

# WESTERN SLOPE NO-FEE COALITION

P.O. Box 135, Durango, CO 81302

970/259-4616

[www.WesternSlopeNoFee.org](http://www.WesternSlopeNoFee.org)

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June 3, 2008

David Baker  
Recreation/Wilderness Program Lead  
San Juan Public Lands Center  
15 Burnett Court  
Durango, CO 81301

Dear Dave:

The following comments are made in response to the press release dated May 12 advising of the opportunity to have input into the Recreation Facility Analysis process on the San Juan National Forest.

Recreation Facility Analysis—formerly known as Recreation Site Facility Master Planning—is a 7-year-old Forest Service program that has been extremely controversial. In late 2006 the Chief of the Forest Service temporarily halted the program in order to undergo intensive internal review. One of the key findings of the internal reviewers was that there was not enough public participation and that the public had not been adequately informed about the RSFMP process. Despite that finding and a recommendation that there should be much greater transparency and public review, the only real change that has occurred has been the change of name to Recreation Facility Analysis. This change, many believe, was primarily to get the word “Planning” out of the program’s name to deflect those of us who contend that the process should be subject to NEPA procedures.

You and other SJNF managers have been well aware that there is intense local interest in your RFA plan. In press interviews during the summer of 2006, you were quoted as saying that the SJNF’s plan would be available in late September or early October. When I inquired about it by email on October 10, 2006, you wrote back,

*“Both Mark Stiles and the Regional Office still need to review it, so I am at least a month off on my estimate of when I going to release the document for a 60 day review.”*

In December 2006, an article in the Durango Herald revealed that six sites were slated for closure, but they were unable to obtain information about which sites those were. In that article, Deputy Regional Forester Greg Griffith was quoted as saying,

*“The next step is public involvement. We will do a lot of public involvement in this.”*

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When I again inquired about the availability of the RFA plan in February 2007, I was told that

*“We do not have a firm target for release of the recreation facility master plan for the San Juan. First, we plan to meet with county commissioners and other locally elected officials to determine how they want to be involved with the analysis and decision-making process, and to seek their ideas and understanding. Our goal is to make sure they have the opportunity to weigh in on the FS campgrounds, picnic areas, and other recreation facilities in and around their communities that their constituents value. It is imperative that they understand what we are doing and how it impacts their communities and how we might work with them to deliver quality recreational opportunities for the public.”*

In June 2007 the report of the Forest Service internal review team said that the San Juan’s plan was complete, so I again requested a copy. Thurman Wilson wrote back,

*“I looked at the status report you mention. It is in error - we only have a draft of the “proposed program of work” or PPOW. We put it on hold until we could catch up on some other priorities, mostly getting the draft forest plan to the printer for public comment. We have a couple more steps to do working with a draft PPOW, then we will make it available for review and comment. We aren't doing any implementation actions based on it at this point and won't before getting public feedback. We realize the Coalition is interested in it and will let you know when we have the draft available.”*

In August 2007 our then-President, the late Robert Funkhouser, was told in a phone conversation with Regional Recreation Business Systems Program Manager Pam DeVore that the SJNF’s plan was complete and had been approved at the Regional level. I again requested a copy and you replied,

*“Our Recreation Facility Analysis is still being finalized. We will send you a copy or a link to our web site as we go out for public comment. It has been over a year since we last worked on the analysis and we have some new managers so I would like to complete some internal briefings before we restart the public participation.”*

The plan has now been released with a cover date of April 17, 2008 and announced in a press release dated May 12. The press release contains only superficial mention of the management changes proposed, and nothing at all about the new fees proposed, which you surely knew would be the most controversial part of the plan.

The plan itself, like all RFA plans, is difficult to decipher and understand. It is written in code and presented in a format that is neither easy to understand nor obvious in what it is disclosing. Yet after nearly two years of stonewalling and delay, you are allowing the public only 34 days to read, understand, and comment on it. I know of no effort to meet with county commissioners, as was promised in February 2007. You are not holding any public meetings where people can ask questions and gather enough information to make informed comments. You are not even living up to your original promise of a 60-day public “review” period.

