



March 15, 2024

Mindi Lehew
c/o Douglas Ruppel, District Ranger
ATTN: Peloncillo FireScape Project
Coronado National Forest 300 West Congress Street
Tucson, AZ 85701

*Submitted via Peloncillo FireScape #58434 comment website at
<https://cara.fs2c.usda.gov/Public/CommentInput?project=58434>*

Re: Comments on the Coronado National Forest's Peloncillo FireScape Draft Environmental Assessment

Dear District Ranger Ruppel:

New Mexico Wilderness Alliance (New Mexico Wild) is a nonprofit organization dedicated to the protection, restoration, and continued enjoyment of New Mexico's wildlands and wilderness areas, with thousands of members across the state. We appreciate this opportunity to provide comments on the Coronado National Forest's (CNF) Draft Environmental Assessment for the proposed Peloncillo FireScape Project (Draft EA).

We understand that the intent of this project is to reduce fuel accumulations and treat vegetation composition and structure that contribute to the risk of uncharacteristic wildfire and associated negative effects to a variety of resource values; to maintain existing desired conditions; to increase opportunities for management of natural ignitions; to protect values at risk; to recover, restore, and sustain ecological processes; and to improve habitat quality, quantity, and connectivity.¹ We generally support the goals of this project and appreciate the fact that the CNF has considered what project activities are appropriate in special management areas.²

However, based on the information and analysis provided in the Draft EA, we are concerned that the proposed action may adversely affect the undeveloped quality of the Bunk Robinson and Whitmire Canyon Wilderness Study Areas (WSAs), one or more roadless area characteristics in the Peloncillo Inventoried Roadless Area (IRA), and native species composition in grassland and savannah ecosystems within the project area. The Draft EA contains inadequate analysis and design features to address these issues, and the Purpose and Need for the project is flawed with respect to grassland and savannah ecosystems.

¹ Peloncillo FireScape Draft Environmental Assessment (February 2024), p. 11 [hereinafter Draft EA].

² *Id.* at p. 19.



A. The CNF Should Preclude Chainsaw Use within WSAs or Incorporate Additional Mitigation Measures to Avoid Adverse Long-Term Impacts on WSAs.

With respect to the Bunk Robinson and Whitmire Canyon WSAs, the CNF states that proposed project activities would or may impact the four qualities of wilderness character in the short term, with no long-term impacts other than the possibility of a greater sight distance due to vegetation removal.³ However, the Draft EA does not address the potential for chainsaw use to have longer-term impacts on the “undeveloped quality” wilderness characteristic. Specifically, using chainsaws to construct firelines or helispots could result in the presence of logs, stumps, and slash that would impact the undeveloped quality of the WSAs in the longer term.

The CNF should address this by providing additional information about the extent of expected fireline and helispot development in the WSAs (e.g., whether this is anticipated to be negligible versus more widespread), and/or by requiring additional design features to ensure that these ancillary activities do not leave visual evidence of chainsaw use, fireline construction, etc. in the WSAs. As of now, the Draft EA provides mitigation measures to address visual impacts from slash and stumps only in the area immediately around the Geronimo Trail.⁴ The CNF should institute similar measures in WSAs or clarify the scope of the project to ensure that chainsaw use within the WSAs and the resulting visual evidence will be incidental and uncommon.

B. The CNF Should Exclude Mechanical Vegetation Treatment within the Peloncillo IRA or Incorporate Additional Mitigation Measures to Avoid Adverse Long-Term Impacts on Roadless Area Characteristics.

The Draft EA proposes mechanical vegetation treatment within the Peloncillo IRA.⁵ The proposal to allow prescribed cutting in the IRA raises concerns similar to those described above regarding chainsaw use in WSAs. Like the impacts of incidental motorized equipment use in WSAs, IRAs would be adversely affected by visual evidence of mechanical vegetation treatments, such as visually evident stumps and slash.

