US Forest Service, Coronado National Forest

ATTN: Emily Reynolds, NEPA Planner

300 West Congress Street

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Subject: South Fork Day Use Area Draft Environmental Assessment (EA)

We thank the USFS for the time, attention and comprehensive effort that it has given to South Fork’s future. We commented on the initial proposal last fall (Nov. 3, 2019) and comment below on the Draft EA.

Our primary concern continues to be the conservation and integrity of the unique flora and fauna of South Fork, as we outlined in our comment last fall. We welcome the anticipated input of the USFWS with regard to preserving this unique ecosystem management area and furthering the plans for the proposed Cave Creek Canyon Birds of Prey ZBA. We stress the singular quality of South Fork and the need for stewardship of a vulnerable living environment that cannot speak for itself. We still believe that the site merits an Environmental Impact Study (EIS). Given the USFS recognition of the special and dynamic nature of South Fork’s biologically diverse ecosystem, we hope that this season’s (2020) presence in South Fork and Cave Creek Canyon of rare Eared Quetzals will also merit study.

We support Alternative A: No Action

We recognize the considerable USFS and community efforts to consider the location and nature of this proposed construction project. Such processes raise the risk, however, that USFS adopts an assumption that Cave Creek Canyon needs a new concrete/hardscape and building site. Then, in an effort to fashion a “compromise”, USFS agrees to shift the location of the new facility, as it is proposing to do here.

We urge USFS not to assume that USFS must “do something.” Please return to first principles: Why does Cave Creek Canyon, and especially the South Fork riparian area, need new construction?

We urge you to consider the argument against disrupting the unique South Fork ZBA with construction, adding a larger roadway, aggregate walkway, ramp, parking lot and structures, and leaving unresolved questions of maintenance and funding for upkeep.

The Draft EA recognizes that the proposed construction will disturb the small South Fork ecosystem, including through noise, cutting, excavation, fill, foreign materials and heavy equipment. There will inevitably be delays. All this work will be near the creek bed, nesting areas, and protected trees and plants. The USFS proposal acknowledges some of these risks, but then disposes of them by claiming measures will “reduce” them – a notably imprecise word. USFS should frankly acknowledge these factors are “costs.”

Once USFS has installed the new facility, someone will have to maintain it. USFS states it cannot commit to paying these expenses. The debate within the community – and even among donors to FOCCC – should raise serious questions for USFS about who will pay for costs of care and upkeep. Experience should caution USFS that practice usually falls short of initial statements. Such a gap may not matter as much for roadside/highway service facilities, but this project concerns a rare, even unique, natural location in the United States.

USFS’s assessment must also inquire whether this new facility will in fact create an “attractive nuisance” that could lead to despoiling South Fork and its watershed. The added noise will disturb rare birds. The runoff from the site may harm both the creek and surrounding vegetation. Given the proposed size and facilities, some visitors may decide to stay overnight in campers or cars. Social trails will expand the site boundaries.

USFS should weigh these costs and risks against the alleged benefits of new construction along South Fork – especially because the Sunny Flat campsite and facilities are not far away.

USFS’s statements treat this project as a “replacement”. But South Fork has never had a hardscape site of this scale. The older site was a trailhead; USFS is proposing to build a “destination.” Moreover, the ecosystem has not had any facilities – other than two portable toilets – since 2014. The USFS should confront the fact that this project is new construction, not a “replacement”. Insofar as USFS relies on restoring facilities from the 1930s, it needs to consider advances in environmental science and awareness over the past century.

Then consider the other supposed justifications for the new construction:

1. Toilets: They can be found at nearby Sunny Flat (within a half mile of the new site), at the Visitor Center (two miles distant) and campgrounds up-canyon. If USFS believes visitors to a wildlife and birding area need even more ready toilet access, it should consider options to retain the portable toilets, perhaps limiting tipping with sandbags and inexpensive “coyote” fencing (that would also screen USFS cabins)
2. Education Center: Cave Creek Canyon already has such facilities at the Visitor Center, Southwest Research Center and commercial sites such as Cave Creek Ranch and the Chiricahua Desert Museum.
3. Picnic benches: These are available nearby at Sunny Flat, Herb Martyr, and up canyon. Many people sit on existing rocks, or return to local commercial eating locations. Picnic benches encourage claiming individual sites for longer periods, and personal grilling.
4. Parking spaces: Currently at the berm there is similar capacity (approx. 9 cars). There are spaces along NF42 and many options to pull off the road. Visitors also can park in camping areas. As for parking on busy days, we believe that South Fork’s natural uniqueness justifies visitors walking instead of another parking area. As for turnaround space, longer vehicles have never been encouraged; signs announce they cannot cross the Chiricahuas. Responsible drivers should go no further than the circular lot at the Visitor Center.
5. Trash bins: Visitors can find bins throughout the canyon. The USFS can also encourage a “pack it in, pack it out” green policy. If these alternatives do not suffice, USFS could consider adding trash bins in locations without adding an acre-sized building site.
6. Interpretive signs: A USFS plan to add signs at notable locations in Cave Creek Canyon would fundamentally change the canyon. The USFS reference to the absence of such signs as a “problem” looks like a questionable rationalization to lengthen a list.

Finally, USFS works from a premise of a need “to accommodate visitor demand….” Yet USFS never specifies its assumptions about – or plans for – visitor growth within the Chiricahuas or Cave Creek Canyon in particular. The only number of visitors cited, and not specifically for South Fork, are from the FOCCC -run Visitor Center and shop, for four years. FOCCC celebrated 10,000 plus visitors in 2019. If USFS or some members of FOCCC seek to boost the number of visitors, it would be useful to know the visitation goal and how this South Fork project, and perhaps others in the future, relate to the expansion plan.

The South Fork of Cave Creek is a special – and relatively small—riparian ecosystem. It is famous around the world for its birdlife – and offers natural wonders that are unique in the United States. The USFS should face a high burden before constructing an acre site of hardscape and structures within its ZBA, especially given the nearby facilities at Sunny Flat.

In assessing your proposed project, please begin with and remain cognizant of the duty to do no harm.

Thank you for your consideration.

Sherry and Robert B. Zoellick