



NATIONAL WILD TURKEY FEDERATION, NWTF

Huachuca Gould's Chapter, P.O. Box 1257, Hereford, AZ 85615

May 30, 2023

Doug Ruppel
c/o Mindi Lehew
Coronado National Forest
300 West Congress Street Tucson, AZ 85701

Dear Doug Ruppel,

The Huachuca Gould's Chapter of the National Wild Turkey Federation appreciates the opportunity to comment on the Peloncillo Firescape Project. At this stage we are offering input that would be used to modify the proposed action and develop alternatives in a draft environment analysis.

General Comments

The overall scope and intent of the Peloncillo Firescape proposal appears well thought out and covers a large area. We hope that the draft environmental analysis will offer more detailed descriptions of treatment practices as related to wildlife habitat needs, especially those of the Gould's Turkey. The fire plan along with long-term maintenance cycles will greatly aid in establishing a mosaic of habitat types important to wildlife and establish a healthy forest benefiting environmental concerns.

The Forest Service portion of the Peloncillo Mountains is important to management and public enjoyment of the newly established Gould's turkey population, especially in accessible areas in both Arizona and New Mexico. Identifying important habitat areas and components for Gould's turkey and other Keystone wildlife species will be important throughout this process and in developing fire related prescriptions.

Specific Comments on Proposed Action

Management Direction, Page 4, Figure 1, Map of Ecological Response Units- at the presented scale and detail, it is difficult to locate important turkey roost sites within an associated mapped vegetation. There is probably some overlap between Madrean Encinal Woodland and Madrean Pinyon-Oak Woodland on the ground making any exact boundary difficult as well. Probably

more important is delineating important roost, nesting, loafing and mast stands, whether in canyon bottoms or uplands, and other habitat requirements for Gould's Turkey. This delineation should be part of the analysis for the proposed action and any alternatives developed.

Could the individual planning maps be displayed with Ecological Response Unit overlays for better understanding of the distribution of vegetative units?

Purpose and Need, Page 5- habitat requirements for Gould's Turkey and Bighorn Sheep (if appropriate) should be added to the list. The addition of Gould's Turkey, while stressing only one species, highlights the importance of the Peloncillo population for New Mexico and to a lesser extent Arizona. Habitat needs of other species beyond threatened, endangered, and sensitive species are important as well.

Proposed Action, Description of Proposed Treatments, Pages 8-11- overall, good treatment strategies are offered. The Forest Plan, though, is referenced for objectives and desired conditions in the Ecological Response Units. These objectives and conditions should be summarized in the body of the Proposed Action without having to read the Forest Plan. For example, what is the desired canopy cover and age class distribution for Chihuahua/Apache Pine and the larger Mexican oak species in the Madrean Pinyon-Oak Woodland and Encinal Woodland? Both are important as existing and potential roost sites for Gould's Turkey. Are the silvics of these tree species well understood? Is more research needed? Additionally, any proposed fire prescriptions should not only reference the Forest Plan but should look at current conditions to identify important wildlife species and develop prescriptions to enhance and protect essential habitat requirements.

Wildland Fire Treatments, Prescribed Fire, Pile Burning, Page 8- Prior to hand thinning, developing a plan for where piles will be located should be a part of the overall prescription. Identifying key wildlife habitat needs and trees, such as turkey roost trees and sites, will minimize the loss through scorching or killing this key habitat component for turkeys. Additionally, protecting roost sites outside of thinning areas prior to prescribed fire through selective thinning of shrubs or woody material that would result in ladder fuels is an important consideration.

Prescribed Cutting, Page 9- as noted the stand-level desired conditions would be determined on a site-specific basis based on silvicultural prescriptions. This especially applies to the Hand Thinning treatment. While site-specific planning is usually needed, what are the overall desired stand conditions of important roost tree stands for turkeys, especially Chihuahua/Apache Pine and larger Mexican oak species? Can these be stated without having to refer to the Forest Plan or other publications? Identifying and mapping locations of these is recommended prior to developing and initiating burns.

Mechanical Treatment, Page 9- How successful were past mastication and grubbing projects in the planning units. What follow-up treatment was used? How will this information be incorporated into prescriptions and individual treatment areas?

Watershed Improvement, Planting and Seeding, Page 11- please verify that Apache Pine, Arizona Cypress, and (Arizona?) Alder grow naturally in the planning units.

In closing, I compliment the Douglas Ranger District on pursuing vegetative management on a large scale such as displayed in the Peloncillo Firescape project. The Huachuca Gould's Chapter looks forward to commenting on a draft environmental analysis that includes any alternatives and modifications to the proposed action before project implementation.

Our Chapter is willing to work with you and your staff in the development of site-specific treatments that benefit Gould's Turkey habitat. That involvement should include the wildlife agencies of Arizona and New Mexico and the New Mexico State and local, interested Chapters of the National Wild Turkey Federation.

Sincerely,



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