

DATE: July 30, 2021

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

FROM: Paul Hirt, [REDACTED]

RE: OBJECTION to South Fork Day Use Area FONSI and decision

I object to Douglas District Ranger Doug Ruppel's decision and FONSI for the South Fork Day Use Area. I provided extensive and specific comments on the draft EA. My name, P. Hirt, is listed as a commenter in the USFS document titled "Consideration of Comments for South Fork Day Use." My comments are identified in that document under acronym 84. The official USFS responses to several of my comments and requests for supporting information were incomplete or inadequate and in some cases incorrect. Therefore, I object to the decision to move forward with the proposed new South Fork Day Use area.

Below are excerpts from my original comments, followed by the FS response from agency staff and my reasons for objecting to those responses and the District Ranger's decision.

As stated in my original comments, the "purpose and need" for the project were neither empirically demonstrated nor adequately justified in the Draft EA as well as in the final decision. My original comments stated: "The 'need' for the specific proposal has not been credibly demonstrated. Many important claims about 'need' lack evidentiary support." There were references to "social trails" in the EA as a potential problem that the project would supposedly ameliorate. Yet no evidence was provided that social trails are in fact a problem along the road in South Fork, nor is there evidence that the proposed facility would ameliorate any existing social trails. Page 2 of the EA referred to "increasing visitation" in the canyon as part of the "need" for the project but the data supporting that claim comes from visitation numbers at the Visitor Information Center at the mouth of the canyon 4 miles away. That does not justify a need for a new facility specifically in South Fork at a location where no facilities currently exist. Another part of the justification for the project on p. 3 of the EA was to "Improve accessibility for all visitors through the addition of accessible restroom facilities, benches, tables, and a trail." But the proposed site is less than a half mile from existing accessible restroom facilities, tables, and parking spots at Sunny Flat campground. The wheelchair accessible trail has been dropped from the South Fork proposal. Therefore, the "need" for these facilities is yet again undemonstrated. There were additional flaws in the stated need for the project that I addressed in my comments. Many others besides myself commented on the inadequate justification of the need for the project, yet the official response from the District Ranger on p. 8 of the online [response to comments document](#) is the following: "The purpose and need as defined on pg. 2-3 of the draft EA states that this project is driven by the imbalance between visitor use and the level of services provided in the South Fork of Cave Creek Canyon. The geographic boundary of this project is the South Fork of Cave Creek Canyon. Alternatives proposed outside of the South Fork of Cave Creek Canyon were eliminated as they do not address the purpose and need of this project." There are two main problems here as I see it. (1) There was no empirical evidence offered to demonstrate an unacceptable imbalance between visitor use and level of services in South Fork.

There are no crowds, no conflicts, no evidence of serious resource damage, no body of complaints from the public about the lack of facilities. I would like to see the claims of need for the South Fork facility demonstrated with empirical evidence, not simply asserted or hypothetical or based on anecdotal impressions. (2) The FS claim quoted above from the [response to comments](#) that the “geographic boundary of this project is the South Fork of Cave Creek Canyon” is arbitrary. It serves only to dismiss the many public calls for siting the facilities in existing locations where visitor facilities and impacts already exist, such as Sunny Flat. When taken in context, the statement about the geographic boundary hardly even makes sense. When talking about increased visitation as part of the need for the project, the EA cites data for the visitor center 4 miles away from the South Fork. Supposedly that is relevant. The old picnic facility at the end of South Fork Rd that this project is supposed to “replace” is nearly a mile distant from the proposed facility, yet Sunny Flat campground is directly across the road from the mouth of South Fork close to where people currently park when walking South Fork. The other main location where users might need facilities in S. Fork is at the trailhead at the current berm, three-quarters of a mile distant from the proposed facility. So why is Sunny Flat or Cathedral Vista trailhead irrelevant to consider when they are in fact closer to where people currently park at the junction of South Fork than the proposed new facility will be? This rationale does not hold up under scrutiny. In summary, the project does not serve an existing demonstrated need in the location where it will be sited. Viable alternatives are available that the District Ranger improperly and arbitrarily dismissed.

Sincerely,



Paul Hirt

