



November 23, 2020
U.S. Forest Service
Coronado National Forest
Douglas Ranger District
Attn: Doug Ruppel, District Ranger
1192 West Saddlevue Road
Douglas, AZ 85607

Submitted this date via the CARA website portal: <https://cara.ecosystem-management.org/Public//CommentInput?Project=57856>

Dear Mr. Ruppel,

Thank you for the opportunity to provide comments regarding the draft Chiricahua Public Access Environmental Assessment (EA). After careful review and discussion, the members of the Chiricahua Regional Council are supporting the No Action Alternative.

The primary goal of the CRC is to protect valuable intact habitats in the Chiricahua Ecosystem Management Area and private lands in this region. To accomplish this, we work with the Forest Service, other governmental agencies, and private entities on issues that impact our unique assemblage of habitats, which together comprise North America's greatest terrestrial biodiversity.

The Chiricahua Regional Council (CRC) is the only citizen-based organization in the Cave Creek Canyon area with the primary goal of conservation. We represent diverse interests ranging from ranchers and scientists to year-round and summer residence home owners, and ecotourism businesses.

While the Purpose of the EA is understandable, the explanation of Need does not hold up under scrutiny. Elsewhere in the EA, you indicate there are only three access points in the Chiricahua Mountains that are blocked. It turns out one of these is open and has been for years. This Ecosystem Management Area is in good shape in terms of access. Why not focus resources on some of the other 40-50 blocked routes in other parts of the Coronado National Forest?

The access locations are in three widely spaced areas, according to the EA on page eight. This makes a strong argument for doing each of them separately with their own analysis and own specific EA. If these areas are to be done collectively, the process should be completed as an Environmental Impact Statement.

The Forest Service proposes to revise the designation of a decommissioned route that was closed through the Travel Management Planning (TMP) in 2017. To reverse the Travel Management Plan this EA needs a higher degree of analysis of the impacts of this management decision. What changed in the intervening 2 1/2 years that would lead to this sudden reversal of a recent decision, with a much more thorough process that looked at cumulative effects and multiple user needs?

The statement that the public does not have legal access to John Long, North Fork of Pinery Canyon, Horseshoe Canyon areas for recreational and other purposes is incorrect. The EA repeatedly equates access with motorized access. Legal access is available to all of those areas currently. Our members have hiked in all three project areas recently. We can drive into Horseshoe Canyon as it's not closed, a fact confirmed by the EA. These issues were brought up in Scoping by several individuals, but this important point does not appear to have been considered in the preparation of the draft EA.

This leads to a larger question: Why are public funds being spent to create access when access currently exists? What is the cost of this project to taxpayers?

The EA indicates more than 40 Forest Service Sensitive Species located across the project areas. This is an extremely significant number. The general public might not realize this, but we do. We also know a preponderance of these Sensitive Species are found in John Long Canyon – allowing a 300-foot camping buffer on either side of the road would be counterproductive to controlling invasive species. This is a direct threat to the numerous Forest Service Sensitive Species found here. Additionally, motorized access greatly increases the risk of invasive species arriving on users' vehicles and clothing and increases the danger of fire, which is a significant spreader of invasive species as well.

Table 2: Spatial and temporal bounds of cumulative effects considered in the analysis, is incomplete. It does not list Peregrine Falcons that nest in the cliffs of John Long Canyon, nor does it address impacts to the Northern Goshawk, for which specific management guidelines exist. It does not identify any analysis done on impacts to the other 39 Sensitive Species found across the project area. Simply stating 40 Forest Service Sensitive Species exist across the project area is not an analysis of impacts. Each species needs to be identified and analyzed for negative impacts. Otherwise, the public does not have information needed to fully assess the project.

The EA fails to address the direct impacts of camping in John Long Canyon, which is an ecologically unique part of the Coronado National Forest. We know how busy the Rucker area is during the major hunting seasons. It is not an exaggeration to anticipate dozens of parties camped in John Long Canyon at any one time. This greatly increases the fire danger. The EA makes no mention of this.

The EA fails to identify the degradation in the quality of hunting opportunities with the opening of John Long Canyon to ATVs and camping. The EA also fails to mention that AZ Game and

Fish have a sign-in kiosk in John Long Canyon. **This is solid evidence that access currently exists for the hunting (and other) communities.**

Public motorized access to Horseshoe Canyon is not currently an issue, as one can drive into the canyon with no problems. As currently envisioned by the EA, there would be two open roads going to the same point on the forest, which would essentially double the impact to private citizens: They'd end up living with a road on either side of their houses. At the very least, the section of Road 314 from the forest boundary to the juncture of the new access point, should be eliminated. This will eliminate traffic down 314 and reduce the burden on private land owners in the area.

