



June 21, 2018

Mr. Justin Thompson, District Fire Management Officer
Clifton Ranger District, Apache-Sitgreaves National Forest
397240 AZ 75, Duncan, AZ 85534

<https://cara.ecosystem-management.org/Public/CommentInput?project=50358>

Re: Greenlee County comments on the East Eagle/Mud Springs Fuels project.

Dear Mr. Thompson;

The Eastern Arizona Counties Organization (ECO) includes the Arizona counties of Apache, Cochise, Gila, Graham, Greenlee, and Navajo, that cover approximately a third of the State of Arizona. ECO has been a stakeholder in the efforts to develop and implement landscape scale forested ecosystems restoration; watersheds restoration; endangered and threatened fauna and flora protection; and, natural resources management for almost 30 years. ECO is actively involved as stakeholder, cooperating agency and coordinating local government in federal and state projects such as, among others, the Collaborative Forest Landscape Restoration Program (CFLRP); the Western Watershed Enhancement Partnership (WWEP); the Four Forest Restoration Initiative (4FRI); the Mexican Gray Wolf Recovery program; and, numerous state or local-scale natural resources management projects and natural resources-based economic development initiatives.

Thank you for the opportunity to comment on the 91,029 acres East Eagle/Mud Springs Fuels project on the Clifton Ranger District of the Apache-Sitgreaves National Forests (ASNF) bounded to the north by the Clifton and Alpine district boundary, to the east by Hwy 191, to the south by FR 515 (Pine Flat Rd), and to the west by the Clifton Ranger District boarder which follows along the San Carlos Apache Indian Reservation.

Support for the East Eagle/Mud Springs Fuels project

Greenlee County agrees with the ASNF assessment of existing conditions that the suppression of forest fires in the project area has altered the composition of vegetation species and the density of fuels throughout the project area; that Ecological conditions have diverged from what historically existed throughout the project area; and, that over half of project area has a Fire Regime Condition Class (FRCC) value of that indicates that conditions are “moderately to highly departed from historic reference conditions.”

Greenlee County further agrees with the desired conditions identified by the ASNF for the project:

- 1) Vegetation is resilient to the frequency, extent and severity of disturbances, consistent with conditions that occur under natural fire regimes;

- 2) Wildland fires maintain and enhance the ecosystem and its resources and, as nearly as possible, can function in their natural ecological role;
- 3) The composition, cover, structure, and mosaic of vegetative conditions reduce uncharacteristic wildfire hazard to local communities and forest ecosystems;
- 4) Natural processes and human and natural disturbances (e.g., wildland fires, mechanical vegetation treatments) provide the desired overall tree density, structure, species composition, volumes of coarse woody debris, and nutrient cycling;
- 5) The restoration of natural fire regimes achieves or moves towards a Fire Regime Condition Class (FRCC) 1 rating for the entire project area, where FRCC 1 represents conditions where fire regimes are within their historical range and the risk of losing key ecosystem components is low;
- 6) Vegetation attributes (species, composition, and structure) are intact and functioning within the historical range;
- 7) Uncharacteristic fire behavior is minimal or absent on the landscape; wildland fires burn within the range of frequency and intensity of natural fire regimes;
- 8) Natural ecological disturbances are returned to their characteristic roles within the ecosystems;
- 9) Uncharacteristic high severity fires rarely occur and do not burn at the landscape scale;
- 10) Wildfire that is restored to a more natural function;
- 11) Human life, property, and natural and cultural resources are protected within and adjacent to National Forest Service lands.

Therefore, Greenlee County supports the purpose and needs of the East Eagle/Mud Springs Fuels project to use prescribed fire, pretreatments and/or hand thinning in order to maintain and restore fire-adapted ecosystems to their natural fire regimes by reducing hazardous fuel accumulations and maintaining vegetation communities similar to their historic ecological conditions.

