forest Service clarify, adjust, or incorporate additional technical information into the EA.

Analysts read all public responses and identified separate comments within them that relate to a particular concern, resource consideration, and/or requested management action. Analysts categorized each comment into a topic area that is specifically relevant to this project. After categorizing comments, responses were written to address the public input that was received. The interdisciplinary team provided any recommendations for improvement to the proposed action to the Palomar District Ranger for review, consideration, and action. In general, the agency responds in the following five basic ways to substantive public comments, as prescribed in 40 CFR 1503.4:

1. Modifying alternatives.
2. Developing and analyzing alternatives not initially given consideration.
3. Supplementing, improving, or modifying the analysis documented in the EA.
4. Making factual corrections.
5. Explaining why the comments do not need further Forest Service response.

This response document is organized based on the categorization of comments into themes, as described above. Therefore, the Response to Comment Appendix C does not directly match the organization of the EA and is instead more closely tied to the concerns that the public shared during the scoping period with the proposed action. Comments that may have fit into several categories were addressed only once.

It is important to point out that the consideration of public comments is not a vote-counting process in which the project outcome is determined by the majority opinion. Relative depth of feeling and interest among the public can serve to provide a general context for decision-making. More importantly, it is the appropriateness, specificity, and factual accuracy of comment content that serves to provide the basis for modifications to planning documents and decisions. Further, because respondents are self-selected, they do not constitute a random or representative public sample. NEPA encourages all interested parties to submit comments as often as they wish regardless of age, citizenship, or eligibility to vote. Respondents may therefore include businesses, people from other countries, children, and people who submit multiple comments. Every substantive comment and suggestion has value, whether expressed by one respondent or many. All input is read and evaluated, and the analysis team attempts to capture all relevant public concerns in the analysis process.

Response to Comments

Proposed Action

- 1. Possession of alcohol in the area, including the SDRC Trailhead and Saddleback Trailhead leading to CCF, should be permanently prohibited.**

Response: Section 2.1.2 of the EA includes proposals to permanently prohibit the possession of alcohol at CCF, along the SDRG Trail and Eagle Peak Road (Trail), and at the SDRG and Saddleback Trailheads; permanently close the cliff faces surrounding CCF to entry to prohibit jumping into the pool below CCF; designate a visitor use permit area in the immediate vicinity of CCF; and provide a variety of educational materials to visitors. It is anticipated that together these approaches will address challenges observed in the past at CCF more effectively than any single approach.

- 2. Jumping from and climbing the cliffs surrounding CCF should be prohibited. Violators should be cited or arrested.**

Response: See response to comment 1. Additionally, the Forest Service does not have the legal authority to prohibit members of the public from jumping from cliffs, but can close specific areas – such as the tops of cliff areas – to entry.

- 3. The Cleveland National Forest should install a pipe fence around the top of the cliffs to prevent visitors from approaching too close to the cliff edges.**

Response: The proposed action shared during scoping and in the draft EA included the installation of fencing around the top of the cliffs above CCF. Upon further review, it has been determined that fencing in this location may discourage visitors from approaching too close to the cliff edges, though it would not prevent or prohibit them from doing so. In addition to the questionable effectiveness of this fencing, potential impacts to scenery and workplace hazards associated with its installation and maintenance have resulted in this aspect of the proposed action as originally shared being dropped.

- 4. The visitor use permit system will not address all of the ongoing issues associated with CCF.**

Response: See response to comment 1.

- 5. Educational efforts would be more effective in addressing the ongoing issues around CCF than a visitor use permit system.**

Response: See response to comment 1.

- 6. Installing fencing on the cliff faces surrounding CCF may adversely impact the scenery at this site.**

Response: See response to comment 3.

- 7. The proposed action does not consider the difference between “long term” and “short term” visitors and the resulting effects on parking capacity at trailhead facilities.**

Response: It is recognized that use patterns at CCF vary from day to day and throughout the day. Cleveland National Forest Recreation staff observations over the years indicate that on most days there is fairly consistent turnover among visitors and that some visitors stay longer than others. However, neither parking capacity at trailhead facilities nor the distinction between “long term” and “short term” visitors have a role in determining the number of proposed visitor use permits that will be offered to the public each day, and so do not require further analysis. See Section 2.1.2.1 of the EA for information on the adaptive management process that will govern the number of visitor use permits that will be offered to the public each day.

8. The proposed action does not outline enforcement and safety mitigations necessary to maintain the area surrounding CCF.

Response: This comment is not clear in its definition of “maintain the area surrounding CCF.” Nonetheless, the proposed action outlines a number of “safety mitigations.” Additionally, based on past and current experience the Cleveland National Forest can successfully enforce the proposed regulations outlined in Section 2.1.2 of the EA based on its current law enforcement capabilities and consistent with all laws, regulations, and other legal requirements such as the Cleveland National Forest’s Land Management Plan.

9. How will the Forest Service prevent people from jumping off the cliffs into the pool below CCF?

Response: Members of the public will be deterred from jumping off the cliffs into the pool below CCF using a combination of a closure of the cliff areas surrounding CCF, educational outreach, and enforcement of the cliff closure.

10. How will the Forest Service prevent the possession and consumption of alcohol?

Response: The Forest Service is currently and will continue to address alcohol possession and use by members of the public through enforcement of an Alcohol Prohibition (Forest Order 02-12-05, 36 CFR 261.58 [bb]).

11. The Forest Service should not regulate dangerous natural features. The prohibition on alcohol possession will adequately address this challenge. Alternatively, the Forest Service could close the area that leads up to the highest cliffs adjacent to CCF. The smaller cliffs should not be closed to public access and the bolted rock climbing route in the vicinity of CCF should not be closed.

Response: The Forest Service believes that all of the components of the proposed action together will allow it to most effectively manage the challenges outlined in Sections 1.3 and 1.4 of the EA at this time.

12. The Forest Service should address issues pertaining to helicopter rescues with improved signage and educational materials, potable water, the presence of a trailhead host, and a shade structure constructed part way down the trail.

Response: The Forest Service believes at this time that all of the components of the proposed action together will allow it to most effectively manage the challenges outlined in Sections 1.3 and 1.4 of the EA. The addition of potable water and a trailhead host in the future at the SDRG Trailhead will complement the proposed action.

The Forest Service is not currently considering constructing a shade structure along the trail because the topography and vegetation along the trail are such that a structure would be visible from miles away, and

therefore such an action would likely impact the aesthetic qualities of the area within a radius of several miles. Building a shade structure in an area inaccessible by vehicle would also be infeasible to maintain over the long term.

- 13. The proposed metrics to gauge project success are not workable because they are difficult to implement, can be misleading, and can be manipulated. For instance, the metric on social impacts contradicts the goal of increasing public access if resource impacts are low. Other metrics can be distorted by members of the public who seek to decrease public use in this area.**

Response: The metric on social impacts was dropped from the proposed action because issues pertaining to parking on County public roadways are outside the jurisdiction of the Forest Service. For further information see Section 2.1.5 of the EA. Additionally, it should be noted that a variety of environmental and social values are at play at CCF, some of which contradict one another. These contradictions are reflective of the complexity of managing this area. See Section 2.1.2.1 of the EA for an explanation of how the Forest Service will address any potential manipulation of the proposed metrics.

- 14. Conducting the CRAM assessment once per year as proposed will not allow the Forest Service to establish 3-month trends.**

Response: See Section 2.1.2.1 of the EA for an explanation of how monitoring on an annual or bi-annual basis will factor into the adaptive management system.

- 15. A more appropriate way to address littering concerns than the proposed visitor use permit system would be to educate visitors, organize volunteer clean-ups, and enforce existing regulations.**

Response: The proposed visitor use permit system is designed to address a number of concerns, including littering. Beyond the visitor use permit system, the proposed action includes education on Leave No Trace and “pack it in, pack it out” ethics. See Section 2.1.2.1 of the EA for further information. The Forest Service believes that the proposed action in its entirety will allow it to most effectively manage littering and other concerns, and has additionally always encouraged volunteer engagement.

New Alternatives That Should Be Considered

- 16. The Cleveland National Forest should provide potable water and a host at the SDRG Trailhead prior to reopening the area surrounding CCF.**

Response: The SDRG Trailhead does not currently have potable water, which precludes keeping a host on site. The Forest Service is working with local and regional water authorities based on a previous NEPA decision to obtain potable water, and will provide a host when this individual can be provided with water.

Access points to a very small minority of backcountry sites in the National Forest System provide potable water and a host, and National Forests are not required by law or agency policy to provide water and hosts at their recreation sites. So, while the Forest Service is currently working to develop a potable water source and has built a host site at the SDRG Trailhead, these features are not required to open and maintain a trailhead.

- 17. Visitors to CCF should be required at a minimum to bring 100 ounces of water, sunscreen, proper footwear, a map, and a flashlight on their hike.**

Response: The Code of Federal Regulations (CFRs) does not grant the Forest Service the legal authority to require visitors to carry these items with them when they visit National Forest System lands. Existing signage and educational materials provided with visitor use permits will advise hikers of the risks of recreating in this area as well as the means to mitigate those risks.

18. The trails leading to CCF should be open only for day use.

Response: This recommendation was not studied in detail because many of the issues outlined in Sections 1.3 and 1.4 of the EA, which are addressed by the proposed action (Section 2.1.2 of the EA), are related to recreational use that occurs during daylight hours rather than at night. Therefore the Cleveland National Forest is not proposing at this time to close the trails that lead to CCF between sunset and sunrise, which among other recreational groups would unduly impact hunters.

19. Minors under the age of 18 should be prohibited from entering the area surrounding CCF unless there is a minimum of one adult over the age of 30 for every four minors.

Response: The Forest Service is prohibited to discriminate between visitors on the basis of age, race, color, national origin, disability, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or income source, and so cannot impose age restrictions on visitors.

20. Swimming in the pool below CCF should be prohibited.

Response: Visitors swimming in the pool below CCF are not inherently causing any of the issues outlined in Sections 1.3 and 1.4 of the EA and therefore prohibiting swimming at this site would not address the purpose and need of the project. Rather, high levels of visitation and the historic tendency of visitors to jump from the cliffs into this pool contribute to these issues. As such, the Cleveland National Forest is proposing to manage access to CCF and close the cliff faces surrounding CCF to public entry as outlined in Section 2.1.2 of the EA. In an effort to preserve as many recreational opportunities that are not directly related to health and safety or resource concerns as possible, the Cleveland National Forest is not considering closing the pool below CCF to swimming at this time.

21. Hikers seeking to access the San Diego River Gorge should be evaluated on the basis of their physical condition. Visitors not meeting a minimum standard should not be allowed to access the project area.

Response: The Forest Service is prohibited to discriminate between visitors on the basis of ability, race, color, national origin, disability, age, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or income source, and so cannot impose visitor restrictions based on fitness.