The Roadless Area Conservation Rule (Roadless Rule) requires that the Forest Service must manage IRAs to maintain roadless area characteristics,⁶ including maintaining “[n]atural

³ *Id.* at p. 43.

⁴ *Id.* at p. 107.

⁵ *Id.* at p. 20.

⁶ Roadless Area Conservation Rule, 66 Fed. Reg. 3244 to -73 (Jan. 12, 2001), p. 3247 (stating that “Promulgating this rule is necessary to protect the social and ecological values and characteristics of inventoried roadless areas from road construction and reconstruction and certain timber harvesting activities.”)



appearing landscapes with high scenic quality.”⁷ Leaving visible stumps and slash in an IRA would be inconsistent with the roadless area characteristic related to a natural appearing landscape.

The Draft EA reflects that the CNF understands that the presence of stumps and slash following project implementation has the potential to degrade scenery. In the analysis of effects to recreation resulting from prescribed cutting, the Draft EA states that “[v]isitors may avoid treated areas with views of freshly-cut stumps [and] vegetation piles” and that “[i]mplementation of mechanical treatments, including mastication and grubbing, would result in tree and vegetation removal, damage to trees and shrubs that would remain, slash and debris piles, stumps, bare ground (from fuel breaks and other work), and loss of visual screening.”⁸ The “Recreation, Scenery, Wilderness Study Areas, and Inventoried Roadless Area Effects Analysis” for the project acknowledges that the use of machinery would negatively affect the undeveloped quality of the IRA in the short term; yet the analysis asserts that longer-term impacts would not occur because the project does not propose to develop permanent structures or continue motorized transport or equipment use after project completion, somehow neglecting the fact that what are considered to be short-term impacts from mechanical vegetation treatments would not persist for many years.⁹ Design feature S-3, which seeks to mitigate impacts to scenery along the Geronimo Trail,¹⁰ also demonstrates that the CNF is aware that the presence of stumps and slash following project implementation has the potential to degrade scenery in the short and long term.

To address these impacts, the CNF should incorporate additional project design features (or mitigation measures) requiring that any prescribed cutting of vegetation within the IRA must be implemented via cutting at ground level (flush cutting) or comparable approach and that any slash must be promptly removed to eliminate visual impacts from the cutting of trees and other vegetation. These measures are needed to avoid adverse impacts on the IRA and to uphold the Roadless Rule’s requirement for the protection of “natural appearing landscapes with high scenic quality.” Alternatively, the CNF could remove mechanical vegetation treatments from the project activities allowed in the IRA to be more consistent with the proposed project activities within the WSAs.

⁷ *Id.* at p. 3245 (stating that “[n]atural appearing landscapes with high scenic quality” are an important value of IRAs and explaining that “[h]igh quality scenery, especially scenery with natural-appearing landscapes, is a primary reason that people choose to recreate. In addition, quality scenery contributes directly to real estate values in nearby communities and residential areas.”)

⁸ *Id.* at pp. 13-14.

⁹ Peloncillo FireScope Environmental Assessment: Recreation, Scenery, Wilderness Study Areas, and Inventoried Roadless Area Effects Analysis (February 1, 2024), p. 16.

¹⁰ Draft EA, Appendix C: Design Features, at p. 107.



C. The CNF Should Conduct Further Analysis and Incorporate Additional Design Features to Prevent Increased Invasion of Lehmann Lovegrass into Native Grassland Ecosystems.

Lastly, the Draft EA provides inadequate disclosure and analysis of the risk that the project will exacerbate problems caused by invasive species. A New Mexico Wild supporter who is intimately familiar with the project area has shared concerns with New Mexico Wild staff that previous burn operations in the desert grassland ecosystems that flank the neighboring Chiricahua Mountains have resulted in the replacement of native grassland species with a near monoculture of Lehmann lovegrass (*Eragrostis lehmanniana*). Despite the adverse impacts that past burn operations have had on the neighboring mountain range, in Draft EA the CNF acknowledges this risk in only a cursory manner, stating that wildfire and prescribed fire at any intensity may maintain or increase the occurrence of Lehmann lovegrass, which has the potential to out-compete native grasses.¹¹ The EA fails to adequately analyze the risk and the tradeoffs associated with a proposed action that is intended to benefit a wide array of resource values but may actually increase the spread of this nonnative, invasive species.

