

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

March 18, 2024

Dear Mr. Ruppel,

The Chiricahua Regional Council and Natural Allies are submitting the following comments in regards to the Peloncillo Firescape Draft Environmental Assessment (EA). Both organizations submitted Scoping Comments.

The Chiricahua Regional Council (CRC) and Natural Allies (NA) have reviewed the Draft Environmental Assessment as well as the numerous supporting documents and appendixes. Our comments are provided below.

We are familiar with and have reviewed comments submitted by New Mexico Wild. We incorporate those comments by reference into our comments.

The EA shows significant progress when measured against the Scoping document previously reviewed and commented on. Many of the questions posed by CRC/NA have been addressed. We appreciate this additional information which allows us to provide better guidance/analysis when providing these comments.

1. The following from our Scoping comments have not been addressed adequately. *“How do these proposed actions improve habitat quality, quantity, and connectivity for threatened, endangered, and sensitive wildlife species?”*

As CRC/NA pointed out in previous comments, the Coronado National Forest has 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 accomplishes the Purpose and Need. You fail to identify any long term negative impacts to wildlife and watersheds that may arise as a result of the Proposed Action or the Proposed Treatments. This EA is much too optimistic when identifying impacts to landscapes and species – negative impacts identified are always “temporary.” There are no permanent or long-term negative impacts identified. This is not realistic. We know there will be impacts and these impacts need to be identified and disclosed, so that tradeoffs can be weighed and steps can be taken to minimize negative impacts.

2. The EA proposes mechanical treatments on up to 40% slope. This is much too steep and would result in unacceptable levels of erosion. We suggest bringing the number to 10% or lower.
3. A number of non-native grasses exist within the project area. Two in particular are of concern to us. The EA mentions Lehmann's lovegrass which is covered in comments submitted by New Mexico Wild. The draft EA does not identify Yellow bluestem (*Bothriochloa ischaemum*) as a species of concern. The spread of both is facilitated and intensified by fire. Pre-fire monitoring must be required to identify locations of extensive patches, and must be treated prior to prescribed fire ignition. An essential component of this project should be post treatment monitoring of these stands of exotic grasses.
4. Mechanical treatments should be prohibited within the boundaries of Wilderness Study Areas (WSA). To protect wilderness values, Wilderness Study Areas are required to be managed as if they are Wilderness. As this EA allows for mechanical treatments within two WSA's, a Minimum Requirement (aka Minimum Tools Analysis) must be completed prior to any site specific activities within either WSA.
5. The Peloncillo Mountains are currently in extreme drought status. Treatments should never be done under this scenario and only initiated during periods of sufficient rainfall to facilitate adequate recovery.
6. We are not opposed to limited herbicide use but have concerns of the extent of use for this project. Herbicides treatments as proposed in the EA are overly broad. What are the effects on aquatic species? What are the potential negative effects on non-target species? What are the effects on avian species (listed and migratory), whose foraging targets are contaminated by herbicides? Simply stating there are no long term effects is not sufficient. Site specific treatments should be developed and information provided to the public. Currently, the EA only lists the many different chemicals proposed for use, and sites for treatment. The two need to be tied together with information on what herbicides will be used at a specific site and why the specific herbicide is desirable for use on a specific target species, in a specific location.
7. A robust monitoring plan should be developed as a component of this project. This is the only way to determine if treatment strategies have met their objectives. This provides additional value for future restoration by showing which treatment strategies work best in each habitat type.
8. The EA proposes a size cap for tree removal of up to 24 inches dbh (diameter at breast height). There are few trees in the Peloncillo Mountains this large. The species found here that might get this large are likely limited to Sycamores, Cottonwoods, Chihuahua Pine, and Alligator Juniper. The first three are limited in numbers across the project area and all should be retained, regardless of size. Alligator Juniper is limited across the project area in this size class. We propose cutting no trees larger than 15 inches diameter at breast height.

9. Information on mechanical thinning remains vague. 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? What are the potential negative impacts of this specific action? This information should be included in an EA/EIS, which would thoroughly examines impacts, both positive and negative.
  
10. We support the overarching goals identified in Purpose and Need but remain concerned as to the process for meeting those goals. There is little detail within the remainder of the document on how we get from here to there. The Proposed Action exists as a listing of potential management activities, with lots of redundancy throughout the EA.

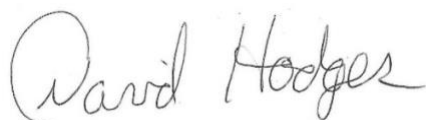
The Peloncillo Firescape Draft Environmental Assessment is not sufficient for a project of this size and scope. The Draft EA allows for mechanical treatments (pg. 19) in two Wilderness Study Areas and prescribes mechanical treatment within an Inventoried Roadless Area. Prescribed fire is proposed in a Zoological and Botanical Area, established primarily for rare plant species. This project proposes herbicide treatment in multiple riparian areas across much of the project area. If this project moves forward, a more comprehensive Environmental Impact Statement (EIS) is required to adequately assess site specific impacts to vegetation and wildlife. These include numerous sensitive, threatened, and endangered species (two which are flagged by the U.S. Fish and Wildlife Service as Likely to Adversely Affect) in the project area, which is more than 85,000 acres in scope. Unless the Forest Service considers this EA to be Programmatic in nature, the scope of this project requires an Environmental Impact Statement.

Thank you for the opportunity to comment on the Peloncillo FireScape Draft Environmental Assessment. Please let us know if you have any questions.

Sincerely,



Dirk Sigler - President  
Chiricahua Regional Council



David Hodges  
Natural Allies  
dhodges73@gmail.com