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ATTN: Objection: South Fork Day Use Area  
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LEAD OBJECTOR:

Noel Snyder



July 30,2021

**RE: South Fork Day Use Area**

I hereby submit this Objection to the U.S. Forest Service's Draft Finding of No Significant Impact and Draft Decision Notice (Draft FONSI/DN) for "South Fork Day Use Area" on the Douglas Ranger District of the Coronado National Forest.

This Objection is filed pursuant to, and in compliance with, 36 C.F.R. Part 218, Subparts A and B. I filed timely, specific and substantive written comments in accordance with 36 C.F.R. 218(a).

The project that is subject to this Objection is the "South Fork Day Use Area" on the Douglas Ranger District of the Coronado National Forest.

I submitted timely, specific, and substantive comments during the Proposed Action Public Comment Period. All points and issues raised in this objection refer to issues raised in these documents, with the exception of new information brought forth in the Draft FONSI/DN not found in previous analysis documents.

In the following Statement of Reasons, I provide the specific reasons why the decision is being appealed and rationale on why the decision violates applicable laws and regulations.

My primary objection is that the proposed action violates the Coronado National Forest Plan, but in addition, as a long-time resident of Portal, I find the proposed new South Fork Day Use Area Project to be unwise and harmful in a number of respects, though it has been marginally improved from earlier drafts by removal of the handicap trail and amphitheater aspects. These aspects are not intrinsically bad ideas for Cave Creek Canyon, but are much better sited elsewhere than South Fork.

The proposed Day Use Area is located within a Zoological Botanical Area established some years back, and I believe this was indeed an appropriate designation for the area concerned because of its many unique and valued natural inhabitants. South Fork has become a highly favored destination for nature tours and local residents alike who visit

mainly to enjoy its varied wildlife and plant species. I believe this should continue to be the management emphasis for this area and that it is not an appropriate place for Day Use Area development which will inevitably degrade natural values in the location. There are other much more logical places nearby to provide picnic area type values if needed, for example the nearby Sunny Flats campground area or the Stewart Campground area. The South Fork Zoological Botanical Area needs to be kept free of such developments.

The former campground/picnic area that once existed in South Fork was established before the area was recognized as a ZBA and it is not recognized as a development worth maintaining or re-creating in the current Forest Plan. Calling now for "replacement" of this picnic area is not justified because this goal is not included in the Forest Plan, and the ZBA is not an area designated as appropriate for such development in the Plan. The proposed Day Use Area is located more than a mile distant from the original campground/picnic location and would hardly qualify as a replacement in any event. The proposed Day Use Area is a completely new development. The Forest Service has identified the specific areas appropriate for such development in its Forest Plan and they do not include the South Fork ZBA.

The only development I presently favor for South Fork would be improved toilet facilities, but not at the site suggested in the proposed development. I believe where toilet facilities are truly most beneficial is at the berm at the end of the road where a large fraction of South Fork visitors park and embark on hikes up the canyon. This is where the porta potties are presently located, for good reason. I find suggestions that improved toilet facilities cannot be provided at this location for geologic or flooding reasons to be unpersuasive. The area between the cabins and berm parking area is ample for such a structure and this area did not flood even during Hurricane Odile, as I know from personal inspection at that time. Perhaps current flood zone maps of the area need to be updated and improved.

In any event other federal agencies have found ways to provide flood-tolerant improved toilet facilities in official flood zones. These have apparently not been seriously considered here and should be. That toilet facilities might be removed from the berm area and moved to a whole new Day Use Area ignores the needs of the berm area and entails new habitat degradation that is neither needed nor beneficial. Toilet needs in the berm area are being met right now with the porta potties, and I believe even that is a satisfactory solution, though I would favor improvement of toilet facilities at this same location. Maintaining toilet facilities at this location can be expected to help ensure environmental quality of nearby areas of the ZBA which have traditionally been relatively heavy use areas..

