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**Western
Watersheds
Project**

Working to protect and restore Western Watersheds and Wildlife

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,

The following comments on the Chiricahua Public Access Draft Environmental Assessment (EA) are being submitted by and on behalf of the members of Western Watersheds Project (WWP) who are concerned with the management of our public lands throughout the southwest, and specifically on the Coronado National Forest in the Douglas Ranger District and specifically in the project area. As you are likely aware, WWP has a heavy focus on issues related to livestock grazing. We have asked to be included on the project contact lists for all projects related to livestock use in the Coronado National Forest. Unfortunately, we were not aware of the connection this roads project has to livestock grazing during the scoping period and therefore did not comment. However, our review of the Draft EA makes it clear that livestock use of public lands may be a primary driver for this project and we have therefore carefully reviewed the Draft EA.

WWP appreciates this opportunity to provide comments on this project because of the ecological importance of the area, and we note that the Forest Service has inappropriately dismissed the impacts of the project on livestock via displacement, which will have significant impacts on wildlife and vegetation. More than forty Forest Service sensitive species are located within the project area. 2020 EA at 8. Most of these Sensitive Species are found in John Long Canyon, yet the Forest Service is forging ahead with an ecologically irresponsible plan to allow a 300-foot camping buffer on either side of a road without adequate analysis of the potential impacts to these important species. The Forest Service's late disclosure of the impacts of livestock displacement that will occur as a result of this

project, as well as the proposed livestock infrastructure (cattle guards and gates),¹ does not absolve the Forest Service from conducting a thorough analysis of those impacts.

The Forest Service states that motorized public access does not currently exist to John Long Canyon and North Fork of Pinery Canyon and that providing this access via dedicated, well-engineered motorized routes will increase public use which will, in turn, displace livestock grazing patterns.² 2020 EA at 15. The Forest Service minimizes the impacts of this displacement and frames it as a positive:

Since the current road systems accessing the John Long Canyon and North Fork of Pinery Canyon areas do not currently allow for the public to access these areas with motorized vehicles (Horseshoe Canyon does currently have public motorized access, though it is not considered “legal” as there is no easement across the adjacent private land there), providing dedicated, well-engineered routes most likely will increase the public use of these areas. Therefore, more public visitation may also inadvertently lead to changes in current livestock grazing patterns and increase the potential for concentration areas by livestock.

With such a relatively small portion of the much larger pastures being visited by vehicles, however, the effects of livestock displacement or disturbance would most likely go un-noticed. If livestock were displaced by vehicles, it may prove to have a positive effect on livestock distribution, as the roads are in the bottoms of the canyons and might encourage cattle to distribute across the adjacent uplands more readily instead of loafing in the canyon bottoms.

Id. This analysis fails to consider how a wider distribution of livestock will impact wildlife and native plants. The possible increase in livestock concentration areas is likely to lead to significant vegetation removal by those livestock as well as trampling, erosion, impacts to cultural objects, and negative impacts to recreational users. How will this increased distribution of livestock impact the spread of non-native invasive species of plants? Why were these issues not disclosed nor analyzed?

This project seems to be a solution for a problem that does not exist. WWP has information that the public access in the project area is not actually blocked and that the Forest Service may be proceeding with this project on the basis of misinformation. At least one of the proposed routes is actually accessible by the public. There are many other areas in the Chiricahua EMA that have dozens of blocked routes *and* that occur in less ecological important habitat. We strongly urge the Forest Service to redirect its resources to these areas. 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 continuously equates access with motorized access. Legal access is currently available to all of these areas. Hiking access is available in all three areas and vehicle access into Horseshoe Canyon is available.

¹ Page 2 of the August 3, 2020 scoping letter indicates only that “range improvements” will be protected and offers an example that if a fence is damaged during construction of a route it would be repaired or replaced.

² WWP appreciates the fact that the Forest Service acknowledges the fact that motorized uses displace livestock, but we would like similar analysis of species-specific and location-specific displacement for all wildlife species in the area not only from increased access and public use, but also from the displaced livestock.

The proposed action would result in two open roads going to the same point on the forest, which has the effect of doubling the impact to the owners of the inholding - these landowners who would end up living between these two roads, with a road on either side of their houses. WWP recommends the section of FS 314 from the forest boundary to the juncture of the new access point be eliminated which will eliminate traffic down 314 and reduce the impact on private land owners in the area.

The proposed action will revise the designation of a decommissioned route that was closed through the Travel Management Planning process (TMP) in 2017. The EA for this project does not describe what has changed in the intervening two and a half years that would lead to this sudden reversal of a recent decision that involved an extremely high level of public input and participation in a much more robust planning process. The changes between 2017 and 2020 must be more fully described in the analysis before the Forest Service can proceed with a Finding of No Significant Impact.

