October 9, 2025

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

Submitted electronically to: *https://cara.fs2c.usda.gov/Public/CommentInput?Project=65243*

Re: Round Valley Firescape Project # 65243

To Eric Robertson and the Apache-Sitgreaves National Forest:

These comments are submitted on behalf of the Center for Biological Diversity regarding the U.S. Forest Service's Draft Environmental Assessment for the Round Valley Firescape Project ("Round Valley Project," "Draft EA," "proposed action," or "project"). The Draft EA was issued on September 11, 2025, with the statement that comments would be accepted through October 10, 2025.

The Center for Biological Diversity supports efforts to protect communities from the threat of wildfire and to safely restore ecologically beneficial fire to landscapes. Such projects must be appropriately sited, designed, and maintained. To be effective, wildland-urban interface projects must be directly connected to home-hardening and the treatment of the home ignition zone directly surrounding communities and structures, and fire risk reduction projects require long-term maintenance of fuels beyond the initial round of thinning and prescribed fire.

The following comments are supportive of the Round Valley Project as a whole, and are intended to clarify the needs for addressing the threat of wildfire and safely restoring ecologically beneficial fire as a long-term management tool at the landscape scale.

1. The Project proposes to treat an excessively large area as wildland-urban interface, without consideration of existing fuelbreaks, site conditions, or distance from structures and infrastructure.

The Project identifies as wildland-urban interface an area stretching as far as 4.8 miles from the southern edge of Eagar. At its narrowest point, the WUI area stretches 2.4 miles from the edge of the community. This is a much larger area, stretching much farther from development, than is effective at protecting structures and infrastructure, and presents a massive ongoing demand for maintenance in perpetuity.

The Draft EA cites the Apache-Sitgreaves National Forests Land Management Plan definition of wildland-urban interface.

> Wildland Urban Interface (WUI) is defined in the Apache-Sitgreaves National Forests Land Management Plan as those areas of resident populations at imminent risk from wildfire, and human developments having special significance. These areas may include critical communications sites, municipal watersheds, high voltage transmission lines, church camps, scout camps, research facilities, and other structures that, if destroyed by fire, would result in hardship to communities. These areas encompass not only the sites themselves, but also the continuous slopes and fuels that lead directly to the sites, regardless of the distance involved (pg. 171).[1]

Aside from this definition, the Land Management Plan provides little direction on the designation or treatment of wildland-urban interface. There is only this general direction on protecting residents and critical sites. However, the Draft EA provides no information on how the wildland-urban interface was delineated in the Round Valley Project, nor does the Draft EA identify the location or nature of the structures or infrastructures that wildland-urban interface treatments are intended to protect. We recommend that the subsequently prepared NEPA analysis for this project include such information.

In addition, while the Land Management Plan explicitly states that there is no maximum distance for the designation of the wildland-urban interface, that same definition explicitly states that the wildland-urban interface applies specifically to "*the continuous slopes and fuels that lead directly to [critical structures and infrastructure]*."[2] However, the areas designated in the Draft EA as wildland-urban interface include many sites, totaling thousands of acres, that contain no structures or infrastructure, and that are <u>not</u> continuous in slope and fuel with any structures or infrastructure.

Specifically, the Draft EA fails to explain how large areas with very low tree densities qualify as "continuous slopes and fuels that lead directly to the [at risk] sites." There are thousands of contiguous acres with less than five trees per acre, including many hundreds of acres with no live trees. Yet, the wildland-urban interface delineation extends through these areas to include wooded areas to their southeast, upwind under the prevailing wind conditions. The Draft EA designates this as wildland-urban interface despite the fact that there are <u>not</u> "continuous slopes and fuels" connecting these forested areas with any structures or critical sites.

For example, the wooded area around Brian Spring (about three miles due west of the Three Point Mountain Trailhead along SR 261), on the western edge of the area designated as wildland-urban interface, is separated from the town of Eagar, SR 261, and any other recognizable infrastructure, by many cliffs and ridges, and large post-fire areas with few or no live trees. Many of these areas of extremely low tree density are hundreds to thousands of feet wide and run northwest to southeast in a way that would make them particularly effective at disrupting the spread of wildfire in the direction of Eagar. The same is true for the forested areas around the Water Canyon Trailhead, along Water Canyon Road. Those areas are bounded on all sides by

[1] Draft EA at 2.

