Thank you for the opportunity to comment on the EA for the proposed South Fork Day Use area. I have been a Portal property/homeowner since 1996. My comments are made through the lens of an avid hiker and birder, and a retired environmental educator /elementary school teacher. I am a member of both Friends of Cave Creek Canyon and the Chiricahua Regional Council. My thoughts about the project have evolved over time. I appreciate the efforts that the USFS and community members have put into both the project proposal and comments about the EA.

I am disappointed that only two choices are under consideration: Choice A (no action) and Choice B (proposed action). We all are very aware that the Portal area and the surrounding Coronado National Forest are a treasure. When projects are proposed we need to make sure we get it right! Getting it right may mean a compromise between the all or nothing choice. Listed below are my comments and concerns:

1. **Page 2** *The purpose of the proposed action is to replace the former day use site in the South Fork of Cave Creek Canyon with sustainable facilities to accommodate visitor use while reducing negative environmental impacts to the area.*

Since the proposal is being built in a previously undisturbed site, I object to it being called “a replacement.” Calling it a ‘replacement” downplays the fact the we will be losing an acre of pristine creek-side habitat in a ZBA. Proposal B is a plan for additional recreational development beyond the former baseline. It is misleading to call it a “replacement”.

1. **Page 5/6** *A gate would be installed near the day use site for a seasonal closure approximately March 1–June 30 (but dates subject to annual change) of South Fork Road. Excluding cabin owners and USFS personnel, vehicles would not be permitted to drive the length of South Fork Road during the seasonal closure. The road would be available for the public to use for other activities such as walking or birdwatching.*

Is this a mitigation measure for the disturbance caused by the Proposal B? My fear is that the road closure is being dangled out as a carrot to appease people who are opposed to or have concerns about Proposal B. I suspect there are too may complications and possibly too much opposition for a road closure to actually happen. Frankly, I fear this idea will be abandoned if Proposal B is approved. The EA needs to clearly state who decides “dates subject to annual change” and under what circumstances. I support closing the road to vehicles during the spring at the height of nesting season. I frequently walk and bird the road. During the spring there are too many cars and too much dust to walk the road comfortably and safely. Most importantly, I suspect we might be able to view more wildlife activity along the road corridor with a seasonal closure. A season road closure is a wonderful opportunity to create an additional 3/4 mile safe corridor where people of all ages can walk and enjoy nature. I support the idea of having a few unobtrusive benches along the road to allow people to rest and observe nature.

1. **Page 6** *“The total disturbance area is estimated at under one acre (see Figure 1 for project area). The total construction timeframe of the site is estimated to take approximately four months with heavy equipment being used for approximately two to four weeks during the total construction period.”*

I have spent time walking along the proposed site and trying to envision it with parking, a bathroom, picnic tables, and a trail. The site is beautiful and pristine. It is the home of Trogons, Spotted Owls, and other unique flora and fauna. My preference is to keep it that way- without disruption to the landscape. I suspect there are other areas outside of South Fork that are not as sensitive where a needed ADA compliant restroom, trail, and picnic tables can be placed. I hope that a more suitable location will be found.

1. **Page 10** *Zoological-Botanical Areas (ZBA) – The proposed site would be within the designated South Fork of Cave Creek ZBA, a 786-acre area designated to ensure protection of the unique flora and fauna found in this area. The proposed site is also within the proposed Cave Creek Canyon Birds of Prey ZBA, a 25,764-acre area which hosts the densest known population of breeding raptors in the U.S.*

It has been determined that South Fork consists of very special habitat for a variety of reasons. It needs to stay that way with no or minimal construction disturbance. Conservation of South Fork should be the priority.

1. **Page 12** “*If the proposed border wall were constructed, both illegal and DHS activities in the Chiricahua*

*Mountains may decrease, which would benefit recreation settings in Cave Creek. “*

**Page 14** *If the proposed border wall were constructed, both illegal and DHS activities in the Chiricahua*

*Mountains may decrease, which would benefit recreation settings in Cave Creek Canyon.*

What is the propose of having a statement about the border wall in the EA? This is a very controversial subject. Please remove it from the document.

1. **Page 13** *Installing an accessible trail/path with benches and boulders to sit on would allow visitors of all ability levels to walk through the forest and along the creek, and this path would also facilitate the FoCCC’s environmental education activities.*

I am concerned about the creek becoming a “play area”. In my mind this is not compatible use in a ZBA. I fear added noise and human presence in a new area will disturb the unique and often rare birds that utilize the South Fork water corridor- especially in times of drought.

I support the environmental education mission of FoCCC and appreciate the efforts of community members who have assisted in the programs that have been given. However, currently I oppose using South Fork as a staging area and base for those activities. During my 30 year career in environmental education/ classroom teaching, I found that children are motivated to be good land stewards by the enthusiasm of their guide and by the activities they do- not the scenery. I would prefer to see environmental education activities done in less sensitive parts of the canyon. The VIC area and nearby nature trail seem perfect for these activities. I would appreciate seeing the official FoCCC environmental education plan/guidelines.

1. **Page 13** *Installing an interpretive kiosk would allow visitors to learn about the unique natural and cultural resources in the area. Educated visitors tend to respect and care for these resources, which reduces the likelihood of resource damage in the future.*

Interpretive kiosk information should include birding and photography etiquette. I have seen too many people chase after birds off trail to take a photo or a get a better view (in particular Trogons) This information would be better suited at the VIC because it applies to the entire canyon, not just South Fork. I would like to see information about dog etiquette as well. Dogs off lease are a concern for our ground nesting species such as the Painted Redstart and Red-faced Warbler.

1. **Page 14** *O&M costs for a new developed site are estimated at $10,000–$15,000 per year. The FoCCC have agreed to cover operation costs for 10 years. The facilities, however, are expected to last much longer. O&M costs for the CNF developed recreation program far exceed revenues. Should the FoCCC stop providing funds after 10 years, the CNF’s recreation program would become less sustainable and the CNF would need to consider how to cover these costs. An option would include removing the facilities (some could be relocated), but this would cost money to complete. If funding from the FoCCC ends, the CNF would need to use funds planned for other recreation work on the forest to pay for O&M or demolition costs at South Fork, which would result in a decline in maintenance or facility conditions at other recreation sites.*

This is a disturbing point. Why even consider Choice B if the USFS is stating that there may not be money to sustain the development. I do not think it is wise to be dependent on a volunteer organization to pay for O&M costs for 10 years- especially during these unstable and unprecedented economic times.

1. **Page 20**

 *Q. Are the proposed facilities subject to flood events below the 100-year flood event?
 A. Yes, most of the footpath, and the loop road as it enters and exits the project area. The remaining majority of the loop road, parking stalls, and restroom facility would not be in the 100- year floodplain.*

I have concerns regarding the suitability of the proposed site for development. Given past flooding issues, it seems unwise to build in an area that has the potential to be impacted by flooding again.

Thank you for your consideration. South Fork is world renowned for its scenery and unique flora and fauna. Being a good steward of this special canyon guides my thinking. Given there are only two choices, I support Proposal A- No Action. However, I hope the USFS and community can craft a workable solution. Let’s get this right.

Carol Comeau