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Comments: To: U.S. Forest Service

Regarding: Comments on South Fork Day Use Area: Draft Environmental Assessment

Recently the U.S. Forest Service published a Draft Environmental Assessment for a proposed South Fork Day Use Area in Cave Creek Canyon. I have been hearing mixed comments from various members of the community. Some members approve of the proposed development while others are adamantly opposed. Community members from both sides have asked me to submit comments on the Draft EA. I have read through the document and my comments will reference specific issues in the Draft EA.

1. Under the proposed action, a gate will be installed to seasonally (March 1-June 30) exclude vehicular traffic along South Fork Road beyond the day use development. I assume that the purpose of the road closure would be to provide some level of mitigation related to potential increased human activity and development at the day use area. However, this is not stated in the EA and no actual purpose for the road closure is described. I suspect that the proposed road closure would reduce the level of human activity in sensitive areas of South Fork Road that currently receive higher levels of use and thus provide significant mitigation. That is, road closure would require significantly more effort for visitors to reach the South Fork bridge, the berm, the original picnic area and the trail system beyond.

At the bottom of Page 5, the document indicates that the seasonal road closure dates may be subject to annual change. I did not, however, see any mention of how such changes might be determined, who would be able to make changes to the seasonal closure dates, or what the rationale might be to change closure dates (more on this later). I am concerned that the road closure might be initiated at project start up but later abandoned. The EA needs to clearly state who would be able to make changes to the road closure dates and under what circumstances closures might occur.

2. Page 7 indicates that Mexican Spotted Owl (MSO) surveys will be conducted prior to and after implementing the action. In my experience, MSOs seem to tolerate human activities reasonably well. I suspect that MSOs occupying the day use area after project completion would probably tolerate the development reasonably well. However, I do not see any mention of what action will be taken if MSOs are found using the project site prior to or during construction. For example, would construction be delayed if MSOs were reported within or adjacent to the project site?

3. Issue 1 on Page 10 suggests that the proposed alternative "could affect recreation resources and provide users with a wider range of recreation activities" and that the proposed facilities could increase the number of users in the canyon. It seems to me that the seasonal road closure might have the opposite effect by making it more difficult for visitors to access South Fork which is one of the biggest (if not the biggest) attraction to Cave Creek Canyon. I would argue that the proposed action could potentially narrow the range of recreation activities by making it more difficult to access parts of South Fork.

4. The first bullet point on Page 11 suggests that current parking availability at the end of South Fork Road is inadequate and results in people parking along the road when the lot is full. Later, on Page 13, the first bullet point says that "the proposed action would create a parking loop and defined parking spaces, and provide a place for large vehicles to turn around, which would increase visitor satisfaction." The Propose Action, however, will provide only 9 parking places which I suspect may be fewer than those available at the berm. The level of available parking would be further reduced by the road closure since vehicles could no longer park along the road. Other parking would be available at the junction of FRS 42 and South Fork Road, but it is not clear to me

that the parking situation would be improved by the proposed action. The sixth bullet point on Page 13 suggests that the number of parking spaces in the proposed action would be similar to that of the no action alternative. I think an argument can be made that available parking might be reduced by the proposed alternative compared to the no action alternative.

5. I assume that the purpose of parking places at the proposed day use area would be primarily for visitors who are using the toilet facilities or picnic tables, etc. Would these parking spaces also be available for folks planning a day hike further up the canyon? If so, I can see the possibility of these 9 parking sites being taken early in the day and thus unavailable for folks wanting to use the day use area.

6. The fourth bullet point on Page 12 suggests that the proposed border wall may result in decreased illegal activities. It also may not result in decreased illegal activities. Either way, the border wall is irrelevant when considering the issues of the current EA. This same statement occurs on Page 14 and these bullet points should be deleted.

7. On page 12, the second bullet point under Alternative B: Proposed Action says in part: "compared to pre-2014 recreation settings in South Fork, the proposed action moves the area toward the primitive end of the spectrum, which would benefit visitors who enjoy more primitive and quiet recreation opportunities." I agree that this will be the case along South Fork Road above the proposed day use area from March 1 through June 30 if the road closure remains in place. This will not be the case if the road closure is abandoned at some future date. The second line of the following bullet point should read as follows: the recreation setting beyond the gate would (rather than could) become a non-motorized area, at least during the period of road closure.

8. It is not clear to me how the proposed action might take some pressure off other sites in Cave Creek Canyon during the busy spring birdwatching season as stated in the seventh bullet point on Page 13.

9. I agree that adoption of the proposed action would make walking and birding on South Fork Road more pleasant due to lack of vehicles and associated dust during periods when the gate is closed, and that visitors wishing to access areas further up the canyon would be inconvenienced (bullet point eight on Page 13).

10. Regarding the road closure, I have heard some opposition and various suggested alternatives to a 4-month road closure including (1) abandoning the road closure, (2) reducing the closure time period to 2 months, (3) leaving the road open for seniors and handicapped, and (4) keeping the road open on certain days of the week and closed on other days during the closure period. Abandoning the road closure would eliminate whatever mitigation was intended by the closure and seems unacceptable under the current EA. Opening the road to seniors and handicapped would be good for me (I'm old) but discriminates against a younger family that want to hike with their kids to locations farther up canyon. Reducing the closure period or opening the road on certain days of the week might be options to consider.

11. Near the bottom of Page 23 the EA states that "most effects to wildlife and plants from past, present, and future activities are relatively minor and some are positive." What are the positive effects to wildlife and plants?

12. Fourth bullet point on Page 26 says that "additional facilities and better accessibility would likely attract more people throughout the year and visitors would be likely to spend more time in the ZBA." I assume that the better accessibility would be to the use area. Accessibility to South Fork in general would be reduced by the proposed action.

13. Regarding the proposed vault toilets, I have heard several people say that there is a need for a toilet in South Fork and that they would be OK with installation of just the toilets but not the rest of the day use area. It seems to me that if the vault toilets were installed it would also be necessary to have some sort of parking area.

14. Finally, I am not a hydrologist and was confused by Fig. 8 on Page 19. I assume that the area outlined in red is the proposed site for the day use area. (I'm not sure what the area outlined in blue represents.) If so, a fairly large portion of the area seems to be within the 100-year floodplain. This makes me question the suitability of the proposed site for development.

Thank you for the opportunity to comment on this draft.

Bob Rodrigues