The Draft EA includes no design features or mitigation measures specific to addressing the risk of adverse environmental impacts from Lehmann lovegrass invasion. The primary mechanisms through which the Draft EA attempts to resolve nonnative invasive species issues more generally include (1) design features related to implementation, e.g. equipment cleaning to avoid the transport of nonnative invasive plant seeds, and (2) fire planning. The fire planning design features explicitly state that “fires can increase favorable conditions for invasive species,” and that invasive species will be monitored, documented, and treated.¹² However, semi-desert grassland and juniper grassland ecosystems amount to 41% of the project area,¹³ which is nearly 35,000 acres in size. How will the CNF realistically monitor and treat such a large area following project implementation? At face value, this proposal appears to be an infeasible approach to addressing the high potential for widespread invasion by Lehmann lovegrass.

The risks and impacts of Lehmann lovegrass are well documented. According to the USDA Forest Service Southwestern Region, Forests and Rangelands (a cooperative effort between the United States Department of the Interior, United States Department of Agriculture, and land management agencies), and others, Lehmann lovegrass was first introduced in the Southwest in part to provide forage for livestock.¹⁴ Furthermore, a variety of studies show that Lehmann

¹¹ Draft EA, p. 74.

¹² *Id.* at p. 105.

¹³ *Id.* at p. 7.

¹⁴ United States Department of Agriculture Forest Service Southwestern Region. (2017). *Field Guide for Managing Lehmann and Weeping Lovegrasses in the Southwest* (TP-R3-16-21), p. 1. Available at: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprdr563034.pdf [hereinafter USDA Field Guide], and



lovegrass seedling emergence increases after burning to the detriment of native grass reestablishment;¹⁵ that the invasion of Lehmann lovegrass into native grasslands may decrease biodiversity;¹⁶ that Lehmann lovegrass negatively impacts plant and animal communities;¹⁷ that Lehmann lovegrass creates fuel loads several times heavier than what the native grassland and savannah in this area historically contained;¹⁸ that the increased prevalence of Lehmann lovegrass in southern Arizona has altered the natural fire regime, resulting in more intense wildfires that occur at greater frequency;¹⁹ that Lehmann lovegrass regrows quickly after fire, may return at higher densities, and that specific action plans are needed to address infested areas;²⁰ that the use of prescribed fire to prevent shrub encroachment on desert grasslands compromises native grass species but does not appear to adversely affect Lehmann lovegrass;²¹ and that livestock grazing appears to result in a greater abundance of Lehmann lovegrass as compared to native grass species as grazing intensities increase.²²

In addition to Draft EA's lack of meaningful analysis and project design features related to the risk that this project may increase Lehmann lovegrass invasion, the science related to Lehmann lovegrass, including information acknowledged in the Draft EA, raises questions about the Purpose and Need for this project as applied to desert grasslands and savannah ecosystems. The "Need for the Proposal" states that grasslands in the project area are at risk of shrub encroachment and type conversion from grasslands to shrublands.²³ Additionally, the Purpose and Need for the project includes "Objectives" to reduce fuel accumulations that contribute to the risk of uncharacteristic fire and associated negative resource effects; provide protection to values at risk, including habitat; recover, restore, and sustain ecological processes, including

Forests and Rangelands. (2011). *National Fire Plan Success Story: Adaptive Management Experiment in a Non-Native, Invasive Grass, Coronado National Memorial, Arizona National Fire Plan – Fuels Reduction*. Available at: https://www.forestsandrangelands.gov/success/stories/2011/11_az_coro_hfr.shtml [hereinafter National Fire Plan Success Story].

