*Pelloncillo Firescape Draft EA Comments - Malpai Borderlands Group*

The Firescape Plan will continue the actions from the Programmatic Plan, which has served us well since 2005.  The additional practices proposed are already allowed in the LMP, but difficult to finance. We support the Proposed Action.

It is positive that the USFS reestablish goals to reduce unnaturally high fuel loads to reduce fire risk, and that they recognize fire as a natural landscape process, and explicitly move away from the old policy of immediate suppression.  There is mention of restoring ecosystem structure in which fire plays a natural role; we support them in these goals.

The analysis of watershed condition shows that all the watersheds in the Peloncillos are in good functioning condition; after almost 20 years of fire management under the 2005 fire plan, this is a positive sign that fire management is on the right track.

Below are specific comments related to the Draft EA:

1. Throughout the document there is an assumption that the purpose of these management practices is to reduce fire intensity, and that all fires will be "cool season burns."  Some projects have an objective of modifying the vegetation and this will occasionally require a hot burn.

2. The Draft EA states, "Grazing must be delayed to allow recovery of forage." following a burn.  This is not always necessary depending on the timing of the burn and of rainfall, etc.  It would be better to say, "Following any burn, a site evaluation will be made to plan to minimize grazing impacts."

3. The EA (page 50) lists 11 species of concern that "do not occur in the action area, or downstream."  In our current litigious climate, this might be inviting appeals and legal action.

4. The EA (page 53) and the Biological Assessment state that the preferred alternative is "Likely to Adversely Affect the New Mexico Ridge-nosed Rattlesnake."  We disagree.  There are many more of these snakes in the nearby Animas Range and in Mexico, where fire is much more frequent.

5. The EA (page 54) and the BE also indicate that the project is "Likely to Adversely Affect the Chiricahua Leopard Frog."  We fail to understand how restoring a natural process and improving watershed stability can have an adverse effect.

6.The Forest & Woodland Effects Analysis lists a "Ponderosa Pine-Evergreen Oak Community." It also refers to Arizona Pine and Apache Pine.  We are not aware of these species in the planning area.  Perhaps you meant Chihuahua Pine.