

Data Submitted (UTC 11): 9/26/2020 11:11:55 PM

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Comments:

Coronado National Forest

September 26, 2020

As one who has spent a dozen years working to keep the trails open system wide in the mountains and canyons of the Chiricahuas I've seen many changes to the south fork of Cave Creek Canyon. I've witnessed the assaults and dealt with the effects of fires (2010-2011) and the massive flood of 2014. The combination of these events has profoundly affected South Fork Canyon (SFC). Entire stretches, hundreds of yards long, have been covered in stone cobble due to the hurricane induced erosive flood waters of 2014. The net effect of these combined forces is a fragmented riparian zone in SFC as well as Cave Creek overall. Those areas most affected are the canyon bottom lands. My estimate is in the range of 35% of the bottom lands received significant damage. An aspect of this is the destruction of acres of plant communities. Large segments of canyon bottom soils were either swept away or buried beneath tons of rubble from debris flows washed down from the upland burn scars. An obvious consequence of that is the loss of productive forage for wildlife. What I'm arguing here is that the number of acres of riparian area in SFC, cited in the draft EA as 65 acres, fails to apply any qualitative analysis of the entire riparian zone of SFC when considering the impacts of siting the South Fork Day Use Facility. SFC's biotic communities will be impacted beyond the draft's estimate without better data on the entire condition of SFC. In other words, why further fragment a damaged creek system?

The aforementioned discussion of plant communities is one area to assess. Another is to look at the percentage of surface flowing water post 2014. The increased level of debris overlay has reduced surface flow overall in SFC. A breakdown of qualitative categories for surface flow might look like (but not limited to) this:

- 1) areas of severe debris flow (undercutting of banks and deep levels of cobble overlaying the former creek channel)
- 2) areas with no surface flowing water in dry periods
- 3) areas of reduced surface flow of water during dry periods
- 4) areas of moderate depths of cobble
- 5) areas of shallow depths of cobble

The point here is to offer an approach to assessing the canyon through the lens of a damaged ecosystem that is in the process of regeneration. The EA (or EIS) in its final form needs to take a more comprehensive look toward the overall health of the canyon bottom lands before concluding that the proposed South Fork Day Use Facility won't have significant negative impacts on the biotic communities of SFC. Again, my assertion in this comment is that the draft EA inadequately discusses the effects on the habitat from fire and floods. The same forces that led to the removal of the old bathroom also had a widespread negative impact on the biological resources in SFC.

Let's consider the location for Alternative B for a moment. Having visited this section of the creek many times and observed water flows during dry and wet periods both pre and post 2014, I've noted that surface flowing water remains active there even in dry periods. This is not true for other sections of the creek, some nearby, some farther away. I would point out that areas with surface flowing water are essential to wildlife in the canyon and the siting of the facility in a portion of the creek that attracts numerous animal species will have adverse impacts on those species beyond the draft's assessment. More study needs to occur to assess the qualitative conditions I've outlined above.

The other criticism I have of the draft EA is the inadequate development of alternatives. The premise of the original proposed action is one which everyone can find agreement: replace the bathroom facility destroyed in the flood. The growth of that action into the amenities proposed in Alternative B without offering a scaled down version (simply providing sanitation facilities) with the only alternative (A) being no action is myopic and could easily have been avoided. Not only is this a failure of the CNF's approach in presenting the proposal initially (and now with the draft EA) but it has sown division within the public unnecessarily. CNF should have anticipated

controversy over construction in as special a place as South Fork Canyon with its special designations and attributes (ZBA, MSO PAC, IBA, Outstanding Waters etc.)

One could say that this controversy is self-inflicted. The influence of one private organization (FoCCC) that helped fashion the proposal and has committed to raising funding for the project, has not established anything like consensus for the action. Furthermore the organization has a clear financial conflict of interest because of the composition of its board of directors, several of whom are business owners in Portal, the gateway community to Cave Creek Canyon. The discord that this proposed action has created is lamentable. Had a more open and inclusive approach been undertaken at the outset 18 months ago, the contention wouldn't have risen to where it is now. Further damage to the community of Portal can be avoided. If Alternative A is adopted, the need for for a bathroom in SFC remains and can still be accomplished. We need only sit down and work out a solution to siting that has the least amount of impact on South Fork Canyon, our treasured natural resource.

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