The Rural and Urban Development statement is misleading and is not an argument that supports moving forward with this project. Much of that growth is in the southern suburbs of the greater Phoenix area in Pinal County, whose population has grown by 591% since 1970. Also, the county in which these projects are occurring, Cochise County, has lost population over the past decade. Hidalgo County, close by and adjacent to Cochise County, has been losing population over an even longer time frame. Using Forest Service reasoning, if population is decreasing in the project area, there should be less of a demand.

We found of interest your statement that "illegal activity on the CNF continue to result in creation of unauthorized roads and trails, extensive trash and debris piles, and impacts public safety." Currently, we see this mostly with groups of ATV users, and we do not understand how opening new areas to this same set of users will not result in continuation of illegal activity, including unauthorized roads and trails, and extensive trash and debris piles, and the subsequent impact on public safety. The EA fails to address this community, which has a tremendous negative impact on the landscape, and in particular, on other user groups. Once an area becomes popular with the ATV user groups, other uses tend to stop, pushed out by the noise, accelerated erosion, and reduction in wildlife associated with ATV use areas. We can point to a number of areas on the Coronado National Forest where this has occurred.

The EA glosses over the important point of access bias. Most members of the public do not understand what Maintenance Level 2 means on the ground. If approved, this project will not open John Long Canyon to the general public for motorized access; motorized access will only be opened to those with sturdy four-wheel drive vehicles. We know from the Forest Service's own surveys that this represents less than 5% of the total visitors to the forest. This is a project for a very specific community of forest users, and would exclude forest visitors as a whole, as 95% of them will not be able to access John Long Canyon. The EA indicates public use of these areas is not expected to be heavy and admits that a road maintained at Maintenance Level 2 would not be inviting to many Forest visitors. This contradicts previous statements on providing access to the public. What the CNF is actually providing access to, is a subset of the hunting community and ATV users. The majority of the public will see no benefit at all from this project, and those seeking quiet recreation will be displaced from the area.

The Forest Service's expectation for visitor levels is the same as they were prior to closure. In the case of John Long Canyon, this was 34 years ago. Does the Forest Service have data on visitation during that time?

Also, this is in direct conflict with earlier statements in which the CNF indicated a need for additional access points due to a large growth in population. Which is it? Is visitation to John Long Canyon going to be as low as 34 years ago, or, will the rapid increase in population (one of the purported needs for this), lead to a heavy increase in visitation to John Long Canyon? In reality, there is no way to quantify this. Without data, the statements about visitation are meaningless.

Anyone who has been in the Rucker Canyon area during hunting season understands that John Long Canyon will likely be filled with dozens of parties at any one time during the more popular hunting seasons for bear and deer. This leads to a subsequent significant increase in fire danger, something the EA has failed to address.

“The lack of administrative access also results the (sic) Coronado National Forest being less able to efficiently maintain roads and hiking trails.” This is incorrect. Access cannot be denied to the Forest Service. We do not understand how this makes the Forest Service less efficient.

The EA discusses the spread of invasive species and indicates this spread could increase if public visitation increased. There are additional threats in the disturbed areas and adjacent to the road construction itself. The statement indicating the use of best management practices during construction would lower the impacts to acceptable levels is meaningless without being quantified. What is an acceptable level? Is it an increase of invasive species by 10 percent? Is it 30 percent? If there is an acceptable level for an increase in invasive species, the public needs to know what this number is. Otherwise, how can anyone assess the true impact from invasive species?

The following sentence is found in the No Action Alternative: “under this alternative there would be no new addition of roads to the system on the district, therefore there would continue to be high quality wildlife habitat and John Long Canyon and the North Fork of Pinery would continue to serve as a largely undisrupted potential corridor for wildlife.” The Forest Service is acknowledging that these are high-value areas for wildlife and wildlife linkages, yet appears to be willing to compromise these values for a very small subset of forest users.

The negative impacts of habitat degradation is particularly true when factoring climate change into the equation. Most of these wildlife and plant communities are currently stressed, and this stress will continue. Adding additional stressors in terms of large increases in visitors and the subsequent increase of invasive plants and fire danger, does not seem like a good way to address this issue.

The EA concedes this project may affect and is likely to adversely affect the Jaguar. *“The connected action of open public access to areas where it has not occurred since the Jaguar has resided in the Chiricahuas could result in activities that may harm or harass the Jaguar.”*

Due to the issues raised and discussed above, the Chiricahua Regional Council supports the No Action Alternative.

Again, thank you for the opportunity to comment.

Sincerely,

Wynne Brown

President, Chiricahua Regional Council