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Organization: Wildearth Guardians

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Comments: Dear District Ranger Doug Ruppel:

WildEarth Guardians respectfully submits these comments regarding the USFS Peloncillo Firescape Project to "treat the vegetation using wildland fire ... prescribed cutting, and mastication on at least 35 percent of the Peloncillo Ecosystem Management Area" every 10 years. The public notice states this project intends to conduct, "restoration actions to achieve multiple resource benefits and increase ecosystem resiliency". Although the scoping letter does not state the number of acres affected, it appears the goal is to treat ~18,874 acres per year (85,149 acres in the EMA minus 31,225 acres of wilderness areas, multiplied by .35, per the scoping letter and Forest Plan p 98) with prescribed fire and/or tree removal, including the use of tractors, bulldozers, excavators and other heavy machinery.

WildEarth Guardians is a nonprofit conservation organization with offices and staff in Arizona, New Mexico, and many other western states. WildEarth Guardians has nearly 200,000 members and supporters across the United States and works to protect and restore the wildlife and wild places of the American West. Please add our organization to the contact list to receive any future public notices regarding this project.

As AZ & NM residents, and visitors to the Coronado National Forest, we too share the desire for the forest to be resilient. As ecologists, we understand that achieving this under increasingly extreme temperature and moisture regimes is no simple task. Yet, diverse lines of scientific inquiry identify a range of actions that can be taken to support drought resilience, enhance watershed function, and reduce fire hazard, and that altering forest structure with heavy machinery has unintended, counterproductive effects. We have included comments regarding this science, including a special section on mycorrhizal fungi. We invite you to contact us to discuss.