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CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Dear Ms. Tuell:

On behalf of the Coronado National Forest, I would like to thank you for your involvement in the Cienega Creek FireScope project in the Nogales Ranger District of the Coronado National Forest. This letter is in response to the objection you filed on the final Environmental Assessment (EA) and draft Decision Notice (DN) and Finding of No Significant Impact (FONSI). I have read and considered your objection, and reviewed the project record and final EA, including the environmental effects. My review of your objection was conducted in accordance with the administrative review procedures found at 36 CFR 218, Subparts A and B.

**PROJECT OVERVIEW**

This project will use a mix of fire and non-fire treatments to reduce fuel accumulations and uncharacteristic vegetation composition and structure in the Santa Rita ecosystem management area. The proposed actions are intended to restore ecological processes in this fire-dependent ecosystem, facilitate fire management, and create conditions that enable naturally occurring fires to return to their historic role in the ecosystem. The proposed actions will be implemented over a period greater than 20 years.

**ADMINISTRATIVE REVIEW PROCESS**

The legal notice for the objection filing period was published on September 18, 2020. Your timely objection (objection number 21-03-05-0001-O218) was received on November 2, 2020. The regulations at 36 CFR 218 provide a pre-decisional administrative review process in which the objector provides sufficient narrative description of the project, specific issues related to the project, and suggested remedies that would resolve the objections (36 CFR 218.8). This letter, including an instruction, is my written response to your objection.

**OBJECTION RESPONSES**

Issues or concerns presented in your objection are summarized and responded to below. You may be addressed as “the objector” in this section.

**Contention:** The objector contends that targeted livestock grazing is scientifically controversial, not proven as an effective treatment for invasive plants, and will not meet the purpose and need



for the project. Targeted livestock grazing will further exacerbate the spread of non-native invasive plants and increase the risk of high intensity wildfire. It will reduce fine fuels, which will preclude the use of natural fire and at the same time continue to alter the plant composition, favoring invasive species over native species of grasses and other plants. The Forest has not conducted any on-the-ground analysis related to the use of livestock for “targeted grazing” as a fuel reduction method. The Forest’s response to the objector’s question of whether the 45 percent utilization for targeted grazing would be implemented regularly or rarely is that “utilization should be based on site-specific resource conditions and management objectives”, repeating that utilization will be between 15 to 45 percent. The Forest fails to comply with NEPA by refusing to disclose to the public whether, based on its current information and analysis, it believes that the 45 percent utilization will be frequently or infrequently necessary. The Forest has not adequately responded to concerns and provided no information to refute the contention that targeted livestock grazing is scientifically controversial and therefore, cannot rely on this DN and FONSI to authorize targeted livestock grazing for this project. [Objection, pp. 2-3]

**Response:** The Cienega Creek FireScope project is intended to restore and sustain ecological processes in a fire-dependent ecosystem through the use of a variety of methods, including the use of prescribed or targeted grazing [EA, pp. 13-14]. Prescribed grazing would be used to remove fuel from predetermined areas in the wildland-urban interface (WUI) [EA, p.6]. The location and approximate number of acres to be treated are included in the EA [EA, Table 1, p. 4; Table 2, p. 9; maps Appendix B, pp. 53-54]. Actual treatment acres would depend on objectives, environmental conditions at the time of proposed implementation, and occurrences of natural fire starts.

Grazing within these areas is already authorized; this decision does not authorize grazing or change any aspect of the allotment management plans, permitted livestock numbers, or alter previously conducted analyses [EA, p. 5]. This tool would be used within the parameters of those existing authorizations. For example, to achieve the goal of reducing fine fuels, a forage utilization guideline of 45 percent may be implemented which is within the limits of utilization included in the existing Allotment Management Plans [EA, p. 6]. The effects of prescribed grazing related to this decision are discussed in this analysis [EA, pp. 16-17, 20, 23-26, 29, 31, 38, 41].

