



October 09, 2025

Mr. Eric Robertson
Environmental Coordinator
Apache-Sitgreaves National Forests Supervisor's Office
30 S. Chiricahua Drive
Springerville, AZ 85938

Electronically submitted to: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=65243>

RE: Round Valley Firescape Project - Draft Environmental Assessment

Dear Mr. Robertson:

The Arizona Game and Fish Department (Department) appreciates the opportunity to review the Round Valley Firescape Project - Draft Environmental Assessment and provide comment. The Department understands that the Springerville Ranger District of the Apache-Sitgreaves National Forests (ASNFs) is proposing to implement the Round Valley Firescape (RVFS) project on the Springerville Ranger District. Restoration of Arizona's forests is of paramount importance, and the Department supports efforts to restore forest conditions that protect Arizona's communities and watersheds, and enhance wildlife habitats and wildlife recreational opportunities. It is understood that the purpose of this project is to utilize active forest management to promote landscape resilience to natural and human-caused disturbances, create a safer firefighting environment within the wildland urban interface, and restore landscape desired conditions to promote natural fire regimes.

The Department understands that the Proposed Action would treat the approximate acres below: 16,580 acres with mechanical thinning and 5,205 acres with manual thinning, planting is proposed on 2,382 acres of previously burned areas, and prescribed burning is proposed for approximately 27,041 acres. It is understood that approximately nine miles of temporary roads will be decommissioned once treatments are completed. For trails, trail maintenance is proposed for all trails within the project area, and 0.51 miles of the South Fork Trail is proposed for decommissioning and will be replaced by 0.64 miles of new trail construction in a more sustainable location.

Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission, has jurisdictional authority and public trust responsibilities to conserve and protect the state fish and wildlife resources. In addition, the Department manages threatened and endangered species through authorities of Section 6 of the Endangered Species Act and the Department's Section 10(a)(1)(A) permit. It is the mission of the Department to

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conserve and protect Arizona's diverse fish and wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations. For your consideration, the Department provides the following comments based on the agency's statutory authorities, public trust responsibilities, and special expertise related to wildlife resources and recreation.

Treatment in Mexican Spotted Owl Protected Activity Centers (PACs)

The Department understands that treatment within PACs is necessary to reduce fire hazard, and as such, welcomes their inclusion in the Proposed Action of fuel reduction treatments. The Department recommends a phased implementation within the first treatment across the landscape; this could ensure that not all MSO habitats are being treated at the same time. The Department recommends that all treatments (including spring/drainage projects) and timber harvest occur outside the breeding season if PACs are occupied. Lastly, the Department recommends that hauling timber be avoided in PACs during breeding season; if this is not feasible, vehicles should remain greater than or equal to 0.25 miles from the core areas, and trucks should drive less than 25 mph in PACs.

Treatment in Northern Goshawk Habitat:

Approximately 2,500 acres of the proposed treatment will occur within Northern Goshawk foraging, nest stand, and four post-fledgling family areas (PFAs). The Department appreciates the strategy of thinning these areas to a necessary basal area per acre and recommends that the created openings not exceed 2 acres within the PFAs. The Department further recommends that all treatments (spring/drainage projects) and timber harvest occur outside the breeding season if nest stands are occupied. Lastly, the Department recommends that hauling timber be avoided in PFAs during breeding season; if this is not feasible, vehicles should remain greater than or equal to 0.25 miles from the core areas, and trucks should drive less than 25 mph in PFAs.

Mechanical Treatments:

The Department supports the implementation of mechanical treatments to move overly dense forests toward conditions that result in a more sustainable and healthy forested landscape, and enhanced vegetative structural conditions that provide for the full complement of native wildlife species found within the project area. Retention of large and pre-settlement trees is an essential component of a forest restoration project, especially in areas deficient in large trees, and the Department recommends against removal of such trees should be avoided except where human safety is at risk or where their removal is necessary to avoid further habitat degradation. However, the Department further recommends that mechanical treatments not occur within nest stands or within replacement nest stands of northern goshawk habitat.

Prescribed Burning:

The Department supports the use of fire as a treatment component for the restoration of fire-adapted landscapes. Although mechanical thinning is often necessary to safely reduce tree densities, the benefits to understory vegetation may not be fully realized without the appropriate application of fire. The Department recommends that prescribed fire treatments be implemented to avoid fawning season (May-June) for pronghorn. Lastly, burning in PACs should be coordinated spatially and temporally to limit smoke impacts, particularly for PACs with nests in

low-lying areas. The Department appreciates the inclusion of prescribed fire, including maintenance burns, as a treatment component in the Proposed Action.

Grassland and Meadow Restoration:

The Department supports the actions described in the Proposed Action to restore and enhance grasslands and meadows. When creating openings or restoring meadows, the Department recommends that slash be chipped or cut to less than 18" height. Also, the Department recommends that treatments implemented on grasslands and meadows avoid the pronghorn fawning season (May-June).

Monitoring:

The Department recommends pre- and post-treatment monitoring of the project area to determine the success or failure of mechanical and manual thinning, prescribed burning, planting previously burned areas, and natural recovery areas. If pre- and post-treatment monitoring occurs, the Department would appreciate an update regarding the success or failure of treatment strategies.

The Department appreciates the opportunity to provide input on the Round Valley Firescape Project - Draft Environmental Assessment. The Department looks forward to continued coordination and collaboration with the ASNF as well as other stakeholders throughout the implementation and monitoring phases of this project. For further coordination, please contact Elizabeth Johnston at ejohnston@azgfd.gov or 382-532-3683.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aaron Hartzell', with a stylized flourish extending to the right.

Aaron Hartzell
Regional Supervisor, Region I

cc: Callie Cavalcant – Habitat, Evaluation, and Lands Branch Chief

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