

The Family Lands Limited Partnership
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June 9, 2023

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

Dear Mr. Ruppel,

We have reviewed the Scoping documents for the Peloncillo FireScape project and provide our comments on this proposal below.

Scoping is a tool used by federal agencies to solicit information from the public, tribes, and other federal, state, and local agencies, to inform the preparation and analysis in a decision document. Though not required for the preparation of an EA, once the decision is made to “Scope” a project, there are procedures that must be followed. The deciding officer cannot move directly for the Scoping phase to the Final Decision phase without further analysis and disclosure of impacts.

Under **Decisions to be Made**, you appear to be contemplating such a move, despite a lack of tangible information within the Scoping document. This is in contradiction of the initial paragraph of the Scoping document, which contains the following language: *“The Douglas Ranger District is currently preparing an environmental analysis of this proposal and seeks your assistance to better identify issues, concerns, and opportunities.”*

We have the following questions:

What are impacts of fire management and restoration actions on threatened and endangered species, such as but not limited to, the New Mexico ridged-nose rattlesnake, Gould’s turkey, and Chiricahua leopard frogs. Have you reviewed planning and protection documents for these species, while considering where and how species might be impacted? What measures will you take to ensure that negative impacts are limited? The state of New Mexico delisted the Gould’s turkey in 2022, removing state level protections, including those for nesting and roosting sites. How does this action factor into the Peloncillo FireScape project?

We are not opposed to limited herbicide use but this tool should only be used if no other options exist. What are the parameters for use on this project? What are the target species? What are the potential negative effects on non-target species? What are the effects on aquatic species? What are the effects on avian species (listed and migratory), whose foraging targets are contaminated by herbicides?

What are negative short and long-term effects caused by mechanical treatment? What vegetation species are you targeting?

The section on **Prescribe Cutting** is vague in details. No information has been provided here beyond definitions.

What are the Stand-level desired conditions? What are desired post-treatment conditions such as species composition, size class distribution, stand structure, and stocking levels? In reading this document it appears that you do not have these answers yet, as this document fails to disclose any such information. What are the potential negative impacts of this specific action? This information should be included in an Environmental Analysis, which thoroughly examines impacts, both positive and negative.

We support many of the management tools identified in the Scoping Document. The use of natural and prescribed fire in our region goes back several decades with quantifiable success. Are previous recent fires identified in this Scoping document incorporated into the planning for the Peloncillo FireScape project? If so, how?

Purpose and Need: While we support the overarching goals identified here, nothing found within the rest of the document provides details on how we get from here to there. The Proposed Action is lacking in details of the how and the where, and exists as a listing of potential management activities.

Please identify locations where desired conditions occur now, related to fuel loading, vegetation composition, and structure. Having tangible examples of healthy ecosystems will be valuable to the public's understanding of what on-the-ground conditions the forest service is attempting to achieve.

Please define "fire management opportunities" as stated in this section. What does this look like in practice?

The following statement "provide protection to values at risk within the project area, including, but not limited to, cultural heritage resources; threatened, endangered, and sensitive species habitat; wetlands and other natural water sources; USFS infrastructure; and adjacent private ranch infrastructure," sounds like what should be happening but has no detail as to how this will be carried out. When firefighters are suppressing fires they generally have a ranking system that

determines priorities for protection. In most cases human structures rank above threatened and endangered species, which rank above cultural and historic resources.

In terms of the resources listed above (cultural heritage resources; threatened, endangered, and sensitive species habitat; wetlands and other natural water sources; USFS infrastructure; and adjacent private ranch infrastructure), which would have the highest priority for protection and which the lowest? How will tradeoffs be identified, and choices made? We support protection priorities based on the order in which they are listed in the Scoping document, as opposed to traditional forest service's rankings, and would like to see this identified and prescribed in the final Environmental Analysis. We would also like to see analyses of actions that could protect multiple resources at once, rather than sacrificing some for the benefits of others. This cannot be done without first understanding conflicts and tradeoffs.

How do these proposed actions improve habitat quality, quantity, and connectivity of threatened, endangered, and sensitive wildlife species? You have provided a list in Purpose and Need followed by a Proposed Action and a Description of Proposed Treatments but nowhere are these three tied together. This document fails to show how your Proposed Action (a single paragraph) accomplishes a Purpose and Need. You also fail to identify any negative impacts to wildlife and watersheds that may arise as a result of the Proposed Actions or the Proposed Treatments. We know there will be impacts and they need to be identified and disclosed, so that tradeoffs can be weighed and steps can be taken to minimize negative impacts.

Proposed Treatment Types by Ecological Response Unit We have several questions regarding this chart (Table 2). Under hand thinning you identify this as a primary treatment when vegetation and fuel structure exceed desired conditions. What is the objective measurement tool utilized by the forest service to make this determination?

Under mechanical treatment and Herbicide Application you mention "undesired woody resprouters," but fail to identify what these species are. These should be identified in the EA.

We are pleased to see this proposal would not authorize activities in Special Management Areas other than prescribed or natural burns.

The Peloncillo FireScape project should not be used to achieve other district desires, especially ones that have trouble getting approval via the regular NEPA and ESA processes. This included but is not limited to cutting new or long abandoned roads. Any fuel breaks should be restored as soon as possible to prevent the spread of invasive plants, illegal off road driving, or poaching.

Thank you for the opportunity to comment on the Peloncillo FireScape Scoping document. We look forward to reviewing the detailed and specific draft Environmental Analysis when it becomes available.

Sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Seth D. Hadley
President of West 338 Ltd., general partner of
The Family Lands Limited Partnership