More modest toilet needs near the entrance of South Fork are already met in part by toilet facilities in the nearby Sunny Flats and Stewart campgrounds, though additional facilities might reasonably be provided right at the junction of the South Fork Road with the main road up Cave Creek Canyon (FR42) to serve pedestrian users on the main road and at the very entrance to South Fork and motorists using the parking area at the entrance of South Fork. From a present needs standpoint it is very difficult to understand why a toilet

might be proposed several hundred yards farther up South Fork at the site of the proposed Day Use Area..

While at times in the past I've seen some merit in regulated closure of the South Fork road, mainly for dust reduction, I've come to believe strongly that overall it is not a good idea and will generate a tremendous amount of grief and opposition if actually implemented. Moreover, the main real benefits to be anticipated from closure can be better met by other means (see Remedies below). The closure of the South Fork road from March to June was evidently incorporated into the proposal largely as some sort of mitigation for putting the proposed Day Use Area immediately next to a Spotted Owl PAC, judging from comments of the District Ranger at the public meeting of July 26. But it cannot be expected to benefit Spotted Owls and will surely cause intense backlash in the user public of South Fork, as will be discussed in the next two paragraphs.

Most users of South Fork concentrate their activities around the bridge zone and at the berm area and partway up the trails farther up the canyon, because that is where favored species such as Elegant Trogons, Sulfur bellied Flycatchers, etc. are most reliably found. Use is heaviest at just the time of year proposed for a closure because it is the spring breeding season. But to get there during closure, users will all have to hike up from near the entrance of South Fork, something that will not even be possible for many elderly users who have traditionally enjoyed portions of South Fork near the end of the road. Many of the clientele of the many wildlife tours that visit South Fork, especially in April and May, and also many local users, are elderly persons incapable of long hikes. Even many younger users will be predictably displeased that they now have long hikes to get to places that were formerly much more accessible, especially when they may have only limited time for their visits.

At the present time, the great majority of South Fork users simply drive their vehicles up to the end of the road, passing through the Spotted Owl PAC without causing any known negative impacts on the owls. With closure of the road March through June we can expect to see a substantial increase in human foot traffic in the Spotted Owl PAC as people utilize the Day Use Area itself and are now obliged to hike up through the PAC to reach more favored areas farther up the canyon. This can be expected to result in increased habitat degradation of the PAC and increased potentials for harmful interactions of people with owls. I worry most about the habitat degradation that will be an intrinsic result of the Day Use Area proposal, not just in the area itself but in surrounding areas, as this happens around all such developed areas. It is these impacts that can be expected to be most harmful to the owls and will not be helped by a road closure that will result in far more people on foot in this area than formerly. I don't believe that low-speed vehicle traffic itself on the road is a significant threat to the owls or ever has been, and I'm not aware of any credible evidence that it ever has been.

The problems created by closure could be avoided by not placing a developed Day Use Area immediately adjacent to a Spotted Owl PAC, where it is not needed or beneficial in the first place. Evidently if no Day Use Area was created, no road closure would likely be proposed and this would avoid both harmful impacts on the owls and the opposition

that can be expected from the public because of effectively denied or newly troublesome access to favored areas.

This is not the first time the idea of closure of the South Fork Road has emerged. This was seriously proposed by the Forest Service several decades ago, but was rejected for reasons that still apply today. There was major public opposition to the earlier closure proposal, especially from elderly users of South Fork who rightly concluded they would no longer be able to get to their favored places in the canyon. I'm now an elderly user of South Fork and I am personally opposed to closure, in significant measure because during closure I will no longer be able to access many places I can still access and because the closure period is the exact time of year I normally enjoy these places. Yet I doubt strongly that closure will provide any significant benefits to wildlife in general, and this has not been clearly demonstrated. I'm also a retired wildlife biologist from the USFWS Endangered Wildlife Research Program and cannot imagine any coherent benefit for Spotted Owls to be gained by the Day Use Area, especially with road closure. It can only be expected to increase harm to this species by increasing interactions and negative impacts of increased numbers of people. The public has not been presented with a truly persuasive analysis justifying a need for a closure that recognizes the severe negative consequences of this action.

