



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

7-30-2009

Craig Wilcox
Coronado National Forest
Safford Ranger District
711 S. 14th Avenue, Suite D
Safford, AZ 85546

Subject: Draft Environmental Impact Statement (DEIS), Pinaleño Ecosystem Restoration Project, Coronado National Forest, Graham County Arizona (CEQ # 20090188)

Dear Mr. Wilcox:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. Based on our review, we have rated the Draft Environmental Impact Statement (DEIS) as Lack of Objections (LO) (see enclosed "Summary of Rating Definitions").

The proposed project would restore the fire-adapted ecosystem in the Pinaleño Mountains to protect and restore habitat for the federally endangered Mount Graham red squirrel. The proposed action (Alternative 2) is to manage vegetation on approximately 3,705 acres using a combination of silvicultural and fuels reduction treatments. The DEIS also evaluated a Mexican spotted owl emphasis alternative (Alternative 3) which would treat fewer acres, limit live tree thinning to trees less than 9 inches in diameter, and avoid treatments within Mexican spotted owl core areas. Alternative 2 is identified as the preferred alternative.

The project also proposes to amend the Coronado National Forest Land and Resource Management Plan to allow Christmas tree removal and public firewood gathering in the project area, and the DEIS states that these actions are also evaluated in the document. However, only in the cultural resources section was this evaluation apparent. We recommend that this element of the project be more fully evaluated in the Final EIS (FEIS). We also recommend that the cumulative effects of climate change on the project be discussed. Our detailed comments on these recommendations are enclosed.

EPA appreciates the opportunity to review this DEIS. When the FEIS is released for public review, please send one copy to the address above (mail code: CED-2). If you have

any questions, please contact me at (415) 972-3521, or contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

/s/

Kathleen M. Goforth, Manager
Environmental Review Office (CED-2)

Enclosure: Summary of EPA Rating Definitions
 EPA's Detailed Comments

cc: Marit Alanen, U.S. Fish and Wildlife Service

Impacts not fully assessed from Forest Plan amendments

The proposed action includes amending the Forest Plan to allow Christmas tree removal and public firewood gathering in the project area. The impacts of allowing these activities do not appear to be fully addressed in the Draft Environmental Impact Statement (DEIS). It is not clear where these activities would most likely occur and how many people the Forest Service expects would participate in these activities. Additionally, with the exception of the discussion of cultural resources (p. 187-188), it is not clear where the impacts from the addition of these activities are assessed. The DEIS notes that vehicle and foot traffic from recreationalists and wood gatherers often interrupts foraging and other behaviors by the red squirrel and Mexican spotted owl, with the potential to cause direct mortality to these species; however this is discussed in the cumulative impacts section (p. 114, 124), and seems to refer to wood gathering that is currently allowed for on-site recreational use. The addition of new public access and vehicle trips for the purposes of firewood gathering for off-site use would add to the impacts identified above. It is also not clear if the estimated traffic increases: 52-157% for Alternative 2, and 7-21% for Alternative 3 (p. 107, 129), include trips from Christmas tree removal and public firewood gathering activities.

Recommendation: Provide additional information in the Final Environmental Impact Statement (FEIS) regarding expected activity levels for Christmas tree removal and public firewood gathering in the project area. Include a discussion of how this increased vehicle and foot traffic would impact resources, including soils, water resources, and the red squirrel and Mexican spotted owl, given that existing recreational wood gathering can cause mortality to these species. Clarify whether traffic increase estimates include Christmas tree removal and public firewood gathering activities, and identify the assumptions used in these estimates. Include how these activities will be monitored for impacts and if the public will be educated regarding the presence of protected species.

Cumulative impacts from climate change not discussed

The DEIS does not mention potential effects from climate change on the success of the project nor indicate whether nor how these effects were considered in the project design. The recent U.S. Global Change Research Program report *Global Climate Change Impacts in the United States*¹ predicts that increasing temperature, drought, wildfire, and invasive species will accelerate transformation of the landscape in the southwestern United States. Information on the Arizona Department of Game and Fish website suggests a relationship between red squirrel populations and precipitation.²

Recommendation: In the FEIS, discuss the cumulative impacts from climate change on the red squirrel and the potential for these impacts to affect the success of the project. To the extent information is known, a discussion of the red squirrel's ability to adapt to a changing climate would be appropriate.

¹ Available: <http://www.globalchange.gov/publications/reports/scientific-assessments/us-impacts>

² http://www.azgfd.gov/artman/publish/article_554.shtml