[2] Apache-Sitgreaves National Forests Land Management Plan at 171.

meadows, post-fire areas, and drainages. These are not continuous slopes and fuels that lead directly to the town of Eagar or any other identifiable infrastructure before first passing through one or more potential fuelbreak.

There are many other examples. The electrical utility transformer unit on the south side of Route 76 is separated from the nearest individual tree by 100 feet, and is surrounded by many acres of treeless land. The lone building south of Route 76 is surrounded on all sides by an opening 150 feet wide or more and sits in a clearing of several acres. The structures at the parking lot for the Saffel Canyon ATV Trail are concrete and steel, and are surrounded by a tree density of about 5 trees per acre.

Furthermore, the Draft EA fails to consider that the west half of the Project—almost everything west of Snowline Road and the 26-Bar Hereford sign—is bounded to the north by state land. This state land includes many hundreds of acres with few or no trees with no development or critical infrastructure beyond SR 260. SR 260 itself is bounded on both sides by a clearing extending between 500 feet and 5000 feet from the road. To the east, there is a very open area on both sides of SR 261 that would serve as a wide fuel break. That is, the west half of the Project does not contain continuous slopes and fuels that lead directly to development or infrastructure.

We recommend that the subsequently prepared NEPA analysis for this project identify where and how the lands designated as wildland-urban interface meet the definition of areas where "continuous slopes and fuels that lead directly to [critical structures and infrastructure]." Focusing on the areas most likely to protect communities and structures is critical to ensure the effectiveness of the project, at the time and geographic scales necessary to address the risks.

2. The project should be directly connected to the treatment of homes at the wildland-urban interface.

The most effective way to prevent homes from igniting during wildfires is to make the homes themselves more fire-safe through the implementation of proven home fire-safety measures: retrofitting homes and other structures with fire-resistant roofing, rain gutter guards, ember-proof vent screens, and pruning vegetation in the defensible space immediately surrounding them. Home safety retrofits and vegetation treatment in the "home-ignition zone" within 100 feet of a house provide the most direct and effective way to prevent wildfire from going from the forest to the home.[3]

[3] Cohen, J.D., Preventing disaster: home ignitability in the Wildland-Urban Interface, 98 Journal of Forestry 15 (2000); Cohen, J.D. & R.D. Stratton, Home destruction examination: Grass Valley Fire, U.S. Forest Service Technical Paper R5-TP-026b (2008); Gibbons, P. et al., Land management practices associated with house loss in wildfires, 7 PLoS ONE e29212 (2012); Syphard, A.D. et al., The role of defensible space for residential structure protection during wildfires, 23 International Journal of Wildland Fire 1165 (2014); Scott, J.H. et al., Examining alternative fuel management strategies and the relative contribution of National Forest System land to wildfire risk to adjacent homes – A pilot assessment on the Sierra National Forest, California, USA, 362 Forest Ecology and Management 29 (2016); Syphard, Alexandra D. et al., The importance of building construction materials relative to other factors affecting structure survival during wildfire, 21 International Journal of Disaster Risk Reduction 140 (2017); Syphard, Alexandra D. et al., The relative influence of climate and housing development on current and

To be effective, a WUI project must be directly connected to home treatments. In the absence of such treatments, houses and communities will still be at risk of wildfire, regardless of the WUI treatment. To be effective at reducing home ignitions, the Project should be implemented in coordination with the treatment of houses and the ignition zone directly surrounding houses and critical infrastructure. We recommend that the subsequently prepared NEPA analysis for this project include and describe measures for such coordination.

3. Fuel treatments require subsequent and ongoing management to maintain reduced understory fuels.

Because understory vegetation regenerates quickly after mechanical thinning, leading to a rapid recovery in fire risk (depending on site productivity, forest type, and weather), WUI treatments and shaded fuelbreaks must be maintained at intervals, in perpetuity.[4] However, the Draft EA fails to address the need for follow-up treatments to maintain the effectiveness of fuelbreaks, nor does the Draft EA indicate how follow-up treatments will be implemented.