22. The SDRG Trailhead should be permanently closed and reserved only for emergency use.

Response: Closing the SDRG Trailhead or obliterating the SDRG Trail would be in direct contradiction with Cleveland National Forest Land Management Plan (2005). See Section 1.4 of the EA for relevant guidance from the Land Management Plan.

23. Obliterating the SDRG Trail is preferable to implementing a visitor use permit system because visitation levels did not pose problems prior to the construction of the trail.

Response: See response to comment 22. Additionally, the SDRG Trail and Trailhead were developed in part to address the resource impacts resulting from decades of use on unofficial trails leading to the highly popular CCF. Obliterating the trail would not prevent development of user-created trails to access the gorge, so would not meet the purpose and need of this project to reduce resource impacts or prevent undesirable visitor behavior.

24. Permit requirements generally reduce access to public lands for recreational purposes, though CCF presents many management challenges. The best approach would be to obliterate the trail, though if this is not possible a visitor use permit may help to minimize past management issues.

Response: See response to comment 22.

25. Vegetation should be restored on the hillsides surrounding CCF to discourage visitors from scrambling to the top of the cliffs surrounding CCF.

Response: The Cleveland National Forest believes that a more effective way to prevent recreationists from scrambling to the top of the cliffs surrounding CCF is to close these areas to public entry. Without closures in place efforts to restore vegetation would be hampered by continued recreation pressure, and it is hoped that the closures will allow the vegetation to naturally return to these sites.

26. The CCF area should be turned over to the National Park Service to be effectively managed.

Response: This comment does not define “effective management” nor does the Forest Service agree that its management is not effective. Further, this comment is outside the scope of this project.

27. The Cleveland National Forest should implement a policy that requires visitors to carry their human waste out of the San Diego River Gorge.

Response: The Cleveland National Forest does not currently have water quality or other data or observations that suggest that human waste is an issue in the San Diego River Gorge. However, the litter metric outlined in Section 2.1.2.1 of the EA addresses human waste in addition to litter and other hazardous materials. If human waste becomes a problem in the future the Cleveland National Forest will take steps to address this issue by reducing the number of visitor use permits granted in accordance with the proposed adaptive management system. Adaptive management steps to address other potential environmental impacts are presented in Section 2.1.2.1 of the EA.

28. The SDRG Trail and Trailhead should remain closed for an additional year to allow for a decrease in public interest in these sites.

Response: The Forest Service will re-open the SDRG Trail and Trailhead when it is determined that recreational use at this site can be managed according to standards in the Cleveland National Forest Land Management Plan. See Section 1.4 of the EA for relevant Land Management Plan direction. Additionally, access to CCF has already been restored from the Saddleback Trailhead, and so the continued closure of the SDRG Trail and Trailhead may not lead to a decrease in public interest in this highly popular site.

29. The Forest Service should de-emphasize CCF to discourage use of this area by removing the large interpretive signs located at the trailheads.

Response: The signs at the trailheads that lead to CCF are primarily focused on regulatory and warning information at this time, and so it is unlikely that these signs are encouraging greater use of this area. Interpretive signs may be installed in the future in an effort to continue to educate the public about potential safety concerns and responsible recreation techniques, though it is expected that CCF rather than trailhead signage will continue to be the primary interest of visitors.

Environmental Analysis and Consequences

Depth of Analysis

- 30. The Forest Service should prepare an EIS for this project because the draft EA does not adequately address public safety issues, traffic impacts, and environmental impacts in the project area.**

Response: The proposed action directly addresses historic and ongoing public safety issues and environmental impacts in the project area, and indirectly addresses traffic congestion adjacent to the project area by managing public use at CCF and tying future use levels at CCF to a baseline condition defined by the metrics presented in Section 2.1.2.1 of the EA. The project will not result in new impacts nor will it lead to an increase in historic levels of impact. Therefore, no significant impacts exist, so an EIS need not be completed for this project.

- 31. Section 1.7 of the draft EA states, “No significant issues were identified by the interdisciplinary team or during scoping.” This statement is incorrect. There are obvious, significant impacts to County roadways and resources related to SDCE that have not been fully evaluated or mitigated by the proposed action.**

Response: The Forest Service determines “significance” as defined by NEPA. No significant impacts would result from the proposed action. See the Finding of No Significant Impact (FONSI). See also response to comment 30.

- 32. Response to comment 109 in the draft EA (response to comment 172 in the EA) indicates that the Forest Service was aware that visitor patterns at CCF had been increasing for a number of years prior to the development of the SDRG Trailhead. Based on this recognition and recent documented issues, the Forest Service must identify impacts and analyze mitigation for the impacts to the human environment in SDCE and surrounding County roadways caused by building a trailhead that is unable to accommodate projected visitors.**

Response: The Forest Service is not required under NEPA to revisit or analyze past decisions. However, response to comment 30 describes how the proposed action will address issues associated with increasing patterns of public use at CCF that have occurred since 2007.

- 33. Section 3.3 of the draft EA does not mention project impacts to County of San Diego infrastructure and/or resources, financial or otherwise. An EIS should be prepared to evaluate impacts to the adjacent County jurisdiction, including roadways and impacts to residents.**

Response: See response to comment 30.

Soils

34. The project should be designed to minimize the potential for soil erosion related to construction during and after construction of the trail and parking area.

Response: After discovering unanticipated wildlife and cultural resource issues the Cleveland National Forest elected to modify the proposed action and drop the proposal to construct a trail and parking area at the Saddleback Trailhead. See Section 2.1.5 of the EA for additional information. Regardless, it should also be mentioned that the Forest Service uses “Best Management Practices” in all of its construction projects to minimize the potential for soil erosion and other issues.

Physical Environment

35. The proposed action does not address how up to 375 recreationists per day would impact the area surrounding CCF.

Response: The proposed action outlines a baseline condition based on “thresholds” for both existing concerns and potential future resource concerns as outlined in Section 2.1.2.1 of the EA. The intent is to allow the maximum amount of recreational access possible while remaining consistent with the baseline condition in order to achieve a balance between public use at this popular recreation destination and resource conditions. Thus, if any of the thresholds were exceeded the number of visitor use permits issued per day, and thus the maximum number of recreationists allowed to access CCF, would be decreased. Defining a baseline condition and the mechanisms by which to attain it allows for a more accurate understanding of future resource conditions than evaluating the impacts associated with a specific level of visitation, as different visitors vary in the level of their respect for the land and experience with low-impact recreation techniques. The figure of 375 recreationists represents an initial approximation of the number of visitors the area can sustain without further environmental degradation on a daily basis. This figure is based on past experience of Forest Service personnel, estimates of average group size, and parking turnover. However, monitoring will allow for adjustments to the use level at CCF per Section 2.1.2.1 of the EA in order to maintain baseline resource conditions.

36. The proposed action, which would allow 75 visitor use permits and up to 375 hikers per day access CCF, is environmentally unsound. An environmental analysis, coupled with facility limitations, should provide the basis on the number of visitor use permits issued each day.

Response: The commenter does not provide any documented evidence to support this comment. The Forest Service is unaware of any environmental analysis beyond that already disclosed that will reveal information more accurate than the outcome from monitoring under the adaptive management system as proposed in Section 2.1.2.1 of the EA. See Sections 3.1 through 3.3 for the Cleveland National Forest’s analysis of the environmental and social consequences associated with the alternatives presented in the EA.

37. There is no toilet facility in the area around CCF. The proposed action does not address potential issues of human waste nor does it provide mitigation of potential environmental impacts in the project area.

Response: See response to comment 27.

38. A port-a-potty should be installed in the vicinity of CCF to address potential issues of human waste.

Response: See response to comment 27. Further, vehicular access to the San Diego River Gorge is not adequate to allow the placement and maintenance of a port-a-potty in the vicinity of CCF. Restroom facilities are provided at the SDRG Trailhead.

Biological Environment

39. Based on the intent of the project to manage use, the project may indirectly result in increased use of unofficial trails or creation of illegal trails. The EA should evaluate the potential for direct or indirect effects to biological and cultural resources from increased unofficial or illegal trail use.

Response: Use will only be managed within the immediate vicinity of CCF and it is therefore anticipated that the project will result in an overall reduction in the proliferation of user-created trails. Further, the adaptive management system as outlined in Section 2.1.2.1 of the EA is designed such that user created trails will remain stable or decrease as compared to 2012 conditions.

Cleveland National Forest Law Enforcement Officers and Forest Protection Officers will enforce the proposed use restrictions regardless of the route by which visitors attempt to access the proposed visitor use permit area outlined in Section 2.1.2 of the EA. The Cleveland National Forest is also unaware of any correlation between the management of visitor use and the use or creation of unofficial trails. Furthermore, unless otherwise posted, National Forest System lands are open to public access regardless of the presence of a trail.

Additionally, attempting to identify and quantify the future use and proliferation of unofficial trails or the creation of illegal trails would be highly speculative. As mentioned in the EA, the proposed action contains a monitoring metric related to the proliferation of unofficial trails in the visitor use permit area. If such degradation of the natural resource base is detected, visitor use levels will be managed accordingly.

40. Biological surveys, especially for California gnatcatcher, burrowing owl, and raptors should be considered for any trail construction or design.

Response: After discovering unanticipated wildlife and cultural resource issues the Cleveland National Forest elected to modify the proposed action and drop the proposal to construct a trail and parking area at the Saddleback Trailhead. As such, no trail construction will occur as a part of this project. See Section 2.1.5 of the EA for additional information. Further, it should be mentioned that all Forest Service projects require the completion of a biological evaluation and assessment, which analyzes potential impacts to these and other endangered, threatened, and sensitive plant and animal species.

41. Project impacts that could have potentially adverse effects to the unincorporated County or County facilities should evaluate and mitigate environmental impacts using the County of San Diego's Guidelines for Determining Significance.

Response: The County's guidelines for determining significance are based on requirements of the California Environmental Quality Act (CEQA). This project is not subject to CEQA because the proposed action lies entirely on National Forest System lands. As such, this project is subject to the National

Environmental Policy Act (NEPA) and the significance criteria found in the regulations for implementing NEPA at 40 CFR 1508.27.

Social Environment

42. The EA should properly analyze the archaeological and historic significance of the area and the potential effects from the proposed action to cultural resources.

Response: See Section 3.3.3 of the EA.

43. It is not clear how the project proposes to relieve impacts to the San Diego Country Estates (SDCE) neighborhood adjacent to the SDRG Trailhead. Please further describe ongoing problems occurring in SDCE and how the proposed project would improve the situation.

Response: See Section 1.3 of the EA for a description of ongoing issues that are occurring in SDCE. Given that these issues are related primarily to traffic congestion and parking in the neighborhood adjacent to the SDRG Trailhead, the Forest Service assumes that managing use at CCF via the proposed visitor use permit system outlined in Section 2.1.2 of the EA will in turn reduce impacts such as consistently high levels of overflow parking in the neighborhood adjacent to the trailhead. It is important to point out that the Forest Service cannot prohibit or control parking on County (public) roadways. Only the County has the authority to directly manage parking on County-maintained roads.

