
From: Narca Moore [REDACTED]
Sent: Friday, July 30, 2021 2:13 PM
To: FS-objections-southwestern-coronado
Subject: Objections to South Fork Day Use Area, Coronado National Forest

Kerwin Dewberry, Forest Supervisor
Coronado National Forest
ATTN: Objections
300 W. Congress Street
Tucson, AZ 85701
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Dear Supervisor Dewberry,

Please consider these comments regarding the South Fork Day Use Area on the Douglas Ranger District of the Coronado National Forest. I also commented (within the prescribed period) during the Proposed Action Public Comment Period.

My three main issues are these:

1. The proposed Day Use Area is within the South Fork ZBA, and that canyon is designated in the most recent Forest Plan management maps as outside the allowable area of development. I am pleased to see, on the one hand, that the original proposed development has been scaled back; however, the new proposal still conflicts with the stated Desired Conditions for the South Fork Zoological and Botanical Area. It encourages intensified use of the ZBA—use that would certainly degrade the canyon’s natural values. These values are internationally recognized and appreciated by the public.

The FS needs a formal management plan for the South Fork ZBA, as well as the larger Cave Creek Canyon ZBA, which encompasses South Fork—this canyon system possesses immense and irreplaceable value because of its biodiversity and great beauty. In the absence of a management plan, no development should take place.

Yes, a bathroom is needed. Let’s improve the situation in that respect, keeping to the most minimal footprint possible.

A Day Use Area with sheltered picnic tables would be appropriate for the undeveloped circle within Sunny Flat Campground, where a bathroom already exists. Rustler Park for years has combined a campground with a Day Use Area.

2. I do not believe that adequate consideration has been given to the fact that the proposed development is exactly on top of the post-fledging area used by a pair of Mexican Spotted Owls. For years, the owls and their young have appeared here when the young fledge. They come because the place isn’t degraded and supports a good prey base. It’s as essential an area to raising their young as the nesting area itself. It’s my understanding that the FS did not tell USFWS about the post-fledging area, only about the PAC—thus, information about the post-fledging area did not inform the decision made by USFWS to allow the project.
3. I do support the seasonal road closure for the road into South Fork. Giving the canyon a break from motorized traffic for part of the year seems a solid conservation measure, designed both to help the habitat and wildlife and to make the road much more pleasant and safer for walkers. When Hurricane Odile closed the road for many months, walking there was a sheer delight. The bordering vegetation sparkled instead of being heavily coated in dust, and there was less disturbance to wildlife.

I have heard objections to the closure on the basis that walkers could have more impact on wildlife than cars that go by quickly. But, drawing on 50+ years of experience in the field and my degree in biology, I’d say that most birds quickly

adapt to seeing people move past their territories, as long as they aren't actually harassed. It all comes down to the behavior of the visitors, whether they arrive on foot or by car. A closure during nesting season would mean less disturbance—the closure after Odile definitely improved the level of disturbance.

Might I suggest a “soft” road closure, to meet the legitimate objections of a part of the public? The FS would decide on the best mechanism to achieve a compromise, which would not deny access to cabin owners or people with physical limitations. One possibility would be to close the gate, but not lock it, then place a sign giving permission for cabin owners and handicapped people (with the appropriate license plate or placard) to enter. Fines could be imposed on violators, if that becomes a problem.

People who are physically fit, and who still object to the closure, probably haven't discovered what a fine walk the road itself offers. I think of it as a wider trail through the wonderful bottomland of the canyon, in habitat that is more extensive than what occurs higher up.

Thank you for addressing these concerns. When I first came to South Fork in 1975, I knew I had found my home. It's precious to me.

Best regards,
Narca Moore

