



# WILDERNESS WATCH

*Keeping Wilderness Wild*

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September 4, 2020

Safford Ranger District  
Attn: George Garcia, District Ranger  
711 14th Avenue, Suite D  
Safford, AZ 85546

Re: Pinaleño FireScape Project

Sent Via The CARA Website

Dear Ranger Garcia:

The following are comments from Wilderness Watch on the scoping letter for the Pinaleño FireScape Project. This includes the Mount Graham Wilderness Study Area (WSA) and adjacent lands. Wilderness Watch is a national nonprofit wilderness conservation organization dedicated to the protection and proper stewardship of the National Wilderness Preservation System. As such, we are very interested in the congressionally designated Mt. Graham WSA.

## Wilderness Protection

This project could allow extensive manipulation and trammeling of the Mount Graham WSA that violate the Wilderness Act and the Arizona Wilderness Act of 1984. Our organization supports allowing lightning-caused fire to play its natural role in the Wildernesses and WSAs but the Forest Service plan proposes to significantly manipulate the Wilderness in ways that will destroy the area's wilderness character.

Specifically, the Arizona Wilderness Act of 1984 designated the Mount Graham Wilderness Study Area. That Act mandates it shall be "administered by the Secretary so as to maintain [the area's] presently existing wilderness character and potential for inclusion in the National Wilderness Preservation System."<sup>1</sup> The scoping letter admits and

<sup>1</sup> Aside from being subject to valid existing rights, the protections in section 102(b) of the Arizona Wilderness Act of 1984 do not include all the exceptions to protection that appear in the Wilderness Act itself.

associated maps show the WSA is a major part, nearly 1/3<sup>rd</sup> of the 198,900-acre project area.

Section 2(c) of the Wilderness Act defines “Wilderness” as:

A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

Congress was clear through the Section 2(a) “Statement of Policy” that Wilderness “shall be administered for the use and enjoyment of the American people in such a manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character...” Pursuant to Section 4(b), “each agency administering any area designated as wilderness shall be responsible for preserving the wilderness character of the area and shall so administer such areas for such other purposes for which it may have been established as also to preserve its wilderness character.”

Section 4(c) of the Wilderness Act prohibits certain uses of and activities within wilderness because these uses are activities that degrade wilderness. In order to meet the mandates of the Wilderness Act and Arizona Wilderness Act of 1984, the NEPA document must include an evaluation of the wilderness character of the Mount Graham WSA as of 1984 to determine whether the proposed actions will “maintain” the then-existing wilderness character of the area. This analysis needs to avoid the pitfall where the agency trades off wilderness attributes against each other, turning the substance of the Wilderness Act into a mere procedural check box. The fundamental tenet of wilderness stewardship was reiterated in a program review initiated by the four federal agencies and conducted by the Pinchot Institute for Conservation in 2001. The purpose of the study was to examine the critical management issues facing Wilderness. One of the eight “fundamental principles” for stewardship emphasized the need to preserve the wildness in Wilderness. As the Pinchot report stated, “Protection of the natural wild, where nature is not controlled, is critical in ensuring that a place is wilderness... Since wild is a fundamental characteristic of wilderness that is not attainable elsewhere, if there is a choice between emphasizing naturalness and wildness, stewards should err on the side of wildness.”<sup>2</sup>

The 2018 Forest Plan itself provides direction for the administration of the Mount Graham WSA. What is particularly telling, and supports our contention that allowing natural processes to function in Wilderness is key, is the statement in the desired conditions for WSAs on the Coronado National Forest, “Ecological disturbance processes such as fire, insects, and disease are the primary factors affecting landscape patterns in wilderness study areas.”

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<sup>2</sup> The attached documents, including the report cited above, critique recent agency efforts to evade the substance of the Wilderness Act by engaging in all sorts of trammeling actions in the name of “naturalness”—a word that does not appear in the Wilderness Act.

Even if various of the proposed manipulations may bring some perceived ecological or species-specific benefits, it is a significant trammeling of the area. However, agency manipulation can't begin to mimic natural fire in several key ways (extent, seasonality, severity, frequency, etc.). The Forest Service's plans could potential turn the Mount Graham WSA from a wild place into a heavily manipulated, managed forests. Allowing the area to evolve of its own accord and letting lightning-caused fire play its natural role in the WSA should be the goals. What is more unnatural or more trammeling than machines—chainsaws helicopters—cutting or logging inside the WSA?

The scoping letter provides no clear explanation for why this active manipulation, and the accompanying prohibited activities, are necessary to administer the Mount Graham WSA probably because there is no concrete proposal for treatment within the WSA. We would encourage the Forest Service to omit trammeling actions from the proposed action and include such an alternative in the EA.

## **NEPA**

Will this be a programmatic EA or site-specific? The lack of detail and the size of the proposal almost preclude site-specific analysis.

Alternatives should be analyzed that does no trammel or alter the Mount Graham WSA. Obviously, this would exclude mechanization and motorization from the WSA.

In the subheadings below, we address some concepts supported by science, that call into question some of the apparent assumptions in the scoping letter:

### Large wildfires are climate driven/fuel reductions have questionable results

There is considerable research that supports the contention large fires are climatically driven and fuel reductions do not work. For example see Forest Service research on the Fourmile Fire in Colorado. That abstract notes, “Fuel treatments had previously been applied to several areas within the fire perimeter to modify fire behavior and/or burn severity if a wildfire was to occur. However, the fuel treatments had minimal impact in affecting how the fire burned or the damage it caused.” (See attached). Another study that questions the assumption that fuel treatments will be effective in reducing large wildfires (see attached) numerous other studies also support that view.

### Trees that are killed by insects don't increase fire hazard

Beetle killed trees are less of a fire hazard than green trees in dry conditions, once the needles fall off. The presence of beetle kill has little do with the fire spread. (See attached.)

### Most fires are not out of the natural range

Significant recent research suggests that the effects of fire suppression have been overstated. In other words, many forests are not out of whack as the scoping letters suggest. This is especially true for all forests outside of the lowest elevation dry forest of ponderosa pine, and even may include ponderosa pine and Douglas fir. Please see the attached articles on this issue directed at lower elevation forests. (See attached).

### The Wildland Urban Interface

The best way to deal with protecting homes is through policies like installation of fire resistant roofing material and removal of flammable materials away from homes. Research suggests this is the most effective way to prevent loss of structures.

### **Summary**

Please keep us updated on this project via US Mail.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Macfarlane".

Gary Macfarlane  
Board Member  
Wilderness Watch  
PO Box 9175  
Missoula, MT 59807