44. The EA should analyze the potential visual and aesthetic resource impacts of the proposed action.

Response: See Section 3.3.2 of the EA.

45. Visitation for public viewing of Mildred Falls should be considered in planning for this project.

Response: This comment is outside the scope of this project.

46. The EA should include a traffic assessment to determine the project's potential effect on circulation and County-maintained roads in the vicinity of the project area.

Response: According to the "County of San Diego Guidelines for Determining Significance and Report Format and Content Requirement: Transportation and Traffic," traffic impact studies may apply to specific land development or road improvement projects (3), pursuant to the California Environmental Quality Act (CEQA) (i).¹³ CEQA applies to certain activities of state and local public agencies.¹⁴ No infrastructure construction or land development will occur as part of this project, and the Forest Service is a federal, not state, agency. As such, the Cleveland National Forest is not obligated to conduct a traffic assessment as part of this project.

Regardless, based on the initial proposal to issue 75 visitor use permits per day, no more than 75 vehicles total will initially be authorized to utilize the trailheads that lead to CCF for the purposes of visiting CCF. Based on estimates of use patterns presented in Section 1.3 of the EA, approximately 71 to 79% of traffic

¹³ The document "County of San Diego Guidelines for Determining Significance and Report Format and Content Requirement: Transportation and Traffic" can be accessed at http://www.sdcounty.ca.gov/dplu/docs/Traffic_Guidelines.pdf.

¹⁴ This information was accessed on the CEQA Frequently Asked Questions website, at <http://www.ceres.ca.gov/ceqa/more/faq.html>.

associated with visitation to CCF utilizes the SDRG Trailhead, whereas the remaining 21 to 29% of traffic is via the Saddleback Trailhead. The initial figure of 75 visitor use permits issued per day therefore suggests that approximately 16 to 22 vehicles (or 32 to 44 average daily trips) would seek access to CCF via the Saddleback Trailhead, and 53 to 59 vehicles (or 106 to 118 average daily trips) would seek to access CCF via the SDRG Trail. These estimates are based on the Forest Service assumption that each group that has obtained a visitor use permit will travel to the trailhead in one vehicle. Additionally, based on Forest Service staff observations over time, average use patterns at CCF are such that visitors come and go throughout the day, and not all visitors necessarily drive to the trailheads. If we assume that this use is spread primarily over 8 hours, the average number hourly trips throughout the busy part of the day at the SDRG Trailhead, where most use occurs, is 14.75. Other traffic to this area would not be associated with this project, so according to the "County Criteria for the Need to Prepare a Traffic Impact Study (TIS)," no additional traffic analysis would be required because hourly trips are fewer than 20.

It should be emphasized that this analysis of traffic patterns was completed as a courtesy to the County and is intended for informational purposes only, as the Cleveland National Forest is not obligated to conduct a traffic assessment as described above.

47. Any requirement by the County to conduct a Traffic Impact Study is not justification to reduce visitation to this site. Further, in 2010 and 2011 hundreds of vehicles visited this area on a typical busy day.

Response: See response to comment 46 for an explanation as to why the Forest Service is not required to conduct a Traffic Impact Study as part of this project. See Sections 1.3 and 1.4 of the EA for rationale as to why the Forest Service is proposing to manage use at this site.

48. The proposed visitor use permit system discriminates against minors and others who do not have a credit card because NRRS requires a credit card to make a reservation.

Response: Visitor use permits are required at a variety of Forest Service sites across the National Forest System. Forest Service policy directs all National Forest System units to use NRRS for all reservable recreation opportunities (FSM 2334.35). Further, NRRS allows individuals to make reservations with credit cards, debit cards, or prepaid cards, such as those offered by Visa and Mastercard. Individuals of any age who are not able to obtain a credit card could use a debit or prepaid card to reserve a visitor use permit.

Funding and Forest Service Staffing

49. There is enough demand for recreation at CCF that the Cleveland National Forest should have money available to hire permanent staff for this area.

Response: Despite an ongoing need for management in the area surrounding CCF, funding for Forest Service recreation programs is not directly tied to recreation demand.

50. The Forest Service must ensure that no County resources will be necessary for safe operation of this area.

Response: County law enforcement and emergency services staffs have responded to incidents in the CCF area in the past and have the discretion to do so at times in the future because in many cases these incidents are under the jurisdictional authority of the County. San Diego County has authorized the Sheriff's Department to perform search and rescue and emergency response operations across the County.

51. The draft EA does not identify impacts to the County if CCF is designated as a visitor use permit area. The action will compel the County to provide unbudgeted public services including enforcement, rescue services, parking mitigation, and mitigation for quality of life issues.

Response: See response to comment 50. Further, the proposed action does not compel the County of San Diego to take any action.

52. Local law enforcement and fire departments are frequently diverted from their normal duties to responds to emergency calls in the project area.

Response: The emergency calls in the project area that local law enforcement and fire departments respond to fall under the jurisdictional authority of the responding agencies. These incidents could therefore be considered “normal duties” associated with any area of high public use within San Diego County for these respective departments.

Enforcement

53. The Cleveland National Forest does not have adequate enforcement personnel to ensure that the project is successful.

Response: This comment does not define “success.” Further, rules and regulations that result from the proposed action would be enforced by both law enforcement officers and forest protection officers. The Cleveland National Forest’s law enforcement resources are comparable to or greater than those of national forests across the nation, and we will use a targeted approach to law enforcement (focusing available law enforcement resources at CCF during busy periods) rather than having officers on site at all times. To date this strategy has been effective in managing the temporary closure order put into place around CCF in July, 2011, as well as in other locations. The Forest Service is confident that this approach will continue to be successful in the future based on past experience, including at this site. Further, educational materials will be included with the visitor use permit, which will better inform visitors about the regulations and appropriate behaviors in this area. Improved education is expected to decrease the need for law enforcement over time as visitors become more familiar with area regulations.

54. If Forest Service budgets are being cut and no money is available for increased management and enforcement in the area surrounding CCF, CCF should remain closed.

Response: The Forest Service is not proposing to obtain increased enforcement resources as part of this project. See response to comment 53 for additional discussion of the Forest Service approach to law enforcement as it pertains to this project. Further, leaving CCF closed requires management of the closure. Managing a closure requires staffing in line with or greater than managing the proposed visitor use permit system.

55. It is erroneous for the draft EA to state support for a “targeted” approach to enforcement (focusing available law enforcement resources at CCF during busy periods) by using the temporary July 2011 closure as an example. Enforcement of a closure is significantly different than enforcing an active trail site. It is the [County’s] understanding that there is an extremely limited number of USFS staff available for enforcement, so proper enforcement will not be possible.

Response: The commenter does not describe their definition of “proper” enforcement. Nonetheless, see response to comment 53 for an explanation of the standard Forest Service approach to law enforcement, which currently applies to CCF. This approach has applied to CCF in the past and will continue to do so in the future.

Additionally, aside from the proposed alcohol prohibition on the SDRG Trail and Eagle Peak Road (Trail), enforcement needs on these trails (an “active trail site” according to the commenter) will be comparable to other Forest Service trails. Further, the area closures that have been in place across the project area in recent months are much more challenging to enforce than the proposed visitor use permit area would be due to the large area that the closures cover. See Section 2.1.2 and Figure 2 in the EA for an overview of the proposed visitor use permit area, which will be much smaller in size than the closure areas. Other enforcement will occur at times at the trailheads that lead to CCF, which are discrete points on the landscape, and so will also allow for efficient, effective law enforcement operations.

56. Enforcement of a visitor use permit area, alcohol prohibition, and campfire prohibition requires that law enforcement officers be posted at CCF 24 hours per day, 7 days per week.

Response: See response to comment 53. Additionally, no law enforcement agency can monitor all areas or issues at all times.

57. On weekends and during the summer months a minimum of six law enforcement officers should be posted at CCF and the trailheads that lead to CCF. On weekdays at least four law enforcement officers should be posted at CCF and trailheads.

Response: See response to comment 53 for a brief overview of typical Forest Service law enforcement staffing. Further, the commenter does not provide justification as to why the suggested staffing levels should be implemented and does not take into consideration other pressures and constantly shifting law enforcement needs and priorities.

58. Without adequate enforcement no management system will address the ongoing issues associated with CCF.

Response: The Forest Service believes that its enforcement resources are sufficient for the successful future management of CCF in accordance with the proposed action. Further, the adaptive management strategy provides for managing visitor numbers if specified resource impacts exceed the proposed metrics.

59. The draft EA notes that a targeted approach to enforcement will be used at CCF. This will not be effective, as hikers without visitor use permits will visit CCF when they realize that law enforcement officers are not present.

Response: See response to comment 53.

60. The fine for breaking new rules in the project area should be increased.

Response: This comment is outside the scope of this project because the Forest Service does not establish the financial penalties associated with violating various laws. The fines for violating various laws and regulations proposed as part of this project are set by the District Attorney’s Office of the Department of Justice.

61. It is difficult for law enforcement and emergency response organizations to quickly respond to issues at and around CCF due its remote location.

Response: The Cleveland National Forest recognizes that the remote location of CCF presents challenges for law enforcement and emergency response operations. As such, the forest is looking for ways to improve the accessibility of the area. In the interim, targeted law enforcement operations are at times being staged in the area surrounding CCF so that law enforcement officers and forest protection officers are already on scene during busy periods of visitation when many enforcement or emergency response needs arise.

62. Law enforcement officers should take a “zero tolerance” approach to violations or illegal activity during the initial implementation of the project. A public education program should be simultaneously implemented to ensure that visitors are aware of new regulations.

Response: The Forest Service anticipates focusing its enforcement resources on CCF when the SDRG Trail is reopened and in the future during busy periods in an effort to effectively educate the public and address potential law enforcement issues in the project area. This being said, law enforcement personnel are trained to assess a given situation and tailor their response to violations of the law or regulations based on the severity of the action in question, their sense of safety, and whether or not an opportunity exists to educate the individual in question. Public education will be used to ensure that visitors are aware of new regulations.

63. The Cleveland National Forest should enforce regulations and issue citations for all infractions. Rather than issuing warnings, the maximum penalty possible, including arrest, should be imposed on members of the public violating the law or regulations.

Response: See response to comment 62.

64. CCF presents challenges law enforcement officer safety when only one or two officers engage in enforcement activities at CCF.

Response: Forest Service law enforcement officers are trained to work alone or in small groups in remote areas, and this is a common, accepted part of their jobs. Potential safety concerns are addressed in part by the training and tools provided to law enforcement personnel.

65. A strong enforcement presence when the SDRG Trail is reopened will be beneficial in educating the public about area regulations and minimizing future problems.

Response: See response to comment 62.

66. CCF should remain closed until an enforcement plan is mutually agreed upon by the San Diego Sheriff’s Department, California Highway Patrol, Cal Fire, and the Cleveland National Forest.