Finally, I am at a loss to understand why a Day Use Area development might be considered appropriate within a Zoological Botanical Area, and especially where it can be expected to impact a Spotted Owl PAC. It will clearly degrade the natural values of the area that are the main purpose of this ZBA, as identified in Forest Service documents. Quality bottomland riparian habitat is a limited resource in Cave Creek Canyon and needs very careful management. The Recovery Team of the Spotted Owl has recognized such habitat as especially important for the species. The proposed developed area is not greatly distant from the Sunny Flats Campground, and it seems clear that additional picnic facilities could be developed at that alternative location if there is an overwhelming need for additional picnic facilities, though I'm not aware of this need, and it is not demonstrated by highly flawed attendance figures at the VIC three or four miles distant. If there is such a need, it should be sited properly in the context of the entire Cave Creek Canyon complex, not assumed to be best met in South Fork.

People do not currently come to South Fork to picnic. They come there to enjoy wildlife. I believe this is appropriate and should continue to be favored by Forest Service policies, not changed into a policy aimed at general recreation activities in this location. Why establish a Zoological Botanical Area if the Forest Service is not going to defend it and favor it? I don't believe the South Fork proposal is consistent with overall policies of the Forest Service, as is well documented in the comments currently being submitted by the Chiricahua Regional Council.

REMEDIES: (1) I believe improved toilet facilities should be developed for South Fork, but the best location for this would be at the end of the road in the berm area where toilet facilities and nearby parking presently exist. To meet regulations, the Forest Service may need to reevaluate flood risks to the site in question or implement flood tolerant toilet

structures used by other federal agencies. I don't see any special need for toilet facilities in the location of the proposed Day Use Area and toilet development in this location would pose significant negative habitat degradation especially to provide nearby parking areas. A much stronger case for need and low impacts could be made for new toilet facilities at the junction of South Fork Road with Forest Road 42 which would not pose any substantial negative impacts on the ZBA. Nearby parking area for this location already exists (2) I believe the Day Use Area should not be built, and any functions proposed for this area such as a handicap access trail, amphitheater, and picnic facilities could be better sited elsewhere in Cave Creek Canyon, leaving maximal habitat protection of the South Fork ZBA. (3) I believe that the proposed closure of the South Fork Road will cause substantial access problems for many users and will be harmful to the Spotted Owl PAC because it will substantially increase, not decrease, human numbers in this location during the breeding season. Access problems created by closure could be partially, but only partially, addressed by granting vehicle access permits to the closure area for elderly and physically compromised individuals and perhaps some other user groups, but this will still leave access troublesome for many individuals, including those able to get permits. As a result, closure is likely to be highly unpopular. Moreover, real benefits that can be anticipated from road closure, such as reductions in road noise, road dust, and road hazards can be obtained much more preferably by other means that are not seasonally limited. Much preferable would be simply achieving very low vehicle speeds on the existing road by some means, for example, very low speed limits and increased speed enforcement measures. (4) I believe the Forest Plan should be followed in properly protecting ZBAs from unnecessary development. The Forest Service should err on the side of caution in protecting such valuable areas. They are a scarce and vulnerable resource greatly valued by the public.

Thanks for your attention to my concerns. It's my personal belief that the Forest Service would probably not have come up with this proposal if the Friends of Cave Creek had not offered the funding to make it possible. I don't think Forest Service management plans should be based on financial inducement from single outside organization that may be advancing agendas lacking broad public consensus, and I believe that the Friends of Cave Creek was mistaken in generating funds for a project that lacked such consensus support. I believe the Forest Service badly needs to generate new long term management plans for all of Cave Creek Canyon that integrate all appropriate user needs and recognize the special nature of areas that should be protected from development. In particular, special needs for the new Birds of Prey ZBA need to be much better defined as well as special needs of the South Fork ZBA.

Noel Snyder

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