For example, the Project should include a long-term maintenance plan that provides for maintenance of fuel treatments on 10- to 20-year intervals. NEPA analysis should analyze and disclose the fire hazard profile of the project area in the years following the initial treatment, and the potential for increasing fire risk in the years following fuel treatment.

The Project should prioritize the use of prescribed fire to reduce fuel loads and maintain them over time. The NEPA document should include, and analyze the impacts of, an alternative that uses prescribed fire for long-term management of WUI areas and fuelbreaks.

4. The northern goshawk PFAs and nest areas currently have relatively low tree densities and are generally surrounded by areas of extremely low tree densities.

The Project proposes group selection and free thinning to 60-80 square feet basal area per acre within goshawk PFAs and to 80-100 square feet basal area per acre within nest areas.[5] 60 and 80 square feet per acre are relatively low basal areas, most applicable in dry, low-productivity sites. Nonetheless, all four identified goshawk PFAs currently have basal areas within these ranges or only slightly above.

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projected future fire patterns and structure loss across three California landscapes, 56 Global Environmental Change 41 (2019); Cohen, Jack, A more effective approach for preventing wildland-urban fire disasters, In A New Direction for California Wildfire Policy—Working from the Home Outward, Leonardo DiCaprio Foundation (February 11, 2019).

[4] Vaillant, et al., 2015. Fuel accumulation and forest structure change following hazardous fuel reduction treatments throughout California. International Journal of Wildland Fire. 24: 361-371. http://dx.doi.org/10.1071/WF14082; Morici et al, 2021. Long-Term Effects of Fuel Reduction Treatments on Surface Fuel Loading in the Blue Mountains of Oregon. Forests 2021, 12(10), 1306; https://doi.org/10.3390/f12101306; Keifer, M., van Wagtendonk, J.W. & Buhler, M. Long-term surface fuel accumulation in burned and unburned mixed-conifer forests of the Central and Southern Sierra Nevada, CA (USA). fire ecol 2, 53–72 (2006). https://doi.org/10.4996/fireecology.0201053

[5] Draft EA at 4.

It is apparent that the PFAs do not generally require thinning to achieve these goals. We request that the Forest Service consider an alternative or a mitigation measure that protects the goshawk PFAs from thinning.

In addition, three of the four identified goshawk nest areas are surrounded by areas of low basal area, including large areas with basal areas less than ten square feet per acre. The goshawk PFAs in the Project area are, in most cases, islands of modestly dense forest in a matrix of burned areas, grassland, and extremely open forest with basal areas near ten square feet per acre. These areas are productive for goshawk due to the higher tree density, and these areas are not at high fire risk due to the areas of low tree density that surround them.

In those instances where goshawk PFA treatments overlap with wildland-urban interface treatments, those WUI areas are not "continuous slopes and fuels" connecting these forested areas with any structures or critical sites. In each case, the goshawk PFA is separated to the north and east by one or more large openings that provide a fuel break between the PFA and downwind infrastructure.

In the case of all four PFAs, it is apparent that thinning is not necessary to achieve either fire risk reduction or wildlife habitat goals.

5. The Mexican spotted owl PACs and nest cores currently have relatively low tree densities and are generally surrounded by areas of extremely low tree densities.

The Project proposes group selection thinning to 110 square feet basal area per acre or higher for MSO areas in pine-oak and to 120 square feet or higher in mixed-conifer.[6] However, all areas identified for MSO treatment appear to currently have basal areas already at these levels. It is apparent that the MSO areas do not generally require thinning to achieve these goals.

In addition, the Mexican spotted owl areas within the Project tend to be areas of moderate density in a matrix of meadow, post-fire areas, and forest of much lower tree density. The PAC on the south/east bank of Water Canyon Creek in particular, is of only moderate tree density and is closely bounded in all directions by large open areas with very low tree densities. In those instances where MSO treatments overlap with wildland-urban interface treatments, those WUI areas are not "continuous slopes and fuels" connecting these forested areas with any structures or critical sites. In each case, the MSO area is separated to the north and east by one or more large openings that provide a fuel break between the PFA and downwind infrastructure.