Response: The Cleveland National Forest is engaged in ongoing coordination meetings with the San Diego Sheriff’s Department and Cal Fire regarding the management of CCF, and looks forward to continued cooperation with its partners in matters of law enforcement. These meetings focus on clarifying jurisdictional authorities and the commitment of resources and personnel to CCF based on current priorities and capabilities.

67. It is arbitrary and capricious to reach the conclusion that the proposed action will not result in significant impacts in the absence of an enforcement plan. An enforcement plan should identify staffing, locations, and hours of enforcement.

Response: See comment 53 for an overview of the approach that the Forest Service takes to law enforcement. This approach will also apply to CCF and is standard across the agency. The Cleveland National Forest has law enforcement resources that are comparable to or greater than those of other national forests.

The baseline condition in the project area is represented by historic conditions and public use patterns at CCF, which are described in Section 1.3 of the EA. A complete lack of enforcement of the visitor use permit system would likely result in a return to the baseline condition, which would result in the status quo rather than impacts, significant or not, as defined under NEPA. Finally, by publically publishing its enforcement plans the Cleveland National Forest would likely compromise the effectiveness of its law enforcement operations, increasing the likelihood of a return to the challenges outlined in Section 1.3 of the EA.

See response to comment 30 for additional discussion of why the proposed action will not result in significant, adverse impacts.

68. The Cleveland National Forest should reimburse the San Diego Sheriff's Department to cover the cost of all overtime incurred enforcing the closure order put into place in July, 2011.

Response: Absent an agreement by the Forest Service to reimburse the County for costs associated with enforcement of the closure order put into place in July, 2011, the Cleveland National Forest is unaware of any legal basis for the County to hold the Forest Service liable for these costs. This is in large part due to the fact that it is the jurisdictional responsibility of the County to perform search and rescue operations, as well as provide law enforcement in unincorporated areas of the County, such as in SDCE.

69. The Cleveland National Forest should approach the San Diego River Conservancy about the River Conservancy's willingness to reimburse the San Diego Sheriff's Department and California Highway Patrol for personnel who work at CCF.

Response: See response to comment 68.

70. Vehicles parked at the trailhead should be subject to inspection of all contents and compartments without a warrant by law enforcement personnel.

Response: The Code of Federal Regulations (CFRs) does not grant the Forest Service the authority to search and inspect visitors' vehicles without a warrant. Furthermore, the Fourth Amendment to the Constitution of the United States guards against unreasonable searches and seizures, including of vehicles, without probable cause or reasonable suspicion of criminal activity. This suggestion is additionally outside the scope of this project.

71. The San Diego Sheriff's Department and California Highway Patrol should be granted the authority to engage in enforcement activities on the Cleveland National Forest.

Response: County and State law enforcement officers have the jurisdiction to enforce many laws on National Forest System lands. However, it would require an Act of Congress to allow the Forest Service to grant local and state law enforcement officers with CFR enforcement authorities, which allow for the proposed visitor use permit area, alcohol prohibition, and cliff closure.

72. To date, current enforcement efforts have been focused at the trailheads leading to the San Diego River Gorge.

Response: This comment is a matter of opinion and is speculative in nature. The Cleveland National Forest has enforced area regulations both at the trailheads leading to the San Diego River Gorge and in the immediate vicinity of CCF, where people are most likely to congregate or be intercepted by Forest Service law enforcement personnel.

73. The \$6 administrative fee associated with the visitor use permit should be used to fund enforcement activities in the project area.

Response: The National Recreation Reservation Service (NRRS) fee associated with the visitor use permit system is collected by NRRS to cover the administrative costs associated with running the reservation system. The NRRS fee is distinct from a Forest Service Standard Amenity Fee, and no part of the NRRS fee is retained by the Cleveland National Forest, and as such cannot be used to fund enforcement activities in the area surrounding CCF.

Standard Amenity Fees can be charged only at developed recreation sites that contain picnic tables, trash collection, toilet facilities, parking, interpretive signing, and security. While the San Diego River Gorge contains all of these required amenities, requiring a fee at this trailhead would therefore provide a financial incentive for forest visitors to park on County roads rather than in the trailhead parking lot because the Forest Service does not have the authority to levy parking fees on County roads.

74. Remote surveillance cameras should be installed at the trailheads leading to CCF to enhance law enforcement capabilities.

Response: The Cleveland National Forest is not currently considering installing remote surveillance cameras at its trailheads because it is unclear how this approach would improve enforcement outcomes for the proposed visitor use permit area, alcohol prohibition, and closure of cliff faces. Of particular importance here is that violations of the proposed visitor use permit area and closure of cliff faces occur in the immediate vicinity of CCF, not at the trailheads. The open possession and consumption of alcohol occurs at CCF and along the trails the vast majority of the time as well, not at the trailheads.

Public Health and Safety

75. The Cleveland National Forest should not close the cliffs surrounding CCF because the Forest Service is under no legal obligation to prevent the public from experiencing the natural hazards associated with cliffs, climbing, rappelling, or jumping into pools of water.

Response: The Cleveland National Forest is not proposing to close the cliffs surrounding CCF because it is under a legal obligation to do so. Rather, this action is being proposed to improve public health and safety as well as address an ongoing and consistent pattern of injuries and fatalities associated with risky behaviors at this site.

76. The public should not be prohibited from jumping from the rocks on the northwest side of the pool below CCF. These rocks range from 2 to 10 feet in height and provide an opportunity for people to learn to jump from progressively higher heights.

Response: The Forest Service believes that it is necessary to close all cliffs and rocks adjacent to CCF to public entry and jumping in order to address an ongoing and consistent pattern of injuries and fatalities associated with risky behaviors at this site. For one, the depth of the water in the pool below CCF is variable, and at times poor visibility obscures potential hazards below the water's surface. Second, to close some but not all cliff areas to public entry may create confusion for the public and enforcement challenges, which together could result in recreationists unknowingly engaging in unsafe and prohibited activities at this site.

77. Children and young adults are attracted to CCF to jump into the pool below CCF, an activity that is inherently dangerous.

Response: The Cleveland National Forest does not disagree that some individuals may seek to visit CCF to jump from rocks into the pool below CCF and that this activity in many instances is dangerous. However, public lands, which make up approximately one-third of the United States, have many dangers associated with their features and the activities that visitors choose to undertake. There are over twenty waterfalls on this District alone. The visitor is ultimately responsible for her/his personal safety and wellbeing when using these lands.

78. The Cleveland National Forest should remove rocks at the downstream end of the pool below CCF to eliminate the pool and the safety issues associated with visitors jumping from the rocks surrounding CCF.

Response: The Cleveland National Forest believes that the proposed action will allow it to successfully manage the issues described in Section 1.3 of the EA. Further, to permanently drain the pool below CCF would likely adversely impact a number of forest resources, and so may ultimately not be an environmentally feasible management approach nor would it be consistent with the Land Management Plan.

79. A lifeguard should be posted at CCF during daylight hours on weekends and holidays.

Response: The Forest Service does not traditionally staff its undeveloped swimming areas with lifeguards, nor does it have the resources to do so. Additionally, as described in response to comment 77, public lands make up one-third of the United States. These lands are largely undeveloped and are not managed like a city or county park.

80. A new trailhead at the end of Ramona Oaks Road would address safety concerns at CCF because it is 100 feet lower than the SDRG Trailhead, and would therefore result in fewer visitors experiencing heat exhaustion. Existing shade trees in the vicinity of Ramona Oaks Road will further address the issue of heat related illness.

Response: Most cases of observed heat exhaustion on the SDRG Trail occur on the trail rather than at the trailhead, so it is doubtful that new parking facilities located 100 feet lower in elevation than the present facilities would substantially reduce instances of visitors experiencing heat exhaustion along the trail. The SDRG Trailhead also contains a shade structure.

See Section 2.1.6 of the EA for additional discussion of the issues pertaining to the construction of an alternate trailhead location at the end of Ramona Oaks Road.

81. Access to CCF should be prohibited during periods of high fire danger.

Response: This comment is outside the scope of this project. However, the Cleveland National Forest has in the past implemented emergency area closures during periods of extreme fire danger and may elect to do so again in the future.

82. The trailheads that lead to the San Diego River Gorge should be closed during periods of extremely hot weather.

Response: The Cleveland National Forest is not currently considering implementing area closures in the area surrounding CCF due to hot weather conditions because as a rule the Forest Service seeks to provide as much public access to public lands as possible. Further, it is ultimately the responsibility of forest visitors, not the Forest Service, to ensure that they are prepared for extreme weather conditions.

83. A permanent helipad should be constructed near CCF to improve emergency response and enforcement capabilities.

Response: A permanent helipad was designated in the vicinity of CCF in early 2011 in coordination with the San Diego Sheriff's Department.

84. The Cleveland National Forest should patrol the trails leading to the San Diego River Gorge using a motorized four-wheeler in order to allow for the delivery of fluids as well as to improve rescue transport of distressed hikers.

Response: The landscape surrounding the SDRG Trail is classified as "Semi-Primitive, Non-Motorized," meaning that the use of motorized equipment is inconsistent with the Cleveland National Forest Land Management Plan. Eagle Peak Road (Trail) is not safely passable for a motorized vehicle at this time.

85. The response to comment 84 (response to comment 58 in the draft EA) notes that ATV use on the SDRG Trail is inconsistent with management classification of this area as Semi-Primitive, Non-Motorized. This results in helicopter rescue operations. Aren't helicopters motorized?

Response: Occasional aircraft access is generally acceptable in lands classified by the Forest Service as Semi-Primitive, Non-Motorized, particularly for emergency search and rescue operations. In addition to their consistency with this land management classification, helicopter operations are generally less obtrusive and far more effective for rescue operations than ATVs in unroaded, remote terrain.

86. The draft EA describes existing problems of restricted emergency access along Eagle Peak Road during busy periods at CCF. Does the Forest Service propose to use signage, increased patrols, or other measures to address this issue?

Response: The Forest Service assumes that the management of public use at CCF will in turn improve past problems related to traffic congestion on Eagle Peak Road. Additionally, Eagle Peak Road is a County-maintained road. The Forest Service therefore does not have the authority to impose or enforce parking restrictions, or otherwise manage traffic unless vehicles are parked in such a manner that they are blocking the right of way. In such cases Forest Service law enforcement officers can and do issue parking citations. The Forest Service has relayed concerns regarding this issue to the California Highway Patrol and San Diego Sheriff's Department, and is currently working with the Sheriff's Department and Cal Fire to address a number of issues at Cedar Creek Falls.

87. The draft EA identifies an existing problem with parking at the Saddleback Trailhead, thus making it unsafe for vehicles to pass and rendering the road inaccessible for emergency vehicles. The EA does not describe whether parking will be prohibited or restricted on this road. If parking will not be restricted, the impacts to public safety from the inability of emergency vehicles being able to access this area should be discussed, analyzed, and mitigated.

Response: See response to comment 86.

Search and Rescue

88. People who are rescued or evacuated from the area surrounding CCF should be fined and/or pay the costs of the rescue operation.

