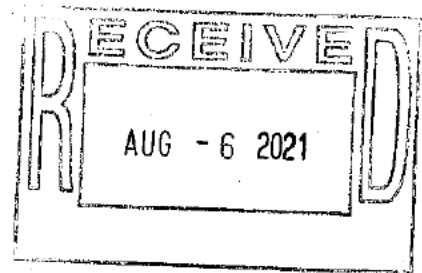


TO: Kerwin S. Dewberry, Forest Supervisor and Reviewing Officer

FR: Bob Downs [REDACTED]
[REDACTED]



This is an objection to the proposed South Fork Day Use Area Project as described in the Draft Decision Notice of Coronado National Forest, Douglas Ranger District and the Final Environmental Assessment (FEA) for the project publicized June 16, 2021 in the Herald/Review Cochise County edition.

I filed comments on this proposed project (NEPA #56779) and was noted as respondent #184. In my prior written comments, I questioned the accuracy of the statement that the proposed project was a replacement of facilities, there was insufficient evidence presented of the need for new facilities along with suggesting the need for an Environmental Impact Statement. Further, there was a lack of thorough consideration given to alternative means of achieving the project goals which seems to be in conflict with intent of the NEPA process.

I challenge the assessment in the Draft Decision based on the following issues:

The USFS is incorrectly asserting the South Fork Day Use Area project is a "replacement" of a facility rather than new construction in a new site.

In April 2018 the USFS issued a Forest Plan, CNF Land and Resource Management Plan MB-R3-05-15, which did not list a lack of facilities or identify a need for the replacement of facilities in South Fork. The proposed is not a "replacement" of facilities but new construction in an environmentally sensitive and previously undisturbed location.

The USFS has not provided substantial evidence that the project is necessary.

The FEA on 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 Cave Creek Canyon." The Draft Decision and FES state that South Fork has "high visitor use (with) the number of visitors continuing to increase annually." To substantiate this statement the USFS fails to provide evidence based on its own assessments and relies on data kept by the Friends of Cave Creek Canyon (FOCC) taken at the Visitor Center. There are a couple of issues with the use of this data. First, the Visitor Center is not in South Fork Canyon and lies approximately three miles away from South Fork on the main entrance to Cave Creek. How many visitors stop at the VC are counted and never visit South Fork? Second, the FOCC did not maintain fulltime hours at the VC for at least the first season of its operation of the VC so, to compare the numbers of visitors to subsequent years when the VC was operating fulltime reflects an inaccurate estimate of visitation numbers in Cave Creek.

No scientific data on water contamination to South Fork of Cave Creek as a result of human activity or evidence indicating that the existing portable toilets have been insufficient in addressing visitor needs was offered to establish the need for this proposed project.

The Forest Service did not accurately analyze using removable a porta-potty with wood surrounding wall as a potential facility at the berm.

In my original comments I provided a photograph and description of handicapped accessible portable toilet on a cement slab surrounded on three sides by natural wood enclosure that is used by the National Park Service in floodplain sites.

The original or Draft document purports to have analyzed the option of placing facilities at the berm. However, Alternative C reviewed the use of a vault toilet at the berm because it was in the floodplain. What I called for in my comments was consideration of a removable handicapped accessible portable toilet in the case of a potential highwater event, on a cement slab with wood surrounding walls.

This option was noted, but dismissed in the Final Environmental Assessment document: "In considering the issue of unsustainability of Portable toilet it was noted the port-a-potties are expensive to maintain long-term, blow over in windy conditions, and there is no place to locate these facilities outside of the 100-year floodplain. The current facilities are not accessible to visitors with mobility impairments."

Based on the above comments clearly the use of a portable toilet on a cement slab with wood surrounded sides was never considered. The reason for using this National Park Service design is so that the toilet being portable can be easily removed prior to the possibility of a highwater event and thus can be used in floodplains. The photograph I included in my comments clearly shows an ADA handicapped symbol on an accessible toilet contained within the surrounding walls. The purpose of the surrounding three walls is to prevent the possibility of the toilet from being knocked over by winds, animals, or humans, as well as providing an aesthetically pleasing screen of natural wood. An analysis of the expensive was obviously not done. I believe this option is less expensive or equivalent if one compares the substantially lower initial construction costs of a handicapped accessible portable toilet on a cement slab with a three-sided wood surrounding walls versus the excavation and construction a standard Forest Service vault toilet even with the greater frequency of pumping needed for a portable over the standard toilet.

Other Objections

I have read and endorse the objections being submitted by the Chiricahua Regional Council, Wynne Brown, President.