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Any claim that there has been public participation in the San Juan's RFA plan is absurd. When you receive—as you will—very little public comment, it will not be because the public understands and approves of the plan. It will be because they have been deceived about its contents or are not aware of its existence.

Despite the lofty language in your RFA plan, its purpose is the same as that of the entire national RFA process: to reduce the number of maintained recreation sites and to ensure that those sites which remain open will be the least costly to maintain and/or the most profitable to operate.

The plan calls for tearing out facilities that have served the public for 50 years in order to achieve miniscule savings, imposing legally questionable fees at trailheads, overlooks, and undeveloped camping areas, and adding expensive amenities at taxpayer expense to developed campgrounds that are operated for profit by private businesses while removing facilities at smaller, more remote campgrounds. These are bound to be unpopular actions, and your avoidance of subjecting them to meaningful public scrutiny is unacceptable.

Toilets and picnic tables were never installed in National Forests to be moneymakers. Recreation Facility Analysis is about economics, not caring for the land and serving people.

Thank you for this opportunity to comment. Please provide a copy of the final plan and the decision that approves and implements it.

Sincerely,

Kitty Benzar  
President

cc:

U.S. Senator Wayne Allard  
U.S. Senator Ken Salazar  
U.S. Representative John Salazar  
Archuleta County Board of County Commissioners  
Dolores County Board of County Commissioners  
La Plata County Board of County Commissioners  
Montezuma County Board of County Commissioners  
San Juan County Board of County Commissioners

Attachment: Log of email communications about RSFMP/RFA between San Juan Forest officials and myself between October 2006 and May 2008.

WESTERN SLOPE NO-FEE COALITION

Email Log between Kitty Benzar and San Juan National Forest regarding Recreation Site Facility Master Planning and Recreation Facility Analysis

**October 10, 2006**

**From:** [Western Slope No Fee Coalition <wsnfc@earthlink.net>](mailto:wsnfc@earthlink.net) [[Add to Address Book](#)]  
**To:** [abond@fs.fed.us](mailto:abond@fs.fed.us)  
**Cc:** KSUT Victor Locke <[victor@ksut.org](mailto:victor@ksut.org)>, Durango Telegraph <[will@durangotelegraph.com](mailto:will@durangotelegraph.com)>  
**Subject:** RSFMP Plan for SJNF  
**Date:** **Oct 10, 2006 8:50 PM**

Hello Ann,

In recent interviews, Dave Baker told the press that the RSFMP Plan for the San Juan NF would be released to the public in late Sept or early Oct. Now that we are in that time frame, I wonder if it is available and if so, please send me a copy.

Kitty Benzar  
970/259-4616

**October 11, 2006**

**From:** [David J Baker <djbaker@fs.fed.us>](mailto:djbaker@fs.fed.us)  
**To:** [wsnfc@earthlink.net](mailto:wsnfc@earthlink.net)  
**Cc:** Ann Bond <[abond@fs.fed.us](mailto:abond@fs.fed.us)>, Pam DeVore <[pdevore@fs.fed.us](mailto:pdevore@fs.fed.us)>  
**Subject:** San Juan Recreation Facility Master Plan  
**Date:** **Oct 11, 2006 9:32 AM**

Thanks for your note; I am running late getting the five-year action plan finish. Both Mark Stiles and the Regional Office still need to review it, so I am at least a month off on my estimate of when I going to release the document for a 60 day review. I have some big writing assignments for the Land Management Plan and that are our current number one priority till the end of October. Once the Land Management plant has been sent out for internal review I will finish the Rec. Facility Master Plan and get you a copy.

By the way have you been contacted about joining the Recreation Resource Advisory Council?