Response: This comment is outside the scope of this project because search and rescue operations are outside the jurisdictional authority of the Forest Service. Rather, the County of San Diego has authorized the Sheriff's Department to perform such search and rescue operations. Any changes to this policy would have to be brought about by the County.

89. The San Diego Sheriff's Department should be granted with vehicle access along the SDRG Trail.

Response: See response to comment 84.

Volunteers

90. The Cleveland National Forest should develop a volunteer patrol program in the project area.

Response: The Cleveland National Forest currently has a volunteer safety patrol program in place on many busy days in the area surrounding CCF. This program focuses on educating visitors about weather conditions, hazards, and the difficulty of the hike to and from CCF; assisting members of the public who are near or in distress; and helping to coordinate rescue operations as necessary.

91. Volunteers do not have enforcement capabilities, and so the use of volunteers to address safety and resource concerns in the project area does not adequately address the concerns outlined in Sections 1.3 and 1.4 of the EA.

Response: Forest Service volunteers are prohibited from engaging in law enforcement activities, which includes making contact with visitors observed breaking forest rules or violating the law. Rather, in these instances volunteers are instructed to notify law enforcement. See response to comment 90 for an example of volunteer actions that are appropriate and that address some of the concerns outlined in Sections 1.3 and 1.4 of the EA.

92. A host at the SDRG Trailhead would not be able to enforce rules and regulations in the area surrounding CCF.

Response: See response to comment 91.

Infrastructure Improvements

93. The Cleveland National Forest should work with the San Diego River Park Foundation to explore trail connections between Eagle Peak Preserve and the trail that continues to the San Diego River Gorge, as well as improvements such as an emergency helicopter landing site, potable water facility, a pump-out comfort station, and interpretive elements for Eagle Peak Preserve.

Response: This comment is outside the scope of this project because it does not meet the purpose and need outlined in Section 1.4 of the EA.

94. The EA should include figures and graphics that clearly portray the location of existing and proposed improvements, as well as local roadways.

Response: See Figures 1, 2, 3, and 4 of the EA.

95. Will the proposed project result in the need for additional infrastructure and/or utilities?

Response: Aside from signage in the project area the proposed action does not include the development of any infrastructure or utilities. For further information see Section 2.1.2 of the EA.

96. A permanent kiosk and dumpster should be located in the vicinity of CCF.

Response: The Cleveland National Forest installed what it believes to be adequate signage in the vicinity of CCF during spring and summer of 2011. Vehicular access to the San Diego River Gorge is not adequate to allow the placement of a dumpster in the vicinity of CCF nor should the taxpayer bear the financial burden of removing trash from this site for the convenience of hikers when visitors can otherwise carry out the limited quantity of trash that would be on their person.

Noise

97. The EA should analyze the potential impacts of noise from construction activity on sensitive species.

Response: No construction activities outside of the installation of signage in the project area will occur as part of this project. For further information see Sections 2.1.2 and 2.1.5 of the EA.

Campfires

98. A prohibition should be placed on fires and smoking in the project area.

Response: This comment is outside the scope of this project. Campfires outside of the fire rings in developed campgrounds are prohibited at all times across the Cleveland National Forest, including in the San Diego River Gorge. At this time the Cleveland National Forest has not identified a need to prohibit smoking in its dispersed areas except for during extreme fire conditions.

99. Issues related to campfires and overnight camping in the area surrounding CCF should be addressed.

Response: See response to comment 98 for a discussion of campfires. Illegal campfires are addressed using law enforcement actions. Overnight camping is prohibited within 200 feet of water and trails, and targeted

enforcement actions occur to address this issue. While these regulations would in effect prohibit camping at CCF and in the proposed visitor use permit area, it is important to point out that camping is allowed in other parts of the San Diego River Gorge and Cedar Creek drainage.

Dogs

- 100. It should be required that dogs remain on a leash at all times in the area surrounding CCF.**

Response: Dogs must be under the control of their at all times on National Forest System lands. According to 36 CFR § 261.8 (d), visitors are prohibited from “possessing a dog not on a leash or otherwise confined.”

- 101. People should be prohibited from bringing dogs to CCF.**

Response: The Code of Federal Regulations (CFRs) does not grant the Forest Service the authority to prohibit visitors from bringing dogs with them when they visit National Forest System lands.

- 102. Dogs of primarily the pit bull breed should be prohibited in the area surrounding CCF.**

Response: The Code of Federal Regulations (CFRs) does not grant the Forest Service the authority to prohibit visitors from bringing specific breeds of dog with them when they visit National Forest System lands.

Education

- 103. The Forest Service should install informational signage along Eagle Peak Road so that unformed visitors who seek to visit CCF but do not have a visitor use permit do not unnecessarily travel all the way to the Saddleback Trailhead.**

Response: The Cleveland National Forest proposes to take a number of approaches to educating visitors about safe hiking practices and methods of minimizing resource impacts. See Section 2.1.2 of the EA for further information.

- 104. Signs that educate the public about the visitor use permit system should be placed at the trailheads leading to CCF.**

Response: See response to comment 103.

- 105. The Cleveland National Forest should install signage at the junction of Eagle Peak and Boulder Creek Roads that outlines the need to carry water on the hike to the San Diego River Gorge.**

Response: See response to comment 103

- 106. The Cleveland National Forest should provide information on the “ten essentials” to visitors.**

Response: See response to comment 103.

107. Current signage at and around CCF is inadequate. Signage should be larger and more conspicuous.

Response: The Forest Service seeks to strike a balance between providing adequate information to visitors and maintaining an undeveloped atmosphere in its dispersed recreation areas. At this time signage in the area surrounding CCF exists and is adequate to meet current management needs, though the Forest Service will continue to assess these needs as they evolve.

108. Signage in the vicinity of CCF should be improved to discourage people from getting lost.

Response: See response to comment 107.

109. The Cleveland National Forest should overstate the difficulty of the hike to CCF to discourage unprepared hikers from making the trip.

Response: The Cleveland National Forest endeavors to provide visitors with accurate, true information. Therefore, while the forest can educate visitors about potential hazards associated with recreation on National Forest System lands, it cannot overstate these hazards.

110. Signage rather than fencing on the cliff faces and above CCF will sufficiently deter visitors from jumping from the cliffs.

Response: See response to comment 3.

111. Warning and mileage signage should be placed in increments along the SDRG Trail and Eagle Peak Road (Trail) to educate visitors about the remaining distance to CCF.

Response: The Forest Service does not typically install mileage markers on its trails, and rather concentrates educational and warning signs at trailheads. However, the Forest Service is currently in the process of developing and installing mileage markers in quarter-mile increments along the trails that lead to CCF.

112. How will the Forest Service warn hikers about the difficult trail conditions and the need to take adequate water?

Response: See Section 2.1.2 of the EA.

Social Setting

113. To allow impacts to the San Diego Country Estates equal in magnitude to those during the summer of 2011 is unacceptable.

Response: See Section 2.1.2 of the EA.

Visitor Use Permits

Issuing Visitor Use Permits

114. How will parking areas be monitored to ensure that all vehicles have visitor use permits?

Response: The proposed visitor use permit system will require that hikers seeking to enter the visitor use permit area surrounding CCF have a visitor use permit on their person or in their group rather than in their vehicle. The Code of Federal Regulations (CFRs) does not grant the Forest Service the authority to require parking permits. Visitor use permits therefore cannot be specific to an individual trailhead or vehicle. See Appendix B to this document for additional details on the mechanics of the visitor use permit process.

115. A visitor use permit system should be implemented to manage the number of visitors allowed to access the area surrounding CCF. The visitor use permit should consist of a stub left in the visitor's vehicle and a stub kept on the person of every visitor associated with the vehicle.

Response: See response to comment 114, Appendix B, and Section 2.1.2 of the EA.

116. The Cleveland National Forest should assign a specific number of visitor use permits to each trailhead that leads to CCF.

Response: See response to comment 114.

117. If 75 visitor use permits will be offered each day 25 should be made available for online reservation and the remaining should be available on a first-come, first-served basis at each trailhead.

Response: Visitor use permits would not be offered in person on a first-come, first-served basis because the Cleveland National Forest does not have the workforce capacity to accommodate this workload, and given the capacity such an approach would still not be a cost efficient use of personnel. Further, offering visitor use permits in person on a first-come, first-served basis would unfairly favor locals visiting this popular recreation destination.

In accordance with national Forest Service policy, visitor use permits will be reservable through the National Recreation Reservation Service (NRRS) (FSM 2334.35), which will provide all members of the public with an equal opportunity to obtain a visitor use permit. Individuals without a credit card can use a debit or prepaid card to obtain a visitor use permit from NRRS.

118. Visitor use permits should be issued for morning or afternoon hours to control hiker turnover in the project area.

Response: Forest Service policy requires that all reservable recreation opportunities be managed through the National Recreation Reservation Service (NRRS). NRRS does not specify the time of day that visitors are allowed to use their visitor permits. Rather, the visitor use permits are valid throughout the course of the day for which they are issued, and any potential issues with hiker turnover will be addressed via the adaptive management process outlined in Section 2.1.2.1 of the EA if necessary.

119. Residents from SDCE and other organized groups should be granted special access to CCF, either by giving them a waiver for the visitor use permit requirement or by granting them a permanent visitor use permit.

Response: The national public share equal ownership in public lands, including the Cleveland National Forest, with residents of SDCE. Therefore, residents of SDCE and other groups who may wish to visit CCF must obtain a visitor use permit consistent with the requirements for other members of the public.

120. A special allotment of visitor use permits should be set aside for residents of SDCE.

Response: See response to comment 119.

121. The Forest Service should issue visitor use permits only to residents of SDCE.

Response: See response to comment 119.

122. Individuals with a Military ID card (active duty or retired) or a California Distinguished Veteran Pass should be given a waiver for the visitor use permit requirement.

Response: See response to comment 119.

123. Some visitors like to use the trails in the area surrounding CCF, but do not actually visit CCF. The Forest Service should not require a visitor use permit to hike on the trail.

Response: The proposed visitor use permit system would apply only to the area immediately surrounding CCF and would not impact trail users who do not seek to visit CCF. For further information see Appendix B, Figure, 2 and Section 2.1.2 of the EA.

124. Visitation patterns at CCF vary greatly by season and day. A visitor use permit should not be required to visit CCF on days when use is predicted to be low, because many days only a small handful of people visit CCF.

Response: See Section 2.1.2.1 of the EA.

125. Unmonitored use of the SDRG Trail threatens the safety of visitors to CCF as well as the success of the project. The EA should address how this area will be monitored and how visitors in violation of the visitor use permit requirement will be handled.

Response: Monitoring is an integral part of the proposed adaptive management system. See Section 2.1.2.1 of the EA for an overview of how the visitor use permit area will be monitored. Response to comments 53 and 62 describe the typical Forest Service approach to law enforcement and how law enforcement officers typically address violations of area regulations or laws, including those that occur at CCF.

