Sept. 24, 2020

Subject: South Fork Day Use Area Draft Environmental Assessment (EA) 56779

I, Jackie Lewis, appreciate the extensive work done by the Forest Service in preparing the EA. I understand how difficult it can be to balance different desires and goals and to reach a consensus opinion.

I have lived in Paradise for 21 years and at the time I moved here the campground had been closed but the picnic area was well known and well used by birders, hikers, and nature enthusiasts. We’ve even turned more people on to knowing how important nature is and the desire to keep it accessible.

**Key points to me are:**

***Year-round accessibility***

***Educational outreach***

***Availability of picnic area, restroom and handicapped accessible trail***

***Financial sustainability to the Forest Service and to the community***

With a few exceptions I am in favor of this well thought out and balanced plan.

For the following reasons I support Alternative B Proposed Action (these have been supported by Friends of Cave Creek Canyon):

* South Fork is enjoyed by not just for birding, but for many different reasons such as hiking, biking, education, etc. Actually, more people go there for reasons other than birding than just for birding. All should have access.
* For many **decades**, this area provided a place for the local community to come and relax and enjoy nature. Picnic tables, benches and toilet facilities were used by visitors and the community. Since the floods of Sept., 2014, these have not been available.
* Picnic tables and benches, both suitable for mobility impaired people, will also help them to relax and enjoy the forest and other aspects of nature.  It has been well proven that relaxing in nature has wide health benefits and reduces stress.
* For everyone’s enjoyment and safety the above items must be replaced.
* There is **no** **handicapped accessible trail**, or even one for the mobility impaired on the eastern side of the Chiricahua Mountains. The only one[s] are in the Chiricahua Monument, on the western side. It is impossible for wheelchairs or walkers to use South Fork Rd. Furthermore, this short [approximately 200 yards] handicapped accessible trail in the plan is being paid for by an anonymous donation that is just for this trail. If there is no trail, the donation disappears.
* The only readily available toilet facilities in South Fork are 2 non-handicapped porta-potties. Based on the usage of these, there is definitely a need for vault toilets on South Fork. At some times of the year it is necessary to empty and clean these twice each week. Expecting the people to use the toilets at Sunny Flat will cause those tanks to fill up more rapidly, with the cost to empty also rising. The Sunny Flat system is very old and has had operational problems. It cannot handle a large increase in volume.
* The placement of the new vault toilet is in the **only** suitable place that is not in the 100-year flood plain, and where there is enough space for it and parking. This information comes from the FS hydrologist.
* The total space of this proposal is less than 1 acre, out of thousands of acres in Cave Creek Canyon, and hundreds of thousands of acres in all of the Chiricahua Mountains. It certainly seems that we could use that small amount of land to provide some amenities.
* The placement of the Day Use Area is not in heavily forested, nor wilderness habitat. It is not a pristine area. It is only partially with trees and plants as compared to the area abound the berm or upstream from there, which is truly pristine. It is a far less impinging place to put these very needed additions than further upstream. According to the Forest Service only **one** tree of any consequence will be cut down.

A number of comments have recommended unreasonable or unworkable solutions to the Draft EA. Some comments have been made by those who do not have complete knowledge of the overall aspects of the canyon and its current facilities. I will address some of unreasonable or unworkable solutions that have arisen:

* This area is for all the people, not just birders. It is for hikers, it is for handicapped, it is for other mobility-impaired, it is for the local community. There are many more non-birders and

- How can anyone tell a 90 year-old woman, “sorry we have to preserve the [blank], there is no place in the forest for you”

- Or the 80 year-old couple: there’s no place for you to walk safely in the forest.” What gives anyone the right to say that?”

* **Education Outreach in the forest makes a bigger impact**:
* Students are being taught how to respect everything in the forest and how the forest communities work together. Without field trips to see this in person lessons will have very little impact in their lives. They are learning how to watch wildlife without encroaching, listen to the sounds around them and even keep journals relating to what they’ve encountered.
* To provide Educational Outreach, according to our FOCCC Education Coordinator, we need to have access to the forest for the students, most of which are young.
* Last year our Outreach took a total of 70 students – over the year - into the forest for about 1 hour. If that was doubled, there would only be only 140 student-hours in the forest all year. That is a very small number! We do not have sufficient volunteers to expand the program even if we have access to more students, which we don’t.
* Improvement of rest room facilities is definitely needed because:

- Currently only 2 non-handicapped porta-potties are available at the berm.