¹⁵ Sumrall, L.B., B.A. Roundy, J.R. Cox, and V.K. Winkel. (1988). "Seedbed Ecology of Lehmann Lovegrass in Relation to Fire." Poster paper presented at the conference, Effects of Fire in Management of Southwestern Natural Resources (Tucson, AZ, November 14-17, 1988), p. 186. Available at: https://www.fs.usda.gov/rm/pubs_rm/rm_gtr191/rm_gtr191_186_189.pdf.

¹⁶ *Id.* at p. 186.

¹⁷ National Fire Plan Success Story.

¹⁸ *Id.*

¹⁹ USDA Field Guide, p. 2.

²⁰ *Id.* at pp. 2, 4.

²¹ McGlone, C.M., and L.F. Huenneke. (2004). "The impact of a prescribed burn on introduced Lehmann lovegrass versus native vegetation in the northern Chihuahuan Desert." *Journal of Arid Environments* 57(3), 297-310. Available at: [https://doi.org/10.1016/S0140-1963\(03\)00109-5](https://doi.org/10.1016/S0140-1963(03)00109-5).

²² McClaran, M.P., and M.E. Anable. (1992). "Spread of introduced Lehmann lovegrass along a grazing intensity gradient." *Journal of Applied Ecology* 29, 92-98.

²³ Draft EA, pp. 9-10.



desired native plant species and communities; and improve habitat quality, quantity, and connectivity.²⁴

We understand that prescribed burning in grassland ecosystems may prevent shrub encroachment and type conversion. However, prescribed burning in grassland ecosystems in southern Arizona also carries a very real risk of conversion of habitats dominated by native grass species to habitats dominated by Lehmann lovegrass, which would result in cascading impacts to biodiversity; endangered, threatened, and sensitive species; habit; ecological processes; and an increase in the frequency and intensity of fires (uncharacteristic wildfire). Burning within desert grassland and savannah ecosystems therefore appears to be inconsistent with most of the Purpose and Need for the project.

The Final EA should provide a much more robust analysis and design features related to the likelihood that the proposed action will exacerbate issues related to the invasion of Lehmann lovegrass into native grassland ecosystems. Additionally, because the project's impacts on desert grasslands and savannah ecosystems could be inconsistent with the stated Purpose and Need, the CNF should expand the range of alternatives within grassland and savannah ecosystems beyond the use of prescribed fire, which is the only tool proposed to address shrub encroachment. The Draft EA acknowledges that historic livestock grazing practices contribute to this issue.²⁵ If the CNF seeks to address the encroachment of shrubs into grassland ecosystems, it should consider modifications to grazing in these ecosystems to address this issue along with the risk of increased prevalence of Lehmann lovegrass, as well as other approaches that would produce results that are more consistent with the full scope of the Purpose and Need for the project.

D. Conclusions

In sum, New Mexico Wild supports the CNF in its efforts to take a science-based approach to restoration and the reduction of risk of catastrophic fire. However, a core part of our mission is to protect New Mexico's wildlands. IRAs in many instances have a high degree of wilderness characteristics yet lack robust and permanent protection afforded other congressionally designated areas. As currently drafted, the proposed action in the Draft EA is likely to result in significant impacts on the Peloncillo IRA in violation of the Roadless Rule and NEPA. The CNF should therefore include additional design features (mitigation measures) to protect the roadless area characteristics, including natural appearing landscapes, within the Peloncillo IRA. Additionally, the CNF should provide more information and/or design features to ensure that the undeveloped quality of the WSAs in the project area are not adversely affected in the long term. Lastly, the CNF should provide improved analysis and/or resolve issues related to the project

²⁴ *Id.* at p. 11.

²⁵ *Id.* at p. 9.



potentially exacerbating Lehmann lovegrass invasion and associated questions about the Purpose and Need for the project.

Sincerely,

[s] Bjorn Fredrickson
(electronic signature)

Bjorn Fredrickson
Conservation Director
New Mexico Wild
6000 Uptown Blvd. NE, Ste. 350
Albuquerque, NM 87110
(505) 843-8696
bjorn@nmwild.org