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Organization:

Title:

Comments: Dear Ranger Ruppel and Planner Reynolds,

Thank you for the opportunity to comment on the Draft Environmental Assessment for the proposed development in South Fork.

As you may remember, I originally supported development of some facilities in South Fork, when they were located in already-disturbed habitat at the berm or at the road junction with FR-42. I cannot support the version of the plan given as Alternative B in the draft EA, and therefore must support the first option, NO ACTION, even though it is also deficient.

The Forest Service has done a great disservice to the public in offering only two alternatives: A--no action; or B--full-on development. In the past, most proposals contained several options: what has happened? You appear to be neglecting the full scope of your duty to the public.

Problems with the development plan:

Everyone I know agrees that a toilet is needed in South Fork. However, apparently there is no site above the floodplain, because even in the proposed development a pad must be built to raise the toilet above the level of the floodplain. So, what are alternatives? You could return the toilet to the berm (the most heavily-used area of the canyon), and put it on a pad high enough to get it out of the floodplain, without blasting any of the bordering rock walls. Alternatively, you could use the design implemented by the National Park Service, and install toilets which are removable and can be trucked out if fire or flood threatens. Note that we aren't likely to experience another storm like Odile within our lifetimes, and not even Odile flooded the two cabins (other than one outhouse closer to the creek) or the berm area. I know because I hiked up there right after the storm to survey the damage.

The proposed development is in the heart of a Mexican Spotted Owl PAC! (What are you thinking??) It is also located within intact riparian habitat and within two Zoological-Botanical Areas, and it proposes amenities such as a new 9-car parking lot that will fragment and degrade the canyon bottom in a previously-undisturbed site. A ZBA is a toothless, meaningless designation if the protections that it confers are so easily and summarily dismissed. Why aren't you doing a full Environmental Impact Statement?

Everyone I know agrees that the canyon (whether South Fork or the main canyon) needs a handicapped-accessible trail. But is this the site for it? The plan draws the trail almost entirely within the floodplain. Handicapped people generally aren't nimble, and I'm very surprised at the Forest Service's disregard for the safety of these folks and other walkers in proposing a trail that could subject them to a flash flood.

Having walked the road many, many times, I personally favor seasonal road closure, to encourage people to think of the road as a good, wide trail during the high season of mid-March through May. That period is when birders descend upon the canyon in the greatest numbers, and most don't realize that the birding is actually better along the road. However, I recognize that some people really do need access via car--cabin owners, seniors, and the handicapped or infirm--so would hope that the Forest Service would institute a "soft" closure. Close the gate but don't lock it; place a sign there specifying who has access; and simply use the honor system. See how that works. Some people will ignore the restriction, but many won't. Advantages to the closure include reduced traffic, better safety for people walking the road and wildlife crossing the road, greatly reduced dust, and less noise in the canyon. Thank you for including a closure in the plan.

Benches: I do favor placing benches at intervals along the South Fork road and one or two benches along the trail higher up. Benches allow people to quietly observe their surroundings, as well as to rest.

Picnic tables: Initially I favored putting 2-3 picnic tables in the already-disturbed area near the berm. However, the new site poses problems for picnic tables. In addition to further disturbance within the Spotted Owl PAC and ZBAs, I've learned that surface water remains longer at that spot than it does throughout most of the lower canyon. That water, combined with picnic tables, will inevitably attract larger crowds to a place needed by wildlife during the drier seasons. I suspect that the type of visitor usage in South Fork will change as a result, to something inimical to the ZBA values. Picnickers too often are disruptive, leave trash, and are prone to building fires.

I've heard the argument that clearing the site for development could act as a firebreak. While that may be true for a very slow-moving ground fire, it isn't at all true for the kind of fire we're more likely to have, with the high winds we often have, and, in fact, the possibility of human-started fires would be much greater in a developed Day Use Area.

Education: I commend the Friends of Cave Creek Canyon for the excellent job they are currently doing, in bringing small groups of local children into the canyon (including South Fork) for education in the area's unique values and in conservation. I hope that program continues to operate. However I don't support the construction of a staging area, or any other structure within South Fork for the purpose of education. Let the kids enjoy an exciting, discovery-filled outing in an area that's as wild as possible.

Day Use: I've heard of your opposition to shifting day use to Idlewild Campground, which has been closed for many months, and which was deemed an unsafe campground by the previous District Ranger. Please reconsider this option. The campground is not currently being used and already has a vault toilet, parking places, and other amenities needed for a Day Use Area. Day use is safer from flash floods than overnight camping. It features fine rockwork by the Civilian Conservation Corps, and therefore showcases some of our history. It's a perfect site for introducing school groups to the canyon. It even has a short nature trail connecting to Stewart Campground, and from there, to the nature trail between Sunny Flat and the Silver Peak trailhead. If you were to need it to house a fire crew, it could be temporarily closed to day use. Like the other campgrounds in the floodplain, it could also be closed if another Odile approaches--we have plenty of warning when a storm of that magnitude is coming. And you would have day use fees to partially replace fees lost from the retirement of a campground. Right now, and for months, you've received no fees at all from Idlewild.

Future funding to maintain the proposed development is precarious. Although FOCCC has committed to maintaining the area for 10 years, the draft EA states that the FS assumes no responsibility for paying for maintenance (estimated to be \$10,000 per year), and that the new development will be demolished if outside sources of money fail. Doesn't that rather undermine the entire plan? All that destruction and impact, and you may tear out the entire development?

Although the draft EA represents this development as a "replacement", it is new development, not a replacement, because the proposed site has never held visitor amenities.

The comment period of a month is too short. Our respected friend Reed Peters sent a newsletter to 2000 of his clients, urging them to vote for the project, but without stating the very valid reasons for opposing the project. If his clients comment, I suspect that the overall result of the comment process will be skewed, unless time is allowed for fully airing the pros and cons of the proposal.

Please reconsider this ill-conceived new development. Consider South Fork's fragile values, its biodiversity, and the special designations it has merited--not only as ZBAs, but also as a major part of the globally-important Chiricahua Important Bird Area; as an Outstanding Arizona Waters site; and as an "area of high connectivity" for

Jaguars (with Critical Habitat currently being litigated).

Let's find a better solution!

Narca Moore-Craig