The information regarding species in the project area is inaccurate, in violation of the National Environmental Policy Act and National Forest Management Act's requirements that federal land managers use the best available and accurate information. For example, *Table 2: Spatial and temporal bounds of cumulative effects considered in the analysis* is incomplete. 2020 EA at 8. This table does not list Peregrine falcons which 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. This is especially important in light of the Forest Service's acknowledgment that the proposed new motorized routes will displace livestock, possibly throughout the project area and beyond. 2020 EA at 15.

In the analysis of impacts to the watershed the Forest Service speculates that only a slight increase in sedimentation would occur, and this would subside within a year. 2020 EA at 9. However, this analysis ignores the admitted and likely wider distribution of livestock (that is notably not quantified in terms of AUMs or number of livestock) to the watershed. The analysis is speculative, non-quantified, and therefore, invalid and cannot be used for a Finding of No Significant Impact.

The EA glosses over the issue of access bias. Most members of the public do not understand what "Maintenance Level 2" means in terms of actual on the ground vehicle accessibility. If approved, this project will not open John Long Canyon to the general public for motorized access – rather, motorized access will only be provided to those with high clearance four-wheel drive vehicles. The Forest Service's own surveys indicate this represents less than five percent of the total visitors to the forest. This is a project for a very specific and tiny portion of community of forest users, and does nothing to improve access for 95 percent of the people who visit and care about this ranger district. The EA indicates the Forest Service recognizes this point: public use of these areas is not expected to be heavy and road maintained at Maintenance Level 2 would not be inviting to many forest visitors. 2020 EA at 13. This contradicts the purpose and need, and indeed even the title of the project which is, in theory to provide access to the public. The vast majority of the public will see no benefit at all from this project, and those seeking quiet recreation will be displaced from the area by motorized users *and* livestock.

The Forest Service misstates a point regarding administrative access: "The lack of administrative access also results the (sic) Coronado National Forest being less able to efficiently maintain roads and

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hiking trails." 2020 EA at 13. As the Forest Service well knows, access cannot be denied to the Forest Service.

WWP encourages the Forest Service to revisit the purpose and need for this project, to analyze the impacts from displaced livestock that will result from route construction and increased visitation, and we strongly encourage the Forest Service to protect this high quality wildlife habitat which is home to native species of wild cats such as the jaguar, which are currently being significantly negatively impacted by border wall construction and related construction and border militarization activities. This is especially important in light of climate change. Most wildlife and plant communities in the project area are deeply stressed and this stress will continue. Adding additional stressors in terms of large increases in visitors, habitat fragmentation, and increase impacts from livestock will exacerbate the problems related to climate change and are likely to be in violation of the Forest's obligations under NFMA.

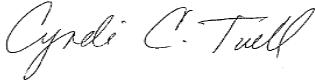
The EA indicates this project may affect and likely to adversely affect the Jaguar. *"The connected action of open public access to areas where it has not occurred since the Jaguar has resided in the Chiricahua could result in activities that may harm or harass the Jaguar."* 2020 EA at 18. What is unclear is whether the Forest Service has consulted with the U.S. Fish and Wildlife Service regarding these proposed negative impacts. Further, the Forest Service has failed to acknowledge how the displacement of livestock will impact jaguar. This oversight must be corrected.

Where the National Forest Management Act requires that goals and objectives for public lands be established by law as guidelines for public land use planning, and that management is on the basis of multiple use and sustained yield, it must do so while complying with other federal regulations. 16 U.S.C. 1600 *et seq.* And "multiple use" is specifically defined in the Multiple Use and Sustained Yield Act as, in part, "making the most judicious use of the land for some or all of these resources...the use of some land for less than all of the resources... with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." 16 U.S.C. §531(a). Simply because the overarching land management plan describes these allotments as "available" for a certain use doesn't preclude the agency from taking a hard look at the balance of uses at the site-specific level.

Therefore, we encourage the Forest Service to revise the existing environmental analysis to correct the deficiencies we have identified above. Clearly, as we have explained above there are many reasons that a Finding of No Significant Impact are inappropriate.

Finally, we request that all information used as part of the decision-making process for this project be posted online in a publicly available manner, preferably on a website that allows open access for all members of the public during all comment and objection periods for this project. WWP appreciates the opportunity to submit these comments and we request that the Forest Service ensure that our comments are incorporated into the project record and that we are included on the project contact list.

Thank you,



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