126. The draft EA fails to address if other users of the trail and trailhead such as equestrians, bicyclists, hikers, and hunters must have a visitor use permit to access the trailhead and trail.

Response: Appendix B and Section 2.1.2.1 in both the EA and draft EA explains that visitors to the SDRG Trail (including equestrians, bicyclists, hikers, and hunters) will not be required to obtain a visitor use permit unless they seek to access the visitor use permit area in the immediate vicinity of CCF, as depicted in Figure 2 of the EA and draft EA.

127. Will there be visitors coming from other parking locations on foot? What are current and future bicycle and equestrian uses in the area, and how will non-parking visitors be accounted for?

Response: Residents of SDCE have visited the area surrounding CCF by foot, bicycle, and horse in the past and will likely continue to do so in the future. It is therefore likely that this area will continue to accommodate visitors who travel to the trailhead by a variety of means.

Historically some equestrian and bicycle use occurred in this area, though in recent years this use has been dwarfed by the volume of hiking use. It is likely that the volume of non-hiking use in this area will remain relatively consistent in the future, though the management of visitation at CCF under the proposed action may result in equestrian and bicycle use comprising a larger share of total use since total use will decrease under the proposed action.

See response to comment 126 for an overview of how visitors who do not drive to the trailhead will be accounted for.

Use Levels and Quotas

128. The number of visitor use permits issued should be based on law enforcement capabilities and environmental analysis.

Response: Initial use levels under the proposed visitor use permit system are based on a balance between achieving baseline resource conditions and providing public access to CCF. Use numbers can be adjusted up or down according to a series of metrics that define a baseline condition. For further information about the proposed adaptive management approach see Section 2.1.2.1 of the EA. Sections 3.1 through 3.3 of the EA describe the environmental and social effects of the project's alternatives.

129. The project description states that there will be a limited number of visitor use permits that visitors may reserve. Is this number based on parking capacity?

Response: See response to comment 128.

130. The Cleveland National Forest should base the number of visitor use permits it issues on the parking capacity at the SDRG Trailhead.

Response: See response to comment 128.

131. Determining the correct number of visitor use permits to issue in one day is a challenging task. The Cleveland National Forest should start with a low number of visitor use permits and increase the number of visitors permitted to visit CCF only if hiking traffic is manageable.

Response: See response to comment 128. Additionally, see comments 135 and 137 to understand the diversity of public opinion regarding use levels at CCF.

132. The proposal to initially permit 75 visitor use permits of up to 5 to access CCF each day is allows too many people in the project area. The Cleveland National Forest should start out

by allowing 25 visitor use permits per day, or a number that is lower than the number of parking spaces available at the SDRG Trailhead.

Response: See response to comment 128.

133. It is possible that many more visitors than the 75 groups permitted to visit CCF will use the SDRG Trail each day, which would impact the neighborhood adjacent to the trailhead to a greater degree than anticipated in the draft EA.

Response: See response to comment 126, 128, and 134. Additionally, the management of parking and traffic congestion is outside the jurisdiction of the Forest Service and is the responsibility of the County.

134. The proposal to initially offer 75 visitor use permits per day is too high. Such a level of use will result in crowding, noise, and pollution at CCF. Further, parking is not adequate for this level of use prior to considering the number of unpermitted hikers, mountain bikers, and equestrians that may park in trailhead areas.

Response: See response to comments 126 and 128. Additionally, see comments 135 and 137 to understand the diversity of public opinion regarding use levels at CCF.

135. The proposal to initially issue 75 visitor use permits per day is too low. This figure is based on estimates and does not capture use on busy days in 2007. The 2009 Decision Memo for the SDRG Trail and Trailhead predicted increased visitation. Increased public use of National Forest System lands is a positive trend.

Response: See response to comment 128.

136. The Forest Service is using law enforcement challenges to justify managing visitation to CCF. The draft EA does not demonstrate that issuing only 75 visitor use permits per day will address violations of regulations and/or the law.

Response: Section 1.4 of the EA outlines the purpose and need of the proposed action. This project proposes to address resource and social impacts associated with historically high levels of public visitation at CCF, not violations of regulations and/or the law. See response to comment 128 for further discussion of initial use levels under the proposed visitor use permit system, and how these use levels will conform with a baseline resource and social condition.

137. CCF is the most popular waterfall in San Diego County. It is not a “remote backcountry area.” Therefore it is not necessary to manage use at this site due to environmental impacts. A system that issued 160 visitor use permits per day would be sufficient to prevent most environmental impacts.

Response: The popularity of CCF does not diminish the remote and rugged characteristics of the landscape that surrounds CCF or the obligation of the Forest Service to address conflicts between recreational uses and sensitive resources.

The Forest Service is unaware of any environmental analysis that suggests that 160 visitor use permits per day would prevent most environmental impacts in the project area. See Section 2.1.2.1 of the EA for an

overview of how environmental and social concerns will be monitored as part of this project, and how the outcome of this monitoring will govern how many visitor use permits are issued each day.

Geographic Area

- 138. The eastern boundary of the proposed visitor use permit area should be extended to encompass the area above CCF.**

Response: The proposed visitor use permit area encompasses the area immediately above CCF. For further information see Figure 2 of the EA.

Parking

Existing Parking Issues

- 139. The EA should include a clear description of roads in the area that are affected by the existing parking and emergency access problems.**

Response: See Section 1.3 of the EA.

- 140. Is the project going to propose measures to prevent or reduce the potential for illegal parking, use of unofficial trails, or creation of illegal trails?**

Response: The Cleveland National Forest does not have the legal authority to implement or enforce parking restrictions on County-maintained roads, and so has limited abilities to address potential issues of illegal parking. Only the County can restrict parking on County roads, and currently no parking restrictions apply to any of the roads near the SDRG or Saddleback Trailheads. As such, no potential issues of illegal parking currently exist.

The creation of illegal trails will be addressed using wire fencing and other enforcement actions as necessary. Members of the public are free to access National Forest System lands as they wish unless they are otherwise closed by Forest Order. As such, use of social trails by the public is typically legal.

- 141. Hikers who do not have visitor use permits but may be seeking access to the San Diego River Gorge or the local trail system may park at the trailheads that serve the project area.**

Response: Parking facilities at the SDRG Trailhead are available for use by any forest visitor on a first-come, first-served basis. For further information see response to comment 127 and Appendix B to this document.

- 142. The Cleveland National Forest completed a survey in the past to determine that 29 parking spaces would be adequate for the SDRG Trail and Trailhead. In retrospect 29 parking spaces is not adequate to meet the interest of trail users.**

Response: The decision to develop 29 parking spaces at the San Diego River Gorge Trailhead was not explicitly made to meet all future demand for parking. Rather, this decision was made to move some parking off of County-maintained roads. Further, prior to the construction of the parking lot, forest visitors regularly parked on County-maintained roads in the San Diego Country Estates and additionally have consistently visited CCF since decades prior to the construction of the San Diego Country Estates. The San

Diego Country Estates was established and zoned by the County in 1975, long after members of the public had already established this area as an informal, albeit regular access point to CCF.

- 143. Issues associated with parking and traffic in the neighborhood adjacent to the SDRG Trailhead go back to 2005, so using 2007 as the baseline condition is unacceptable.**

Response: It is a matter of opinion that using 2007 conditions as a baseline for this project is unacceptable. The Forest Service assumes that the visitor use permit system will reduce congestion in SDCE, though the Forest Service does not have the authority to manage parking or congestion on public roadways. It is the responsibility of the County to manage parking and congestion on public roadways in SDCE.

Proposed Parking Improvements

- 144. The public scoping notice identifies an existing problem with parking at the Saddleback Trailhead, thus making it unsafe for vehicles to pass and rendering the road inaccessible for emergency vehicles. How will the project be designed to improved emergency access? Will parking be proposed to be prohibited or restricted on this road? If so, please describe the proposed mechanisms.**

Response: By managing the number of people allowed to access CCF each day via the proposed visitor use permit system, the Forest Service assumes that parking pressures at the Saddleback Trailhead will be relieved on many days. The Cleveland National Forest does not have the authority to establish parking restrictions at the Saddleback Trailhead along Eagle Peak Road because it is a County-maintained road.

- 145. Any design for trail or parking improvements should include elements to discourage ongoing issues of off-road motorcycle use.**

Response: The initial proposal to develop trail or parking improvements was dropped prior to the publication of the draft EA. See response to comment 34 for additional information.

- 146. New parking facilities should not be constructed at the Saddleback Trailhead because use at CCF is already too high.**

Response: See response to comment 34.

Parking, Other

- 147. The Forest Service should construct a trailhead at the terminus of Ramona Oaks Road. Trailhead facilities at the end of Ramona Oaks Road would not impact neighboring residents, but would allow for much more overflow parking as compared to the current facilities.**

Response: The final EA has been updated to include a discussion of the alternative to construct a new trailhead at the end of Ramona Oaks Road. For further information see Section 2.1.6 of the EA. Additionally it should be pointed out that while the construction of a new trailhead at the end of Ramona Oaks Road, approximately ½ mile from the SDRG Trailhead, may not impact SDCE residents that have thus far expressed concerns related to the SDRG Trailhead, this alternative would likely impact an entirely new set of stakeholders living adjacent to Ramona Oaks Road in SDCE.

- 148. In 2005 a number of SDCE residents together recommended that the SDRG Trailhead be located at the end of Ramona Oaks Road. This alternative would reduce the length and elevation gain of the hike, would better accommodate visitor traffic than the streets surrounding the current trailhead, would allow for horse trailer access, would not be visible from most nearby residences, and has utilities available. Public input was not adequately considered in the decision to construct the SDRG Trailhead at the end of Thornbush Road.**

Response: This project was not designed to revisit the previous Forest Service decision to construct an official trailhead in the current location of the SDRG Trailhead, which for decades has historically been used by members of the public as an unofficial trailhead. The purpose of this project is rather to address a variety of issues resulting from a pattern of increasing public use at CCF.

Given the challenging terrain off the end of Ramona Oaks Road it is likely that sustainable trail design that accommodates the contours of the land would result in a longer, not shorter hike. The perspectives of local residents were one among many other factors that led to the 2009 decision to construct the trailhead in its current location; the opinion of one individual or a group of individuals does not necessarily trump other factors or the input of other members of the public. See Section 2.1.6 of the EA for a brief treatment of the alternative to construct a new trailhead at the end of Ramona Oaks Road as part of this project.

- 149. The draft EA should contain additional alternatives because the proposed action is the only viable alternative. The construction of a parking lot at the end of Ramona Oaks Road should be analyzed as an alternative in the EA.**

Response: The final EA has been updated to consider the construction of a trailhead and parking lot at the end of Ramona Oaks Road. For further discussion of this issue see Section 2.1.6 of the EA. The alternatives examined in detail are the only alternatives that have been identified thus far that would be feasible for the Forest Service to implement.

