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Organization:

Title:

Comments: To: U.S. Forest Service, Coronado National Forest 9/23/20

Attn: Emily Reynolds, NEPA Planner re: South Fork Day Use Area Draft EA"

Dear U.S. Forest Service,

I don't believe the proposed action meets the needs of the general public or the natural resources in the Cave Creek area. The action will create a fifth recreation facility (each with restroom, parking, tables and trash cans) in a 2-mile length of riparian canyon. The closest existing facility is only ½ mile away! The proposed recreation site moves general recreational activities into an area identified by USFS as having exceptional natural resources. Multiple use doesn't mean every use should occur in every area.

The proposed site development map shows a single bear-proof trash can. Throughout the document trash cans are referred to as singular and plural. Please decide which. The other 4 rec. sites in Cave Creek have multiple trash cans. I suggest they be placed near picnic tables, the staging area and parking areas. Food waste will attract jays - as happened at the old picnic area. Jays are major predators on songbird eggs and nestlings. Food waste will also attract other animals such as skunks, raccoons and coati creating a human safety issue (rabies). In general, picnic facilities will create several other management problems (see below) that need to be addressed. I strongly oppose this portion of the project.

The USFS prohibits the use of recording equipment in the ZBA. The general public attracted to this proposed facility won't only be quiet birdwatchers. Some users will be playing their boom box, or car stereo during their lunch. How will kids and dogs get along with birding tour groups? How will the USFS respond to the conflicts with mixed uses of this site?

The plan states that the project is out of the 100 year flood plain. The proposed action states "placement of aggregate and fill to raise elevation of vault". Please explain the apparent contradiction....is it in the flood plain and needs to be raised or is it safely out?

The plan states that fill will be brought into the project area. My experience with brought-in fill is that weed seeds are brought in too. Will herbicides be used to control weeds? How will herbicides affect native plants in the ZBA? Would run off of chemicals affect the Unique Water designation? Could the material excavated for the vault toilet be used to raise the elevation instead of bringing in exotic soil?

I support the placement of benches at the parking and restroom areas and along the South Fork road. I was a member of the volunteer group that installed benches at the original picnic area at the end of the now destroyed road segment. The public really liked them. Too bad they were ripped out.

The short loop nature trail will be a disappointment much of the year. Flowing water in this stream reach has become a rare event due to changes in the channel bed composition and decreased rainfall. How wide is the buffer strip between the trail and the Creek bed? I have personally been involved with moving several long segments of the South Fork trail onto the side hill after floods destroyed the trail near the Creek. Please explain why the proposed Creek-side trail will survive when other segments are gone. When bank erosion occurs will the trail be protected by riprap or will it be moved up slope? Also, just what is "stabilized aggregate". If it is concrete or asphalt would it be in conflict with E.O. 11990 and 11988? There already are 2 nature trails in the lower part of Cave Creek. I have read that there are about 320 miles of USFS trails in the Chiricahua Mtns. Many of the existing trails are not being maintained so why is a new, vulnerable trail being proposed when the agency can't maintain what already is there?

The proposed gate across the road as shown in figure 3 has me interested. I would like to see a design, or a reference to a design that will allow access to hikers and wheelchair users while blocking ATV access when the road is closed. Also, my experience with the locked gate at Rustler Park makes me skeptical of this design. This spring I saw numerous ATV riders in civilian clothes driving the supposedly closed road. When I followed their tracks I could see where they drove around the north end of the cable barrier. I suggest you add "wings" on both

ends of the gate if you want to block vehicles March through June. Will Border Patrol personnel be blocked during the closed period or will they have keys as at Rustler Park? Would USFS volunteers repairing trail segments during the closed period be allowed to drive to the berm or will I be carrying my hard hat and tools the ¾th mile?

At several points the plan identifies dust creation as an issue. If a soil stabilizer is used what will be the impact to runoff from sealed soil surfaces? Will these chemicals wash into Cave Creek? If these chemicals enter the water table would they affect Portal residents with wells in the shallow aquifer?

