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Title: Arizona State Director

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U.S. Forest Service, Coronado National Forest

Santa Catalina Ranger District

Attn: Christina Pearson, Interdisciplinary Team Leader

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Tucson, AZ 85750

also submitted electronically as a PDF via:

<https://cara.ecosystem-management.org/Public/CommentInput?Project=27526>

RE: Comments on Catalina-Rincon FireScape Project Environmental Assessment.

Dear Team Leader Pearson,

Please accept these comments from The Wilderness Society on the Catalina-Rincon FireScape Project Environmental Assessment dated February 2016.

The Wilderness Society is the leading conservation organization working to protect wilderness and inspire Americans to care for our wild places. Founded in 1935, and now with more than 700,000 members and supporters, The Wilderness Society has led the effort to permanently protect 109 million acres of wilderness and to ensure sound management of our shared national lands.

The Wilderness Society has a particular interest in the Santa Catalina District of the Coronado National Forest as many of our Arizona members and supporters live in or visit the area.

Further, we are engaged in a multi-year, multi-party effort to restore a healthy, viable and self-sustaining population of desert bighorn sheep to the Catalinas that coexists with an equally healthy native predator population in a naturally functioning ecosystem. As that group noted in a July 2013 op-ed on the project's launch: "The decision to return bighorn sheep to the Catalinas is motivated by several key conditions that make it possible to address most of the likely causes for their disappearance.

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First is the return of fire to the Catalinas. The huge fires 10 years ago burned away much of the unnaturally dense vegetation built up during decades of fire suppression, spurring the regrowth of a diverse array of plants that has significantly improved habitat for sheep.

Moreover, the Coronado National Forest is moving forward with its FireScape plan to return fire to its rightful role in the ecological equation-as a regular occurrence that's inherently beneficial for plants and wildlife. Low-intensity prescribed burns and other management actions can help ensure that neither people nor wildlife suffer the effects of a badly distorted fire regime again."

It is with that background that we support the purpose of and need for the proposal. In particular, we support ecosystem restoration that would "encourage the return of low- and moderate-intensity fire as a natural process in the ecosystem, and use the benefits of naturally occurring wildfire to maintain the character of the Pusch Ridge and Rincon Mountain Wilderness Areas." (EA at 10). We also support the effort to plan for and carry out the proposal at the landscape or Ecological Management Area (EMA) scale, rather than as a piecemeal series of smaller individual projects.

Of particular interest to us are the proposed actions within the Pusch Ridge and Rincon Mountain Wilderness Areas. Careful planning and management is necessary to protect and restore important wilderness vales and to comply with applicable law. In this case, we appreciate that, as a result of both grazing and decades of heavy fire suppression, the project area "has departed from historical vegetation structure and composition and disturbance patterns." (EA at 6).

We also appreciate that restoring wilderness characteristics from these human impacts may appropriately require additional human intervention. In this case, we support such intervention, as necessary to restore natural

ecosystem structures and functions, consistent with the Wilderness Act. However, we believe the EA does not provide sufficient information to make an informed and careful judgment as to the extent to which human intervention-including the potential use of motorized equipment-is necessary within the Wilderness Areas. We encourage using the Minimum Requirements Decision Guide (MRDG) prior to authorizing or carrying out project activities within the Wilderness Areas. We also encourage the publication of such an analysis so the public can make an informed decision whether to support the proposed actions.

We applaud and commend the Forest Service for developing this project to restore a naturally functioning ecosystem in the Catalinas and Rincons by taking actions to undo decades of detrimental fire suppression activities. We further applaud and commend the decision to

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approach solving this problem and conducting this restoration at the scale of the EMA. We also acknowledge the difficulties the Forest Service encounters on a project such as this and appreciate the effort that has gone into it thus far.

Without additional specificity and quantification of potential activities in designated Wilderness areas, we are having difficulty choosing between the Preferred Action or the Wilderness Alternative. Regardless, we do wish to emphatically convey our support for a landscape level restoration of fire in its traditional role to the Catalina-Rincon Mountains-which means "no action" is unacceptable; one of the action alternatives should be adopted. Finally, we offer our assistance. Should we be able to advance the goals of this project we would welcome a discussion about how The Wilderness Society might best contribute to the effort.

Sincerely,

Mike Quigley

Arizona State Director