24 September 2020

U.S. Forest Service, Coronado National Forest

ATTN: Emily Reynolds, NEPA Planner

300 West Congress Street

Tucson, AZ  85701

Re: South Fork Day Use Area Draft EA

At the outset the Draft Environmental Assessment states that the proposed Alternative B is to replace recreation facilities lost in the 2014 Odile flood.  From my perspective, as a Portal home owner and multi decade user of South Fork, the lost facilities provided four main functions in decreasing order of use: 1) parking to access the canyon trail up canyon or road down canyon; 2) toilet facilities; 3) picnic tables; 4) group seating benches.  Also, from my perspective, forest visitors utilizing the parking and toilet functions while accessing the canyon significantly outnumbered users there to picnic or use the group benches.

Here are some personal thoughts on these four functions as well as the proposed road closure and need for Alternative B:

1)  Parking

If Alternative B is chosen and completed without any road closure (as some advocate) allowing full, year-round access to the berm parking area I see that as at least doubling parking capacity compared to the lost parking area.  That is addition not replacement.

The draft EA notes that the current berm parking area fills to capacity on busy days creating overflow parking issues.  If Alternative B is constructed and the road is closed beyond the new day use area during the busy months as proposed I would assume the new parking spaces would fill to capacity just as often creating similar overflow parking issues during the first year of operation.  Would this lead to pressure to keep the road open year-round to access the berm parking area?  If that happened we’re back to addition not replacement.

2)  Toilets

If I have interpreted the proposal correctly, Alternative B places the double vault toilet *immediately adjacent* to the estimated 100 year/24 hour flood overflow channel and in the narrow area between the overflow channel and the 100 year/24 hour floodplain.  Does that need more careful review?

On page 3 the Proposed Alternatives are introduced.  It is stressed under Alternative A that toilet facilities in South Fork may be lost in the future due to potential loss of support from FoCCC (*Portable toilets may not be provided indefinitely by FoCCC; over time, this area may not provide any developed facilities to support visitor use in South Fork).*  Though not directly stated, when read along with the next paragraph about Alternative B it almost suggests that Alternative B could solve the problem of the potential disappearance of toilet facilities in South Fork.  Further reading of the Draft EA shows this to be far from the case.  To be fair, Alternative B, right from the beginning, should include the same statement regarding loss of support with slightly different wording: *Funding to maintain and operate the vault toilets may not be provided indefinitely by FoCCC; over time, this area may not provide any developed facilities to support visitor use in South Fork*.

Both Alternatives face potential long-term funding issues.  If FoCCC toilet facility operation and maintenance funding was lost in the future it seems like the CNF would be in a better position with Alternative A.  Rather than raid what may still be a challenged CNF recreation budget by supporting either the ongoing operation and maintenance or demolition of Alternative B facilities (page 13), portable toilet facilities could simply be removed.

The Draft EA does not give an annual estimate of what it costs FoCCC to supply and maintain the two port-a-potties that have been operating since 2018, though on page 11 it suggests that an indirect effect of Alternative A is that FoCCC would have difficulty fulfilling its mission statement if it continues committing to the monetary burden of renting and maintaining the two port-a-potties.  It appears that the current FoCCC commitment runs 10 years through 2028.  Hypothetically, if Alternative B were completed by 2022 or 2023 and FoCCC commits to fund that operation and maintenance for 10 years ($10,000 to $15,000 per annum according to the EA) that would suggest FoCCC would suffer a significantly longer financial burden committing to Alternative B compared to Alternative A - and that’s not including the initial $100,000 outlay from FoCCC for Alternative B construction.  Perhaps the Draft EA should drop any statement regarding the hardship of FoCCC meeting its mission goals due to the financial burden of maintaining the existing port-a-potties without giving a fuller comparison of the short and long term financial costs to FoCCC for both Alternatives A and B.  Also, the Draft EA gives no estimate of how potential fees/donations collected at the Alternative B site would offset costs.  If fees/donations could be collected at the Alternative B site couldn’t they be collected at the current berm site to help offset toilet costs there?

I agree that South Fork without toilets creates a human waste problem.  I wholeheartedly commend FoCCC for identifying the human waste problem created after Odile and stepping up to organize and fund a solution.  If Alternative A is chosen could FoCCC use some of the funds it would save to work on a better solution than the existing port-a-potties?  Buy a handicapped access port-a-potty and modify it with a larger stainless steel custom holding tank to save money by cutting down on the number of trips to pump it - or does some system between a small port-a-potty and a vault toilet already exist?  If a larger holding tank were incorporated it would need to be very secure.  The existing port-a-potties have been pushed over by vandals and the Draft EA mentions concern about wind blowing them over.  Can they be cabled to the ground (as I’ve seen with some other public port-a-potties)?  Could they be relocated adjacent to the rock face and cabled to it?  If there is a better location than under the trees can a shade shelter be placed over toilets - perhaps one engineered to be strong enough to attach the toilets to?  Can rip-rap be constructed on the upstream side of the berm to help protect the berm and the berm parking area enough to allow a more permanent toilet facility?

3 & 4) Picnic Tables and Group Benches

Decades ago the now gone camp sites at South Fork were my favorite sites to camp in the Chiricahuas.  I’m glad they’re gone.  In light of growing visitor use trends, I don’t think camping is compatible with the special qualities of South Fork and the very unique recreation opportunities it provides.  I feel the same way about developing a new day use facility there.  I would rather see any new day use, if it absolutely needs to be provided, focused in the main canyon, perhaps adjacent to or incorporated within an existing campground.