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David Baker  
San Juan Rec/Wilderness Lead

## WESTERN SLOPE NO-FEE COALITION

San Juan Public Land Center  
djbaker@fs.fed.us  
(970) 385-1240

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### February, 2007

[Approx Feb 20, 2007: Message from Kitty to Dave asking for an update on when the 5-Year plan will be available. Exact text not available]

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### February 22, 2007

From: Ann Bond <abond@fs.fed.us>  
**Sent: Feb 22, 2007 12:12 PM**  
To: Western Slope No Fee Coalition <wsnfc@earthlink.net>  
Subject: Re: San Juan Recreation Facility Master Plan

Dave - use this to answer the question:

We do not have a firm target for release of the recreation facility master plan for the San Juan. First, we plan to meet with county commissioners and other locally elected officials to determine how they want to be involved with the analysis and decision-making process, and to seek their ideas and understanding. Our goal is to make sure they have the opportunity to weigh in on the FS campgrounds, picnic areas, and other recreation facilities in and around their communities that their constituents value. It is imperative that they understand what we are doing and how it impacts their communities and how we might work with them to deliver quality recreational opportunities for the public.

Ann Bond  
Public Affairs Specialist  
San Juan Public Lands Center  
15 Burnett Court  
Durango, CO 81301  
970 385-1219  
[abond@fs.fed.us](mailto:abond@fs.fed.us)

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### February 23, 2007

WESTERN SLOPE NO-FEE COALITION

Western Slope No Fee Coalition wsnfc@earthlink.  
To Ann Bond <abond@fs.fed.us>, djbaker@fs.fed.us  
**02/23/2007 09:48 PM**  
cc pdevore@fs.fed.us

Subject Re: San Juan Recreation Facility Master Plan

Dear Ann and Dave,  
Thanks for your reply.  
Could you please notify me of the dates and times of the meeting you referred to with our local elected officials about the San Juan's RSFMP plan? I assume these will be public meetings as per Colorado's Sunshine Law, and I would like to have the opportunity to attend.  
Thanks,  
Kitty

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**February 26, 2007**

**From:** [David J Baker <djbaker@fs.fed.us>](mailto:djbaker@fs.fed.us) [[Add to Address Book](#)]  
**To:** Western Slope No Fee Coalition <wsnfc@earthlink.net>  
**Cc:** Ann Bond <abond@fs.fed.us>, pdevore@fs.fed.us  
**Subject:** Re: San Juan Recreation Facility Master Plan  
**Date:** **Feb 26, 2007 11:59 AM**

We will keep you posted.

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David Baker  
San Juan Rec/Wilderness Lead  
San Juan Public Land Center  
djbaker@fs.fed.us  
(970) 385-1240

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**June 1, 2007**

Western Slope No Fee Coalition  
<wsnfc@earthlink.net>  
To [djbaker@fs.fed.us](mailto:djbaker@fs.fed.us)  
**06/01/2007 11:56 AM**  
cc Ann Bond <abond@fs.fed.us>  
Subject SJNF RSFMP Plan of Work

Dear Dave,

The recently released RS-FMP Public Participation Review Report contains as one of its Key Recommendations that all forests that have completed their RS-FMP Proposed Plan of Work should "share those plans with the public."

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The chart in the Report indicates that the San Juan is one of the forests whose PPOW is complete. As per the Review Team's recommendation, may I have a copy of it?

Kitty Benzar 970/259-4616

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**June 4, 2007**

From Ann Bond/R2/USDAFS

To Thurman Wilson/R2/USDAFS@FSNOTES

**06/04/2007 09:10 AM**

cc Elizabeth M Haydon/R2/USDAFS@FSNOTES

Subject Fw: SJNF RSFMP Plan of Work

Whoever is the most knowledgeable about this should answer Kitty's request for information ASAP - I would not counsel to wait for Dave to return. I think it is important to get back in touch with her now. Please let me know who handles. thanx.

Forwarded by Ann Bond/R2/USDAFS on 06/04/2007 09:09 AM -----  
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**June 4, 2007**

**From:** [Thurman Wilson <twilson02@fs.fed.us>](mailto:twilson02@fs.fed.us) [[Add to Address Book](#)]

**To:** [wsnfc@earthlink.net](mailto:wsnfc@earthlink.net)

**Cc:** Jennifer M Burns <[jmburns@fs.fed.us](mailto:jmburns@fs.fed.us)>, Ann Bond <[abond@fs.fed.us](mailto:abond@fs.fed.us)>, David J Baker <[djbaker@fs.fed.us](mailto:djbaker@fs.fed.us)>

**Subject:** Re: Fw: SJNF RSFMP Plan of Work

**Date:** **Jun 4, 2007 3:30 PM**

Kitty,

Dave is out of town for a few weeks. Ann forwarded your message to me.