Targeted grazing is not being proposed as treatment for invasive plants. The EA acknowledges that while invasive species could be spread due to project activities, the possible spread would be mitigated by best management practices and project design features [EA, Appendix A, pp. 43-51]. Further, the Coronado National Forest has an active and ongoing program to reduce and control invasive species [EA, pp. 25-26].

The objector contends that targeted livestock grazing is scientifically controversial but did not provide any specific information or areas of controversy to be considered in the analysis in either their 2019 comment letter or this letter of objection to the draft decision. As noted above, there is no change to current grazing authorizations proposed with this decision, and the environmental analysis considered the effects of grazing related to this decision.

**Contention:** The objector contends that the Forest must consider new scientific information regarding vegetation treatments and livestock grazing impacts. The Forest bases its “targeted” livestock grazing program on the premise that livestock will remain where the Forest wants them to remain. This is rarely the case. Any analysis based on the premise that livestock will remain

where they are intended to remain as part of a “targeted” grazing program must be revisited. The objector suggests the Forest must re-examine the relationship between livestock grazing and fire, the link between the presence of livestock grazing and cheatgrass, and the impact of grazing on ecosystem health by considering new information provided in appendices to this objection. [Objection, pp. 3-5, appendices B, C, D]

**Response:** The objector provided additional scientific information for consideration by the Forest. As a note, additional scientific information would be more useful were it made available as the project is developed or, perhaps, during comments on the draft environmental analysis. Nevertheless, we reviewed and considered the articles.

Regarding the Pierce *et al.* 2019 literature (Objection, appendix B), the EA supports the same concepts and ideas presented in this literature [EA, p. 2]. Regarding the Bradley and Colodner 2019 literature (Objection, appendix D), this paper is not a study that presents new data. It is a reference module, as the last part of the reference states.

The Williamson *et al.* 2019 literature (Objection, appendix C) references the Great Basin. As the project area does not occur in the Great Basin and there is no known cheatgrass on the district, this science is not applicable to this project. If in the future cheatgrass were found, the design features found in the EA would reduce the spread [EA, pp. 43-51. The Forest has an active and ongoing nonnative invasive program that would take steps to control or eradicate the cheatgrass [EA, p. 26].

**Contention:** The objector contends that the use of motorized and mechanized equipment would result in a violation of the Wilderness Act. While the Forest has provided the Minimum Requirements Decision Guide (MRDG), the public had no opportunity to review and comment on it. The objector finds the analysis in it lacking. The objector contends there is no need for the use of chainsaws in designated Wilderness areas, nor does the Forest need to use motorized transportation for personnel engaged in planned wildland fire management actions within designated Wilderness areas. The Forest attempts to justify the use of chainsaws and weed-eaters by stating that these tools are “necessary” because they will “reduce firefighter time and exposure to hazards.” (MRDG, p. 21). The “risk” the Forest is discussing in the MRDG is not described. The Forest then admits that the exposure to hazards argument is not accurately described by stating that chainsaw and weed-eater use would be for line prep, prior to any fire ignitions. The “need” to reduce time in the field is not a legitimate excuse to violate the Wilderness Act. If personnel will be engaged in cutting of trees or other vegetation during ignition events, the Forest should require that personnel use only non-motorized cutting tools and do so only when it is safe to proceed without the use of motorized chainsaws. If trees need to be cut to ensure personnel safety, this should be done as much as possible prior to any ignition events. The MRDG indicates that with the use of chainsaws the crews in the Wilderness would be present for 1-3 weeks (depending on the alternative) and that without the use of chainsaws the crews would be present for “up to a month.” (MRDG, pp. 25, 32). Given the very slight reduction in the amount of time personnel will be in the field if they use mechanized and motorized equipment such as chainsaws and weed-eaters, which carry their own risk of fire ignition (which is not disclosed nor analyzed in the MRDG), the Forest should have selected Alternative 3, which authorizes fuels and vegetation treatments but prohibits the use of motorized or mechanized equipment. The Forest should prohibit the use of chainsaws and weed-eaters within designated Wilderness areas as a part of this project. [Objection, pp. 5-6]

**Response:** The objector contends that the MRDG was not available for review and comment, that it does not contain sufficient analysis, and that there is no need for the use of motorized or mechanized equipment in the designated wilderness area.