- It is incredibly difficult to keep them clean.

- It cost thousands of dollars per year to maintain.

- If a young student or other needs assistance, there is no way for anyone to assist them.

* I completely fail to understand the objection to a staging area. This is a very small area [20x10 or 200 sq.’ with only 4-5 8’ benches, where a small group or family can get together. It can be used for the Educational Outreach program or any other programs. Likely, it would only be used infrequently. It certainly would not be an enticement to large groups – it can only hold 10-12 people. It is also a very minor expense of the entire project.
* The idea of converting the beautiful campground of Idlewilde into a Day Use Area is very poorly thought out. It does nothing toward solving the lack of facilities where they are needed. Additionally, it like all the campgrounds, are in the 100-year flood plain. It is not part of the Draft EA, which is what we are asked to comment on.

**Closing South Fork Road:**

**DON’T DO IT!**

I would like to see vehicles slowed down with the use of speed bumps or a lower speed limit – year-round – not just during nesting season.

I see NO reason to close the road at all during breeding season of the Trogon and Spotted Owl. If nesting is the reason for the closure, then it is certainly unfounded. None of the nesting birds have been affected by area visitors during breeding, nesting or fledgling seasons.

The Mexican Spotted Owl nests high up on the cliffs.  Fledglings come down to the canyon bottom later, but I am not sure they are likely to be harassed in South Fork. Is there any information about them being harassed in the past? We would like to see clarification of the closure reasons.

* For decades, in Cave Creek Canyon, Pinery Canyon, Schelite Canyon near Sierra Vista, and others, the Mexican Spotted Owl has been a highly sought-after species by birdwatchers.
* Even after being very sought-after by people, they still return to the same areas. Hundreds of people this year have gone to Pinery Canyon to see them where they bred successfully. Several reported that the owls would perch over tents and in one case was watching, and moving closer to, a tent where a snoring birder was still sleeping. In fact, because of the excessive dispersed camping this year, the favorite roosting spot was often over campers that were not in the campground.
* Yellow-billed Cuckoo is a very rare visitor to the Chiricahuas and has not nested here in the 21 years I’ve been here. It is doubtful that it would nest here because we don’t have the necessary dense cottonwood/willow forest along an adequate waterway.
* **Closing the South Fork Rd completely would have a major impact on the financial both for the Forest Service and for our community**:
* The fee area includes the entire area. I believe you would lose entrance fees because people will not 1) want to walk in that far or 2) be able to walk that far.
* There is not enough parking at the proposed site even with overflow at the beginning of Southfork Road to handle the number of vehicles that can go through each day during peak birding seasons. I believe this will also lead to lost entrance fees.
* It will have a detrimental impact on visitation to the Canyon and all of the mountains and the community.
* Many will not then come to the Canyon which will have a very negative impact on the businesses of the community.
* Of the comments made so far over 80% do NOT want the road closed. This road belongs to everyone.
* Handicapped and mobility-impaired will then have almost zero access to the canyon.

Exceptions and questions to the Draft EA:

* The following statement is unfounded in fact and creates an unneeded and unhelpful political tone in the South Fork EA. The statement has no impact on the EA itself or on the selection of an Alternative. This statement has no place in the EA.

RE: “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.”

* Estimated maintenance expense of $10,000-$15,000:  
  - FOCCC has agreed to pay the annual maintenance. However, this amount is very large. How is it derived?
* FOCCC may pay the maintenance, but that should be reduced by any revenue from the Day Use Fees and any donations.
* FOCCC will upon installation of the vault toilets, remove the porta-potties from the berm area which will save thousands of dollars per year for FOCCC.

Thank you for taking all comments into consideration. This area is vital to the health and spiritual well being of most area residents. It provides recreation, relaxation and healing to visitors. It is the heart of Portal and Paradise. Without year-round accessibility many businesses will struggle or fail, and the Forest Service will decrease fee income. We need to promote the Chiricahuas, not close them.

Sincerely,

Jackie Lewis

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