Douglas Ruppel

C/o Mindi Lehew

Coronado National Forest

300 West Congress St

Tucson, AZ 85701

June 11, 2023

Dear Mr. Ruppel,

We have reviewed the Scoping document for the Peloncillo FireScape project. Our comments are provided below.

1. We took close note of the Purpose and Need section. We trust the draft Environmental Analysis (EA) developed for this project, will contain a detailed plan showing how the Forest Service will achieve the conditions identified in each of the seven bullet points.
2. An overarching outcome for this project would be restoring the natural landscape to the point where all naturally occurring fires are allowed to burn without human interference. One “purpose” statement found in the Legal Notice alludes to this and is most important. The other statements that pertain to the “purpose” are steps along the path to this final desired outcome.

With this in mind, we point to the extensive use of natural and prescribed fire as a management tool in the greater Peloncillo region. The use of this management tool goes back several decades, achieving high degrees of success. The most important component of an effective Peloncillo FireScape plan will be the incorporation of these previously burned areas into a restoration strategy. This in turn, would lead to all areas within the Peloncillo FireScape boundary being in an ecological state in which natural fires burn without human intervention.

1. There are a number of management tools highlighted in the Scoping Document. While we appreciate this comprehensive listing of tools and techniques, we anticipate the draft Environmental Analysis (EA) will have developed strategies that tie into previous actions and activities.

In line with this, the draft EA should 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.

1. We are pleased to see that other than prescribed or natural burns this proposal would not authorize activities within Special Management Areas.
2. The sections titled under Decisions to be Made is confusing and in conflict with your beginning paragraph in which you note, “The Douglas Ranger District is currently preparing an environmental analysis of this proposal and seeks your assistance to better identify issues, concerns, and opportunities.”Later, in Decisions to be Made you state, “the decision to be made is whether to approve the Proposed Action, another alternative, or develop an alternative design that meets the purpose and need and moves the area towards the desire condition, or to not implement a project at this time.”

The Proposed Action as identified in this Scoping document is not adequate for a decision. It lacks sufficient substance and analysis to qualify as a decision document. Attempting to use this document is as a decision document would not be legally or administratively permissible under provisions of the Administrative Procedures Act.

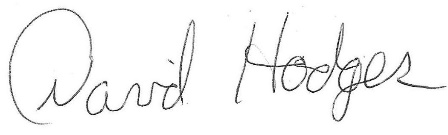
You can at this time make the decision to develop an Environmental Analysis, develop an alternative design, or decide not to implement this project at this time. You also have the authority to decide the proposal “would result in significant effects requiring analysis through an environmental impact statement.”

It’s possible a premature decision is not your intent. If so, this section could be more clearly written to reflect your actual intent. This should be clarified before you move forward.

Thank you again for the opportunity to comment. We look forward to reviewing the Peloncillo FireScape Environmental Analysis, when it’s made available to the public.

If you have any questions please feel free to contact me.

Sincerely,



David Hodges

Natural Allies

Tucson, AZ

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