Data Submitted (UTC 11): 9/22/2020 6:41:30 PM First name: Eskild Last name: Petersen Organization: Title: Comments: The draft EA is deeply flawed as it provides us with only 2 options - Plan A no action or Plan B develop the full proposal.

Plan A is clearly the better of two poor options. Here are my concerns:

Plan B is a near carbon copy of Plan C, the initial proposal of 7/31/19 that we were told at the 3/9/20 public meeting was irrelevant, and that we should pay no attention to. This statement by the USFS was misleading. Many thoughtful suggestions for making a new site with less impact were advocated in debates and in writing at that meeting. They were not addressed in the revised draft.

Plan B repeatedly uses the term "replacement," despite the fact that this is a new site with new facilities nearly 2 miles from the campground/day use area that was destroyed in the 2014 flooding. That campground was established in the 1930's, many years before the endangered species act was enacted in 1973 and would be unlikely to be permitted today. To use the term "replacement" is neither logical nor acceptable.

A full Environmental Impact Statement is called for, as the new 1-acre hardscape entity is located right in the middle of a PAC for the threatened Mexican Spotted Owl. This study is also essential as this is a ZBA and a special Birds of Prey ZBA. In addition, both Cave Creek and South Fork are protected as Outstanding Arizona Waters - a fact not addressed in the draft EA.

Hardscape placed in the middle of a forest does NOT teach children the value of a forest. Sitting on a bench does not enhance a child's understanding of the natural world.

As described and acknowledged in the Draft EA, Plan A and Plan B are BOTH unsustainable. Why then is USFS rejecting one and not the other? Further, if financing for maintenance of Plan B disappears, removal of new hardscape would be planned and thus complete the damage already created. The logic here appears to be someone else (FoCCC) has the money, so we should use it.

It is worthwhile noticing that NGO's like FoCCC come and go and there is no guarantee that FoCCC will be in existence in 5 or 10 years.

Unfortunately, Draft EA gives no alternatives. I support many of the amenities in Plan B but certainly not in the heart of an area protected for its pristine nature and biological value. Sunny Flat is about 0.35 miles away and has some of the amenities discussed. A broader review and a plan for the best use of the entire Cave Creek area is needed - what is present, how to use existing facilities and how can we intelligently add to existing facilities.

Plan B as proposed is neither healthy for South Fork, the Forest Service or for the community of Portal. If the Forest Service goes ahead with Plan B, the Forest Service will indeed be the cause of significant damage to both a valuable ecological community and also to the human community that has protected it.

There is surely a better way to attain a viable compromise that will accomplish the educational, mobility-impaired and sanitary objectives we all agree on.

## Eskild Petersen

PS The statements about the benefits of a border wall do not belong in an EA.