I looked at the status report you mention. It is in error - we only have a draft of the "proposed program of work" or PPOW. We put it on hold until we could catch up on some other priorities, mostly getting the draft forest plan to the printer for public comment. We have a couple more steps to do working with a draft PPOW, then we will make it available for review and comment. We aren't doing any

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implementation actions based on it at this point and won't before getting public feedback. We realize the Coalition is interested in it and will let you know when we have the draft available.

\*\*\*\*\*  
Thurman Wilson  
Planning & Public Services Staff  
San Juan Public Lands Center  
15 Burnett Court, Durango, CO 81301  
(970) 385-1246 email: twilson02@fs.fed.us  
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**August 10, 2007**

Western Slope No Fee Coalition  
<wsnfc@earthlink.net>  
To Baker SJNF <djbaker@fs.fed.us>  
**08/10/2007 12:13 AM**  
cc Ann Bond <abond@fs.fed.us>  
Subject RFA (RSFMP) Plan of Work

Dear Dave,  
I was told in June by Thurman Wilson that the SJNF's RSFMP Plan was nearly complete. At that time, action on RSFMP was on hold pending the release of national guidance based on the report of the Review Team. As I'm sure you know, that national guidance is now available at

<http://www.fs.fed.us/recreation/programs/rfa/action-plan-from-public-part-rev-04-02-2007.pdf>

It says:

Action • At a minimum, National Forests & Grasslands that have completed Recreation Facility Analysis 5-year proposed programs of work will notify the public of the availability of this document.

In a recent phone conversation with the WSNFC President, Pam DeVore said that the SJNF plan is one of those that is complete and has been approved.

May I get a copy, please?

Kitty Benzar

WESTERN SLOPE NO-FEE COALITION

**August 15, 2007**

**From:** [David J Baker <djbaker@fs.fed.us>](mailto:djbaker@fs.fed.us) [[Add to Address Book](#)]  
**To:** Western Slope No Fee Coalition <[wsnfc@earthlink.net](mailto:wsnfc@earthlink.net)>  
**Cc:** Pam DeVore <[pdevore@fs.fed.us](mailto:pdevore@fs.fed.us)>  
**Subject:** Re: RFA (RSFMP) Plan of Work  
**Date:** **Aug 15, 2007 9:04 AM**

First, let me express my sympathy to you and your organization on the loss of Robert Funkhouser.

Our Recreation Facility Analysis is still being finalized. We will send you a copy or a link to our web site as we go out for public comment. It has been over a year since we last worked on the analysis and we have some new managers so I would like to complete some internal briefings before we restart the public participation.

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David Baker  
San Juan Rec/Wilderness Lead  
San Juan Public Land Center  
djbaker@fs.fed.us  
(970) 385-1240  
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**May 12, 2008**

From David J Baker <[djbaker@fs.fed.us](mailto:djbaker@fs.fed.us)>  
To [wsnfc@earthlink.net](mailto:wsnfc@earthlink.net)

Date **Mon, May 12, 2008 at 1:39 PM**  
Subject Fw: Recreation Facility Analysis Released for Public Comment

May 12, 2008

Here is the press release and link to our Recreation Facility Analysis. Let me know if you have any question or need a hard copy.

\*\*\*\*\*  
David Baker  
San Juan Rec/Wilderness Lead  
San Juan Public Land Center  
djbaker@fs.fed.us  
(970) 385-1240  
\*\*\*\*\*

----- Forwarded by David J Baker/R2/USDAFS on 05/12/2008 01:36 PM -----

## WESTERN SLOPE NO-FEE COALITION

FOR IMMEDIATE RELEASE: May 12, 2008  
San Juan National Forest Releases Recreation Facility Analysis for  
Public Comment  
(See attached file: Rec Facility Analysis.doc)

The San Juan National Forest has released a Recreation Facility Analysis that describes the vision for the overall recreation program and outlines proposals specific to individual developed recreation sites.