Picnic areas equal trash production.  If no picnic facilities existed in South Fork the need for a bear-proof trash receptacle would be lessened.  In the past I haven’t noted a trash problem in South Fork Canyon whether it be the road, berm parking area, or the pre-Odile site.

How well is the hydrology of lower South Fork understood?  Does the Accessible Trail proposed in Alternative B run adjacent to a creek section that retains surface water when other sections dry up?  If so, will concentrated human use in that location negatively impact the habitat value for wildlife?

Proposed Road Closure

A seasonal road closure is proposed as part of Alternative B.  Proposed dates extend from March 1 through June 30, however, page 5 states these dates are subject to annual change.  The Draft EA does not state the full reasoning behind these start and stop dates or why they would be subject to annual change.  Page 12 gives one clue stating that the gate would be opened during monsoon season for safer evacuation by vehicle.  If evacuation during monsoon floods is a reason to keep the road open after June 30th, what about fire season during May and June?  Will evacuation concerns during fire season lead to completely removing the road closure from the proposal?  Or should fire and flood concerns lead to an opposite solution – keeping vehicles out of the canyon during flood and fire seasons?  Should the road closure extend further into the nesting season beyond June 30 for Trogons and other species if part of the reason for a closure is related to breeding?  Or are the proposed dates designed to cut down on disturbance rates in general during the busiest visitor period?

Page 11 states:  *Although the South Fork Road provides easy-access opportunities for walking and birdwatching, traffic on this road creates hazards and dust*. I have long enjoyed walking the South Fork road.  The views are spectacular and the birding and wildlife viewing exceptional.  With that said I typically avoid it during high visitor use periods.  Too many vehicles go too fast and raise too much dust for me.  On calm days the dust from a fast truck can linger in the canyon a long, long time.

If the CNF proceeds with Alternative B, I strongly suggest the road be closed at least as long as proposed.  I would even support a year-round closure.  Vehicular use of that road will increase in the future - more noise, more dust, and more disturbance.  South Fork deserves better.  Instead of focusing on what would be lost with a road closure I prefer to focus on gains.  A beautiful, peaceful and accessible walking trail that would be available to those with physical limitations that make trail hiking difficult.  If the FoCCC invested in a couple of wheelchairs with larger tires suitable for dirt roads they could be checked out for free at the visitor center and used to explore the South Fork road for those who could use such wheelchairs.  Over the years I’ve pushed folks in wheelchairs for miles and miles on dirt roads.  It can be wonderful.  On a quiet dirt road groups on natural history excursions can easily gather around leaders teaching about birds or flowers.  For those out to simply enjoy a beautiful drive the main canyon would still be available.

Besides providing gate keys to cabin owners and CNF personnel, local EMS would need keys.  A key could also be available on an as needed basis for other approved needs, for example volunteer trail crews.

The Need for Alternative B

Page 2 states:  *The need for this project is driven by the imbalance between visitor use and the level of services provided in the South Fork of Cave Creek Canyon*.

I would argue that right now the provided level of services appropriately matches the desires of the large majority of South Fork users.  I don’t perceive any significant imbalance.  Post Odile CNF leadership settled on constructing the berm parking area and eventually FoCCC generously provided needed toilet facilities.  I believe those two actions have already replaced the most needed and heavily used services lost during Odile.

My concern is for the future of South Fork.

The cumulative impacts section for Alternative B on page 26 gives a few statistics relative to what long time users of South Fork already know.  Visitor use is on the upswing and the rate of increase seems to be going up.  Page 26 further states:  *As urban/rural populations in Arizona grow and the visitation trends to Cave Creek Canyon increase, it is likely that new facilities in the South Fork of Cave Creek Canyon would contribute to already increasing visitation*.  I agree and believe that will be exaggerated even more if a seasonal road closure is not part of Alternative B.

One more quote from page 26:  *The proposed action would help to provide sufficient facilities to accommodate demand while supporting a high-quality outdoor experience*.  Two thoughts regarding this quote:

1. Can this perceived demand for that kind of a high-quality outdoor experience be accommodated elsewhere?  How about the main canyon adjacent to or incorporated within an existing campground?  Would Alternative B lead to a positive experience for a minority of South Fork users while being a negative to a majority of users, leading to a net loss of experiential quality?  After all, South Fork does support a very unique subset of National Forest visitors.
2. If the CNF decides to ‘accommodate demand’ by developing ‘sufficient facilities’ on undeveloped habitat within South Fork now, what will be the response in a few years when the new facilities no longer ‘accommodate demand’?  It’s not a large canyon.  It has exceptional biological and aesthetic value.  Why start down the path of accommodating demand by chipping away at the canyon’s exceptionalism?

In summary I support Alternative A: No Action.  I believe the proposed Alternative B development is not a good solution to meeting the perceived need to replace facilities lost to Odile.  If the CNF leadership decides there is in fact a need for ‘replacement’ facilities, then I think the solution should involve consideration of a larger geographic area including the main canyon as well as considering how to meet long term increases in demand while preserving South Fork as an intact, unfragmented unit, free from the burden of excessive traffic.

Sincerely,

John Roser