While there is no requirement for a MRDG to be provided for public review and comment, as a result of comment to the draft EA, a draft, unsigned MRDG was provided for information [Comment Response Table, p. 10]. Treatments authorized with this decision will be incremental across the entire project area, and timing, treatment, and location of treatments would be determined based on such factors as weather, limited operating periods, recent fire events, and available funding [EA, p. 4]. The Regional Forester must be briefed on the activities within the designated wilderness area and provide concurrence to proceed. The proposed activities in the designated wilderness area, including whether or not strategic use of any motorized and mechanized equipment is necessary to meet the minimum requirements for the administration of wilderness, will not be implemented without Regional Forester concurrence on those actions in that specific location and time [EA, p. 7].

The objector proposed that an alternative be analyzed that prohibits the use of mechanized and motorized equipment in designated wilderness and IRAs. The use of motorized and mechanized equipment in an IRA is not prohibited. With regard to wilderness, the EA and draft Decision Notice reflect that primitive, non-motorized tools will typically be used, and motorized tools will be used only when deemed necessary. Non-motorized and motorized tools could be combined to implement project activities within designated wilderness depending on circumstances at the time activities would move forward [EA, table 1, p. 4]. While non-motorized equipment will be preferred, the analysis of effects in designated wilderness considers the use of motorized equipment, including helicopters, chainsaws, and weed-eaters [EA, p. 7]. Use of these tools was used as the basis of the analysis of environmental effects and effects to wilderness character in order to consider the maximum range of potential effect. Analyzing for the use of motorized equipment does not preclude the use of non-motorized equipment. The draft Decision Notice reflects that the use of prohibited tools may be proposed where steep slopes, snags, and dense vegetation exists in order to minimize exposure to firefighters [draft DN, p. 8]. Whatever tools are used to implement project activities, design features such as feathering treatments near trails, avoiding leaving evidence of human activity in the wilderness, and the use of minimum impact suppression tactics have been included to minimize impacts [EA, p. 48].

## CONCLUSION

I appreciate the opportunity to further understand your concerns, and your letter generated further internal conversation around the activities being proposed and the decision to be made. I have reviewed the project in light of the issues you presented. The analysis considered a range of activities from no change in current management in the designated wilderness to the greatest potential impact to wilderness character from proposed activities. Authorization to use any normally prohibited tools for implementation rests with the Regional Forester. I am including the following instruction:

- Be clear in the Decision Notice that the responsible official intends to implement the overall project through the use of non-motorized and non-mechanized equipment to the extent possible in designated wilderness. The responsible official signing the Decision Notice only has authority to authorize the use of non-mechanized and non-motorized equipment at this time.

This project would be implemented incrementally over a timeframe greater than 20 years. Activities proposed within Mount Wrightson Wilderness where mechanized and motorized equipment may be needed would be briefed to the Regional Forester for their concurrence and may be subject to additional review or approval if required at that time.

My review finds that the project is in compliance with all applicable laws and the Coronado National Forest Land and Resource Management Plan. Once the included instruction has been addressed, the District Ranger may sign the Decision Notice. My review constitutes the final administrative determination of the Department of Agriculture; no further review from any other Forest Service or Department of Agriculture official of my written response to your objection is available [36 CFR 218.11(b)(2)].

Sincerely,

**X**

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KURT DAVIS  
Deputy Forest Supervisor

cc: Kerwin Dewberry, James Copeland, Dawn Dickman, Mindi Lehew, Lynette Miller,  
Roxanne Turley, Blair Halbrooks