“The goal is to make sure our facilities are environmentally sustainable, provide support to and are supported by local communities, and offer a fiscally responsible cost-benefit ratio for management,” said David Baker, San Juan National Forest Recreation Lead.

The San Juan National Forest operates an extensive developed recreation program, currently operating 40 developed campgrounds, five dispersed camping areas, 12 day-use areas, seven boat ramps, five visitor centers, eight scenic overlooks, three fire lookout towers/cabins, and 46 trailheads. The analysis calls for the majority of these sites to be maintained into the future, however, services at others will undergo changes.

“Many of the San Juan’s developed recreation facilities were built 30 to 50 years ago and require significant deferred maintenance to remain safe and operable,” Baker said. “Other facilities receive no or little use, and no longer serve their original purpose.”

The analysis calls for many upgrades to help bring camping facilities up to date and encourage occupancy by improving campsites, electrical hookups, toilets, water systems, signing, and parking. Cost-saving measures include using partnerships and volunteers to help maintain trailheads and boat ramps.

The major change proposed for the Pagosa Springs Ranger District is to permanently close the Wolf Creek Campground, which has been temporarily closed due to diseased falling trees and flooding. The nearby West Fork Campground will remain open.

The Dolores Ranger District will continue to offer fishing access at the Dolores Fishermen’s Access Area adjacent to the Dolores Cemetery but will not replace the chronically vandalized toilet. The Sage Hen Fishermen’s Access Area will remain open for day-use only. Below the dam, Metaska Picnic Area will continue to offer vehicle access to the river but will not be operated as a formal recreation site.

Some of the changes proposed for the Columbine Ranger District include closing the East Lime Creek Rest Area on U.S. Highway 550 across from the Andrews Lake Recreation Area. In La Plata Canyon, three dispersed

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camping sites would be closed due to problems with resource damage, vandalism, sanitation, and trespassing on adjacent private lands. Two other dispersed sites would be upgraded. Kroeger and Snowslide campgrounds would also see improvements.

The analysis may be viewed online at [www.fs.fed.us/r2/sanjuan/recreation/facility](http://www.fs.fed.us/r2/sanjuan/recreation/facility).

Comments may be submitted by Monday, June 16, 2008 via mail to David Baker, San Juan Public Lands Center, 15 Burnett Court, Durango 81301, email to [djbaker@fs.fed.us](mailto:djbaker@fs.fed.us), or fax at 970 375-2331.

For more information, contact David Baker at 970 385-1240.

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this msg was sent to you by:  
Ann Bond  
Public Affairs Specialist  
San Juan Public Lands Center  
15 Burnett Court  
Durango, CO 81301  
970 385-1219  
[abond@fs.fed.us](mailto:abond@fs.fed.us)

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**May 12, 2008**

From Kitty Benzar <[wsnofee@gmail.com](mailto:wsnofee@gmail.com)>  
To David J Baker <[djbaker@fs.fed.us](mailto:djbaker@fs.fed.us)>

cc Pauline Ellis SJNF <[peellis@fs.fed.us](mailto:peellis@fs.fed.us)>, [abond@fs.fed.us](mailto:abond@fs.fed.us), Mark Stiles SJNF <[mstiles@fs.fed.us](mailto:mstiles@fs.fed.us)>

Date **Mon, May 12, 2008** at 5:35 PM  
Subject Re: Fw: Recreation Facility Analysis Released for Public Comment

Dave,  
Thanks for sending the RFA PPOW.  
I am dismayed and horrified to see fees proposed at Little Molas Lake (a direct betrayal of promises made by Pauline), Lower Hermosa Trailhead (including all the horse facilities built by the 4Corners BCH???), South Mineral Dispersed Camping (does NOT meet the requirements of the FLREA for charging a camping fee!), La Plata City Dispersed Area (same), Miners Cabin Dispersed Area (don't know where that is, but dispersed camping implies few or no facilities you can't charge for that), Molas Pass IS (Don't know what IS stands for, and what is a "short stop" fee, and how do you enforce a fee just for buses?)  
Please call me. 259-4616 [He never did]