The proposed action will result in a loss of riparian vegetation. Why is there no mitigation? The plan addresses the economic impact to FoCCC but not the cumulative impact of an additional recreation site. The abandoned road upstream of the berm is largely barren and unstable. If funds were available that large area could be replanted with native vegetation, which would capture silt (improving water quality), capture CO2 and provide wildlife habitat. If the now closed Idlewilde Campground was converted into a day-use area (already has restroom, parking, tables and trash bins) all that would be needed is "stabilized aggregate" on the existing social trails and a great site would be ready for the public! The American public's financial investment in the existing Idlewilde Campground would again provide public benefits. Since the site has been largely closed to camping since the 2014 flood it would again bring funding to the Coronado NF. Money saved could be spent repairing the damaged Canyon segment upstream of the berm (rather than clearing off more of it). If the objective is to have a picnic facility why not use the under-used nearby site? Or, is the objective to build a new facility and have a ribbon-cutting ceremony in the South Fork ZBA?

The proposal states that the development will benefit people with recreational vehicles because of the loop road. The map shows parking spots only for short vehicles. If a motor home or a truck pulling a trailer were to use the nice parking places it would block the road for everyone else. Why aren't longer vehicles provided a nice spot instead of needing to go park somewhere to be developed later?

The Coronado draft Land and Forest Resource Management Plan (2013) describes the socio-economic profile of the local area (pp 404-420).

Local residents are older (table 103), less educated (table 104), have a higher poverty rate (table 106), are more likely to be Hispanic or Latino (table 107), and have lower household incomes (table 108) than the U.S. as a whole. A quick review of surnames in the Portal vs Douglas phone books suggests these two communities have different ethnic populations. The current parking lot is free. Will charging a fee at the proposed facility have a different financial impact to visiting birdwatchers and Portal residents than to the residents of the other local communities?

I recently visited Rucker Canyon and saw the campgrounds and trails damaged by winter floods. This Canyon has permanent water and great birds (both elegant trogons and eared quetzals this year) yet little has been done to repair facilities for residents of nearby communities. Residents of Douglas and Pirtleville seem to be ignored while Portal gets another facility. Why the difference in USFS attention?

The draft 2013 Forest Plan identifies the acreage of riparian vegetation in Cave Creek canyon. What percentage of this scarce community has been cleared for roads, trails, campgrounds, parking lots and the visitor center. With GIS this figure should be easy to provide to the public. What is the cumulative impact of all the clearing on ZBA values? If this loss was mitigated by re-vegetating the road upstream of the berm, what would be the benefit to natural resources?

The proposed 4 month road closure will reduce human waste and trash at the berm March through June. But for the other 8 months there will be no facilities at the end of the road. Human waste and trash will again accumulate. While it could be suggested that people needing a toilet could travel the ¾th mile to the proposed facility; it could equally be proposed that people at the proposed facility travel the ½ mile to the toilet at Sunny Flat from March to June. This plan does not solve the problems at the berm most of the year (I'm reminded of a story I once heard about a coyote who'd chewed off 3 legs and was still caught in the trap). I strongly recommend the plan be modified to provide toilets and trash cans at the berm when the road is open.

The proposed plan discusses the economic impact to the FoCCC but I found no discussion of the impacts to the professional birding guides who are permitted by USFS. Why aren't anticipated impacts to the other publics with an economic interest given equal discussion?

I support the proposed seasonal closure of 0.75 miles of South Fork road. A walk or bike-ride along this road without vehicles and dust will be a new recreational experience. It is a beautiful stretch that most residents and visitors miss because they drive. As a frequent hiker up the trail into the Wilderness Area the extra distance simply means that on a day-hike I won't get as far during the spring closure. I still could backpack and get further in. (And, yes, at 73 I still backpack.)

As for my background; I'm a local resident with degrees in wildlife management and 30 years of federal land management experience. The last 24 years I specialized in riparian management issues. I'm a former member of FoCCC and served 2 years on the Board of Directors.

Thank you for your consideration of my input.

Albert R. Bammann