- 150. A number of stakeholders, including individual members of a dialogue group convened by the Forest Service, recommended that the Forest Service construct a trailhead at the end of Ramona Oaks Road. The SDCE HOA verbally offered to grant a permanent easement to the Forest Service to construct this parking area. The Forest Service did not consider this alternative in the draft EA.**

Response: The final EA has been updated to consider the construction of a trailhead and parking lot at the end of Ramona Oaks Road. For further discussion of this issue see Section 2.1.6 of the EA.

- 151. There is no official horse trailer parking in the vicinity of the SDRG Trailhead. Horse trailer parking should be developed at the end of Ramona Oaks Road and at the Saddleback Trailhead to allow for improved equestrian access to the San Diego River Gorge. The Forest Service is discriminating against equestrians by not proposing equestrian facilities at the end of Ramona Oaks Road, as was originally proposed as a part of this project in the Saddleback area.**

Response: The Forest Service does not provide facilities for all types of users in all locations, nor is the Cleveland National Forest proposing any construction in the vicinity of the SDRG Trailhead as part of this project. See Section 2.1.6 of the EA for an explanation as to why no facilities were proposed at the end of Ramona Oaks Road at this time. See Section 2.1.5 of the EA for an explanation as to why the proposal to develop parking facilities at the Saddleback Trailhead was dropped.

152. The metric related to parking suggests that the Forest Service is attempting to increase the average level of parking on neighborhood roads to 50 motor vehicles per day.

Response: The adaptive management metric related to parking presented in the draft EA was dropped because the Forest Service does not have the authority to manage or regulate parking or congestion on County roads.

153. The draft EA states that the visitor use permit is not intended to prevent parking on County roads in the vicinity of the SDRG Trailhead. Yet, it also states that traffic on neighborhood streets places children and other residents at risk when they walk or ride bicycles in their neighborhoods.

Response: Discussion of risk as it relates to traffic congestion in the draft EA refers to the extreme level of congestion observed in the spring of 2011, which was characterized by hundreds of cars in SDCE each day. Parking occurs daily on public roads across San Diego County, and in many locations throughout the County many hundreds of motor vehicles may park in a single neighborhood in one day. Section 1.4 of the EA explains that this project is intended to address a variety of issues associated with the extreme growth in use levels at CCF that have occurred in the past five years, including public safety. The Forest Service assumes that by managing public use of CCF, congestion in SDCE will be vastly reduced as compared to extreme levels observed in 2011. The Forest Service also does not believe that public use of County roads in SDCE places adjacent residents at undue risk more than in other comparable locations across the County.

To elaborate further, the County of San Diego Public Road Standards defines Residential Cul-De-Sac roads as being designed to accommodate fewer than 400 average daily vehicular trips (Section 4, p. 16). Residential Loop roads less than 600 feet in length are designed to accommodate fewer than 200 average vehicular trips (Section 4, p. 16). The County of San Diego Public Road Standards states, "Loop roads in excess of 600 feet shall be constructed to residential or residential collector standards in accordance with projected average daily trips" (Section 4, p. 16). Residential and Residential Collector roads are designed to accommodate fewer than 1,500 and fewer than 4,500 daily trips, respectively (Section 4, p. 9).¹⁵

According to Forest Service measurements on May 23, 2012, Thornbush Road is 1,270 feet in length.¹⁶ Thornbush Road forms a loop with Cathedral Way. If Thornbush Road is indeed considered to be a Residential Loop road it would have been designed according to County standards to accommodate fewer than 1,500 average daily trips at a minimum.¹⁷ Cathedral Way is 900 feet in length according to Forest Service measurements and forms a loop with Thornbush Road. It would therefore have been designed according to County standards to accommodate fewer than 1,500 average daily trips at a minimum. Bellbottom Way, Cherish Way, and Love Lane are Cul-De-Sac roads, and so would have been designed according to County standards to accommodate fewer than 400 average daily trips.

Given the allowable traffic volumes presented in the County of San Diego Public Road Standards, projected average traffic levels under the proposed action, detailed in Section 2.1.2.1 of the EA, will have minimal to no impact on the capacity of the roads adjacent to the SDRG Trailhead. In fact, the extreme levels of traffic observed in 2011 and described in Section 1.3 of the EA would also likely have not resulted in average daily

¹⁵ The County of San Diego Public Road Standards can be found at <http://www.sdcountry.ca.gov/dpw/docs/pbrdstds.pdf>.

¹⁶ For the sake of consistency measurements were made by GPS and using a distance measuring wheel. The distances measured by these respective devices were within three feet of one another.

¹⁷ Thornbush Road would not be considered a Residential Cul-De-Sac Road because it exceeds 600 feet in length (Section 4, p. 16).

trips exceeding County design standards. Therefore, according to County standards projected traffic volumes associated with the proposed action will not place local residents at undue risk.

It should also be noted that SDCE was established with minimal buffering next the National Forest System lands and preexisting recreational uses. It would have been the responsibility of County planners at the time that SDCE was established to foresee potential increases in recreational conflicts or uses on roadways adjacent to the long-term access point to CCF from Ramona.

154. The draft EA does not identify how the project will relieve traffic and parking impacts to the SDCE neighborhood adjacent to the SDRG Trail.

Response: Section 3.3.4 in the EA discusses how the Forest Service assumes that the proposed action will reduce use at CCF and therefore relieve congestion and parking issues in SDCE. See response to comment 153 for further discussion of this issue.

155. The Forest Service did not take into consideration future parking challenges and suggested that County roadways in the vicinity of the trailhead would handle the offsite parking needs of visitors. County roadways cannot provide adequate parking for these visitors, thus creating a significant, unmitigated impact to the environment on County facilities. The Forest Service must take responsibility for mitigation of future parking issues caused by the trail.

Response: See response to comments 32, 46, and 153. Members of the public in San Diego County are entitled to park on County public roadways unless otherwise posted by the County. The Forest Service does not have the authority to manage parking on County roadways. Additionally, the Forest Service assumes that by managing public use at CCF, historic issues pertaining to parking in SDCE will improve.

156. Beach communities routinely accommodate thousands of motor vehicles on summer days, resulting in heavy traffic and all available street parking being occupied. No law prohibits parking on public streets elsewhere, so the Forest Service should not limit parking on County roads adjacent to its trailhead.

Response: The Forest Service does not have the authority to limit parking on County roads and is not proposing to do so.

157. Why should residents of SDCE be subject to the burdens of Forest Service administrative decisions that allow parking on County roads?

Response: The Forest Service does not have the authority to manage parking on County roads. Only the County has the authority to restrict or prohibit parking on County roads and thus far the County has not elected to disallow parking on County roads in the vicinity of the SDRG Trailhead despite Forest Service suggestions to do so.

158. Public parking on County roads should be a non-issue for the Forest Service. This is a City, County, and/or law enforcement issue.

Response: See response to comments 153, 155, 156, and 157.

Trails

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- 159. The Cleveland National Forest should ensure that it manages litter and trash collection in order to maintain the visual qualities of CCF and the surrounding landscape.**

Response: The proposed adaptive management system that will determine visitor use levels at CCF is based on a baseline condition that is in part defined by the ability of the Cleveland National Forest to keep up with the management of litter in the visitor use permit area. For further information see Section 2.1.2.1 of the EA.

- 160. The Cleveland National Forest should regularly pick up trash and conduct maintenance activities in the CCF area.**

Response: See response to comment 159.

Roads

- 161. The Cleveland National Forest should restore vehicular access to CCF via Eagle Peak Road (Trail).**

Response: The Cleveland National Forest has discussed the restoration of vehicular access along Eagle Peak Road (Trail) to improve law enforcement and emergency response capabilities. However, the County currently has jurisdiction over this portion of the Eagle Peak Road (Trail). Further, the restoration of this portion of the road would be extremely costly. The comment also does not address the purpose and need of the project.

Corrections and Clarifications to the Draft EA

- 162. The response to comment 54 in the draft EA (response to comment 80 in the EA) provides incorrect information with regard to the support of local residents, availability of an easement, and the location benefits of a trailhead at the end of Ramona Oaks Road.**

Response: The response to comment 54 in the draft EA was updated in the final EA (see response to comment 80) to reflect more detailed information as to the 2009 decision to construct the SDRG Trailhead in its current location.

- 163. Comments 33-37 in the draft EA (comments 54, 56, 57, and 58 in the EA) are not adequately addressed by referring to response to comment 32 (response to comment 53 in the EA).**

Response: The relevant responses have been updated in the EA to reflect additional detail.

- 164. The word “managing” in the Summary of the draft EA should be changed to “prohibiting” alcohol consumption and cliff climbing.**

Response: This comment is largely a matter of semantics, though “managing” was changed to “prohibiting” in the summary of the EA.

- 165. Response to comments 69 and 70 in the draft EA (response to comments 98 and 99 in the EA) do not address overnight camping as stated.**

Response: Comment 69 in the draft EA does not mention overnight camping. Response to comment 70 in the draft EA (response to comment 99 in the EA) has been updated to address camping.

166. The proposed trail from the Saddleback Trailhead to the Eagle Peak Preserve property will increase use to this area.

Response: The Cleveland National Forest dropped from consideration the proposal to construct a trail connection between the Saddleback area and the Eagle Peak Preserve property prior to issuing the draft EA. See Section 2.1.5 of the EA for additional information.

167. The discussion of the existing condition in the draft EA is not clear as to whether the baseline condition is represented by the current public closure or the several years preceding the closure. Based on the dates of the scoping notice and draft EA, as well as the descriptions of the alternatives, the current state of [temporary] closure should represent the baseline condition. In this case, the proposed action would likely result in significant impacts to the physical, biological, and social environments.

Response: The baseline condition is represented by historic conditions and public use patterns at CCF, not conditions under temporary Forest Orders. Forest Orders expire one year or less after being issued. The dates of the scoping notices and draft EA are coincidental with respect to the current Orders in place at and around CCF. Additionally, these Orders were put into place precisely to provide a respite from baseline conditions so that the Forest Service could complete planning for the proposed action, including issuing a scoping notice, draft EA, and final EA.

The proposed action directly addresses historic and ongoing public safety issues and environmental impacts in the project area by managing public use at CCF and tying future use levels at CCF to a baseline condition defined by the metrics presented in Section 2.1.2.1 of the EA. The project will not result in new impacts nor will it lead to an increase in historic levels of impact. Therefore, no significant impacts exist.

168. Section 1.3 of the draft EA notes historic volumes of vehicles parked in the vicinity of the SDRG Trailhead is 200-300 per day and a maximum is assumed to be 730 per day. More information must be provided in order to properly evaluate this data. This information also raises the issue whether or not these volumes should be used as default values for calculations in the document. If so, the document should be revised to include this information and evaluate its significance.

Response: The data cited in the above comment was collected by the San Diego County Traffic Advisory Committee, as cited in Section 1.3 of the EA and draft EA. This is the only known traffic volume data available at the SDRG Trailhead outside of ongoing, anecdotal Forest Service observations. These observations do roughly corroborate the data collected by the County Traffic Advisory Committee, which was used by the San Diego County Department of Transportation to authorize parking restrictions in SDCE, although to this date these parking restrictions have not been implemented.