In all identified MSO areas, it is apparent that thinning is not necessary to achieve either fire risk reduction or wildlife habitat goals. We recommend that the Forest Service consider measures to exclude tree thinning in MSO areas.

The Project rightly proposes to retain all trees greater than 18 inches within PACs.[7] However, for MSO nest/roost areas, the Draft EA uses the language "most trees greater than eighteen inches DBH."[8] For clarity and to be consistent with MSO recovery guidelines, the direction should be "to

[6] Draft EA at 6.
[7] Draft EA at 6.
[8] Draft EA at 6.

retain all trees 18 inches DBH or greater." Because the current state of MSO nest/roost habitat within the project area is largely moderate tree density that requires little or no thinning, it is evident that there is no need to cut any trees 18 inches DBH or larger. However, if the Project intends to cut some trees larger than 18 inches, the EA should indicate specific criteria for the conditions requiring such removals.

6. The Project should retain all trees 18 inches DBH and larger.

The Draft EA does not provide an analysis of the distribution of tree sizes across the Project area. However, in even a cursory survey of the Project area it is clear that there is a lack of large trees across the area and within individual stands. Furthermore, due to past timber practices, trees 18 inches in diameter and larger make up less than 5% of the ponderosa pine forest in the Southwest, and trees 24 inches in diameter and larger make up less than a tenth of one percent. At the same time, trees smaller than 12 inches in diameter make up the vast majority of the forest.[9] Except in the case of hazard trees, the Project should retain all trees 18 inches DBH and larger.

At the forest scale, there is a severe deficit of old growth throughout the Southwestern Region, where only about 14 percent of the historical levels of old growth ponderosa pine and dry mixed-conifer forests remain, according to the 2023 analysis by the Forest Service. As stated in the Draft EA "no stands within the project area meet the definition of old growth."[10] This determination in the Draft EA is based on the definition of old growth forest in the Land Management Plan, which identifies a suite of components that comprise a fully functioning old growth forest, components such as old trees, dead trees (snags), coarse woody debris, and structural diversity.[11]

Given that there is no old growth forest within the 34,000 acre Project area, the project should identify areas with the potential to develop old growth characteristic in the future, and retain those areas as developing old growth. A primary component of all old growth is large and old trees, which are at a deficit across the Region, the Forest, and within the Project area. Given the deficit of larger trees and old growth, the Project should retain all trees 18 inches DBH and larger, both as a surrogate for the missing large and old tree components, and as developing old growth.

7. The Center for Biological Diversity would appreciate the opportunity to work with the Forest Service to develop prescriptions and marking guidelines for the Project.

The Round Valley Project includes a number of aspects that are critical for management throughout the Forest—wildland-urban interface, fuels reduction, existing fuel breaks, stream corridors, wildlife habitat, and Mexican spotted owl and northern goshawk areas. As such, the

[9] USDA. Forest Inventory and Analysis National Program—Forest Inventory Data Online. http://www.fia.fs.fed.us/tools-data/

[10] Draft EA at 12.

[11] Draft EA at 12.

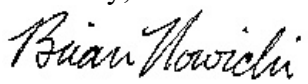
Project provides an excellent opportunity to develop mutual understanding and consensus that can be applied in other projects moving forward, such as with the retention of large, dominant and co-dominant ponderosa pine trees in groups with interlocking crowns. The Center for Biological Diversity would appreciate the opportunity to work with the Forest Service, including by visiting the Project area with Forest staff, to develop prescriptions and marking guidelines for the Project.

CONCLUSION

The Center for Biological Diversity supports efforts to protect communities from the threat of wildfire and to safely restore ecologically beneficial fire to landscapes, and we are supportive of the Round Valley Project as a whole. These comments are intended to clarify the needs for addressing the threat of wildfire and safely restoring ecologically beneficial fire as a long-term management tool at the landscape scale. Such projects must be appropriately sited, designed, and maintained.

We appreciate your consideration of the information and issues raised in these comments. We would be pleased to answer any questions and provide additional information on any of these points. We hope that the Forest Service offers additional opportunities to engage in the development of this project moving forward.

Sincerely,



Brian Nowicki
Center for Biological Diversity
Albuquerque, NM 87111
(505) 917-5611
bnowicki@biologicaldiversity.org