Concerns with the implementation of East Eagle/Mud Springs Fuels project

The action proposed by the ASNF identifies the use of prescribed fire and hand/mechanical pretreatments within the 91,016 acres project area, as well as mechanical and/or hand thinning of approximately 2,900 acres of the project area at two specific Wildland Urban Interface (WUI) locations: Pine Flat and Honeymoon.

While mechanical and/or hand thinning of approximately 2,900 acres of the project area at two specific Wildland Urban Interface (WUI) locations (Pine Flat and Honeymoon) is a given, Greenlee County certainly understands that due to distant location from wood utilization centers and the topography of the project (predominance of steep slopes), prescribed fire is the principal tool for the project, and Greenlee County approves of an incremental implementation of the project, as conditions permit, beginning in 2019 and, due to the large scale of the work, continuing for more than 10 years with approximately 5,000 to 20,000 acres treated per year.

However, Greenlee County is concerned that the current conditions and the continuous drought will make it difficult and risky to implement prescribed fires on 91,016 acres, especially if burn block sizes up to 20,000 acres are considered, and that the risk of inadvertently igniting a landscape-scale fire is real.

Greenlee County is particularly concerned that the Ponderosa Pine ecosystem in the approximate northern and Eastern half of the project, starting generally above 6,000 ft of elevation, and more specifically the northern third of the project above Sheep Saddle and generally above 7,000 ft of

elevation, is irreplaceable and likely to be not be regrown in the eventuality of a stand replacing large scale fire.

Greenlee County is therefore asking the ASNF to analyze and disclose in extensive details:

- the location and size of the burn blocks envisioned;
- the location and characteristics of fuel continuity strategic breaks to be implemented prior to prescribed fire;
- the location and characteristics of mechanical and/or hand thinning site preparation treatments required prior to prescribed fire, especially in the Ponderosa Pine belt.

Greenlee County is further asking the ASNF to complement the NEPA analysis with, and integrate in the NEPA decision a comprehensive and binding Implementation Plan that:

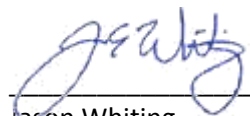
- defines specifically the implementation actions (e.g. location and specifications of the pre-fire preparation treatments, burn blocks size, risk mitigation measures, etc.);
- includes a full modeling of the sequential implementation of the fire treatments subsequent to the implementation of the pre-fire preparation treatments.

Greenlee County understands and appreciates that lighting techniques will vary based upon what Potential Natural Vegetation Types (PNVTs) is being burned, timing restrictions, specific weather and fire behavior parameters, and under appropriate burning conditions; that treatment with prescribed fire will generally consist of black-lining by hand (drip torch) and/or aerial ignition by plastic sphere dispenser to create a containment line (black line); that interior ignitions will pursue only after black lining is completed; that specific lighting techniques will be employed adjacent to riparian buffers to alleviate any concerns to threatened and endangered species as well as wildlife concerns; that broadcast and pile burning will be utilized where necessary to reduce fuel loading, promote understory plant vigor, and bring the PNVT that is being treated back or closer to the natural fire regime and desired condition; and, that, in general, all appropriate precautions will be taken to prevent the prescribed fire treatments to evolve accidentally into a landscape-scale uncharacteristic crown fire.

Nonetheless, Greenlee County urges the ASNF to be particularly thorough in the site preparation work required by prescribed fire treatments, such as for example: hand thinning and pruning, slash rearrangement, snag removal, and control and containment lines construction, and to be particularly rigorous in the implementation of the prescribed fire treatments as an accidental ignition of a stand-replacing fire in the project area would have catastrophic consequences for the culture, identity and recreation economy of Greenlee County.

Thank you for your consideration.

Respectfully submitted,



Jason Whiting
Supervisor, Navajo County
Chairman, Eastern Arizona Counties Organization



Richard Lunt
Supervisor, Greenlee County
Vice-Chairman, Eastern Arizona Counties Organization