This data represents the baseline condition for this project given that it is presented in the “Existing Condition” section of the EA and draft EA. See response to comment 167 for further discussion of the concept of a baseline. The Forest Service assumes that by managing public use at CCF past patterns of congestion in SDCE as reflected in the discussion of baseline conditions in Section 1.3 of the EA will be reduced. Beyond representing the baseline condition in this project there is nothing significant known about this data.

- 169. The visitation estimations in Section 1.3 of the draft EA note that on the busiest weekend day observed in 2011 an estimated 2,190 visitors accessed the SDRG Trailhead and Trail. An estimate of the “busiest weekend day” in the CCF area should include visitors coming from both trailheads.**

Response: Section 1.3 of the draft EA reads, “On the busiest weekend day observed in 2011 this estimate of average vehicle occupancy yields a figure of approximately 2,190 individuals accessing the SDRG Trail and Trailhead.” This statement does not purport to convey a visitation estimate for the greater CCF area.

This being said, as stated in Section 1.3 of the EA and draft EA approximately 80 vehicles parked along Eagle Peak Road in the vicinity of the Saddleback Trailhead on a busy day in 2011. Using an average vehicle occupancy estimate of 3, this would yield approximately 240 additional visitors to CCF for an estimated busy day total of 2,430 visitors.

- 170. Appendix C should include the dates for the scoping period.**

Response: The date of the scoping notice is listed in Section 1.6 of the EA and draft EA, titled “Public Involvement.”

Miscellaneous and Outside the Scope

- 171. The analysis should include figures and graphics of County-maintained roadways that are affected by the existing parking and emergency access problem.**

Response: Section 1.3 of the EA and draft EA list and describe the County roads that are affected by existing parking and emergency access problems. These roads are easily viewed on Google Maps or other mapping sites. Providing further detail on these roads in the form of figures and graphics is beyond the scope of this analysis.

- 172. The Cleveland National Forest did not adequately forecast the impacts of the original developments to the SDRG Trail and Trailhead to the San Diego Country Estates neighborhood.**

Response: This comment is outside the scope of this project.

- 173. The Cleveland National Forest is not interested in adopting the recommendations from members of the community surrounding the SDRG Trailhead, and rather has an internally designed agenda that does not regard the community input it solicited.**

Response: The Cleveland National Forest takes and values all public input into account equally. As such, the public participation process is not a “vote,” and a given group of stakeholders does not have more influence in a project than any other group. For further information about the public participation process, see the “Comment Analysis and Response” description at the start of Appendix C.

- 174. Parking prohibitions have been approved by the County of San Diego. If traffic stemming from visitation to the Cleveland National Forest impacts homeowners adjacent to the SDRG Trailhead, these prohibitions may be put into place. Parking prohibitions could relocate existing issues associated with parking to Ramona Oaks Road.**

Response: The County of San Diego has full jurisdiction to manage parking issues on County-maintained roads. Further, it is the perspective of the Forest Service that has been communicated to the County that more comprehensive parking restrictions than those that have been proposed would directly address and may solve many of the issues outlined in Section 1.3 of the EA.

- 175. A number of environmental concerns associated with visitation to Mildred Falls could be addressed by the installation of guard rails and signage to dictate the flow of foot traffic near CCF.**

Response: Issues associated with visitation to Mildred Falls are outside the scope of this project.

- 176. The Cleveland National Forest should consider constructing new trails in the vicinity of the San Diego River to meet the public demand for access to free-flowing streams.**

Response: The Cleveland National Forest is seeking via this project only to manage recreational issues and demand at CCF, and is further not aware of high levels of public demand for access to other parts of the San Diego River Gorge.

- 177. The Cleveland National Forest should not build a new road in the project area.**

Response: The Cleveland National Forest is not proposing to build any new roads in the project area.

- 178. The closure of the area surrounding CCF should only be temporary.**

Response: The closure of the area surrounding CCF, which was initially implemented in July, 2011, was temporary. Access to CCF via the Saddleback Trailhead was restored on April 1, 2012.

- 179. The SDRG Trail and Trailhead should be reopened promptly. The irresponsible acts of a small subset of visitors are impacting other, responsible recreationists who seek access to this area.**

Response: The Cleveland National Forest is currently working to balance access concerns with the challenges outlined in Sections 1.3 and 1.4 of the EA, and will reopen the SDRG Trail and Trailhead when these challenges can be managed.

- 180. The Cleveland National Forest should require that visitors to CCF have an Adventure Pass.**

Response: The Forest Service does not have the legal authority to require that visitors display an Adventure Pass outside of Standard Amenity Fee Sites and High Impact Recreation Areas. The larger area around CCF does not currently have the amenities required to be classified as a Standard Amenity Fee Site or High Impact Recreation Area, and so the Cleveland National Forest is unable to require that visitors have an Adventure Pass to visit this area.

- 181. The Cleveland National Forest should build a bridge across the San Diego River in the vicinity of CCF.**

Response: The Cleveland National Forest has analyzed potential resource impacts associated with recreation at CCF. The rock stepping stones currently placed in the San Diego River at its junction with the

SDRG Trail are adequate to mitigate potential resource impacts associated with foot traffic through this area, and so the forest is not currently considering building a bridge across the San Diego River.

- 182. If visitation levels at CCF regularly exceed 100 people at one time it will be necessary for the Cleveland National Forest to develop infrastructure improvements adjacent to CCF to accommodate this use.**

Response: The proposed adaptive management system defines a baseline condition based on a number of resource conditions. Potential impacts to the resource base, not the number of people visiting CCF, will determine the need for potential future management action. For further information about the proposed adaptive management system see Section 2.1.2.1 of the EA.

- 183. Access to the project area should remain closed until the Cleveland National Forest is able to implement a new management system that manages public use of CCF.**

Response: Access to CCF via the Saddleback Trailhead was restored on April 1, 2012. Future decisions on access will be revisited as needed.

- 184. The issues observed at CCF in recent years need to be addressed. However, instituting a visitor use permit system would be an unacceptable response to these issues.**

Response: This comment does not elaborate as to why the proposed visitor use permit system is unacceptable, nor does it offer any other ideas to address the issues observed at and around CCF in recent years. Further, the Forest Service believes that the proposed action is the best available tool to balance resource and social concerns with continued public access to this popular recreation destination.

- 185. Eagle Peak Road (Trail) is a County road and therefore should be open to public off-highway vehicle use.**

Response: This comment is outside the scope of this project.

- 186. A number of suggestions submitted during the scoping period were rejected using a variety of bureaucratic excuses, such as “no CFR authority,” “not required by law,” “not the responsibility of the Forest Service,” “prohibited to discriminate,” etc.**

Response: The Forest Service is required in planning and implementing projects to adhere to federal laws, agency policy, and Land Management Plan direction.

- 187. Does the proposed action include the installation of an early warning sound alarm system for fires?**

Response: This comment is outside the scope of this project. Campfires are prohibited outside of fire rings in developed recreation sites across the Cleveland National Forest, and this project therefore does not address issues associated with campfires because they are already prohibited in the project area.

- 188. The SDCE community is very concerned about the threat of wildfire.**

Response: See response to comment 98.

189. A home was recently broken into near the SDRG Trailhead.

Response: This comment does not pertain to this project. Further, the SDRG Trailhead and Trail were closed at the time of this burglary.

190. Impacts to residents near the SDRG Trailhead are adequately balanced by the benefits these residents enjoy due to their proximity to the improved trail system.

Response: This statement is conjectural and is outside the scope of this project.

191. Visitor use permits are not needed for the vast majority of day hikes on public lands, many of which are more impacted than the CCF area. Examples include Bright Angel Trail in Grand Canyon National Park, various hikes in Yosemite National Park, Angels Landing in Zion National Park, and various hikes in Joshua Tree National Park.

Response: This comment is outside the scope of this project.

192. The proposed action is over-reaching in its attempt to improve public safety. There are many places on public lands that are more dangerous than CCF.

Response: This comment is outside the scope of this project.

193. The sub-heading “Social Impacts” in Section 1.7 of the draft EA is incorrect because it diminishes the actual challenges faced by residents due to parking problems. This sub-heading should be changed to “Quality of Life Issues.”

Response: This comment is a matter of semantics and is outside the scope of this project.

194. The 2009 “Initial Study” [Decision Memo] on the construction of the SDRG Trail and Trailhead highlighted a number of concerns expressed by SDCE residents and stated that the project would address these concerns. When the project was implemented, none of the concerns raised by local residents were addressed. In essence, all of the transportation and traffic findings in the initial study [Decision Memo] were wrong.

Response: The 2009 Decision Memo on the construction of the SDRG Trail and Trailhead notes that some SDCE residents had expressed concerns regarding forest visitors parking on County roads. By constructing a parking lot this project directly addressed these concerns. It should additionally be noted that only the County can prohibit or restrict public parking on County roads. The Forest Service has neither the authority nor the obligation to prevent public use of and parking on County roads.

The Decision Memo also notes that residents of SDCE had complained of trail users requesting to use bathroom facilities and to obtain drinking water. A restroom facility was constructed at the trailhead as a component of the 2009 project and the Forest Service continues to work with the Ramona Municipal Water District, San Diego County Water Authority, and the Metropolitan Water District of Southern California to address onerous local regulations related to the provision of potable water at the SDRG Trailhead, which is outside the jurisdictional boundary of these water authorities.

Beyond the concerns shared by SDCE residents, the construction of the SDRG Trail and Trailhead directly addressed a number of other resource and safety concerns. Concerns expressed by a specific interest group such as residents of SDCE do not necessarily take precedence over the concerns of other members of the public or those related to environmental impacts, health and safety, public access, or other issues.

The 2009 Decision Memo predicted that following the construction of the SDRG Trail and Trailhead a limited amount of additional use of this site may occur as a result of the improvements. The improvements indeed may have attracted additional use, but it should be emphasized that public use at CCF and at other waterfalls across the Palomar Ranger District had grown exponentially due to factors unknown by the Forest Service in 2009 prior to the time the trail and trailhead were completed in 2011. As such, it is unlikely that the trail and trailhead improvements alone resulted in this extreme growth in public use at CCF because much of this growth in use occurred during the two years preceding the completion of the trail and trailhead project.

195. Eagle Peak Road (Trail) should be rehabilitated to allow for ATV and Side by Side vehicle use. User conflicts would be addressed through the visitor use permit system.

Response: This comment is outside the scope of this project. This being said, the area surrounding Eagle Peak Road (Trail), including the trail, is zoned in the Cleveland National Forest Land Management Plan as Backcountry Motorized Use Restricted. To open this trail to motorized use would directly contradict Land Management Plan direction. Further, allowing the use of motorized vehicles on a trail that is frequented by hikers, equestrians, and bicyclists would likely result in significant public safety concerns and user conflicts. It is not clear how the proposed visitor use permit system, as purported in the above comment, would address these issues.