

Decision Notice, with a Finding of No Significant Impact

**Wildland Fire Amendment to the Coronado National Forest
Land and Resource Management Plan**

**U.S. Department of Agriculture, Forest Service
Coronado National Forest
Cochise, Graham, Pima, Pinal, and Santa Cruz Counties, Arizona
Hidalgo County, New Mexico**

Background

The Coronado National Forest (CNF) Land and Resource Management Plan (Forest Plan) was approved in 1986 and amended over time. Its goals, standards and guidelines are derived from agency management policy in place at the time of its approval. The original Forest Plan's fire management direction is to "develop the most cost efficient operations for fire management activities depending on the resources, property, and lives to be protected". Under the current Forest Plan, suppression of wildland fire is the only choice available to Forest Service decision-makers, with the exception that wildland fire use is permissible in designated wilderness areas, wilderness study areas, and research natural areas.

In 1995, the U.S. Department of Agriculture and the U.S. Department of the Interior developed a joint-agency fire management policy, the *Federal Wildland Fire Management Policy and Program*; this policy was updated in 2001. Acceptance of the new policy rendered the CNF Forest Plan fire management direction outdated, thus, the CNF proposes an amendment to make the Forest Plan reflective of current Federal fire management policy. Planning for this amendment has focused on expanding the policy of total suppression to include an appropriate management response of either suppression or wildland fire use¹. The goal of the amendment is to assist Forest Service resource managers with the restoration of the natural fire cycle and its role in defining the vegetation and ecosystems of the CNF.

In May 2005, the CNF completed a National Environmental Policy Act (NEPA) review of the proposed action to amend the Forest Plan [Wildland Fire Amendment (WFA)] and an environmental assessment (EA) that publicly discloses the results of this review. The EA was prepared in accordance with the President's Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), and the environmental policy and procedures established in Forest Service Manual (FSM) 1950 and Forest Service Handbook (FSH) 1909.15. In the EA, the CNF documents the results of an analysis of the potential impacts of two alternatives: no action and the proposed action. Public involvement in the NEPA review commenced in January 2004 and has continued to date, including a 30-day public comment period on the scope of the NEPA analysis.

Based on my review of the EA and various reports and analyses contained in the Administrative Record² for this NEPA review, I am issuing this Decision Notice (DN), with a Finding of No Significant Impact (FONSI), and recommending approval of the proposed amendment to the Forest Plan to allow the use of wildland fire for resource benefits.

¹ This refers to the appropriate management response that allows naturally-ignited wildland fire to burn, with careful monitoring, to accomplish specific resource objectives.

² The EA, Administrative Record, and Forest Plan are available for public review at the Supervisor's Office, 300 West Congress Street, Tucson, AZ, 85701; telephone (520) 388-8300.

Decision and Rationale

After a careful and complete review of the impacts analysis reported in the EA, it is my decision to approve Alternative B (see below), which would amend the Forest Plan to allow both suppression and/or wildland fire use on a Forest-wide basis as an appropriate management response to wildland fire. As disclosed in the FONSI below, the environmental effects of implementing Alternative B would not be significant. In addition, the implementation of Alternative B would result in a non-significant amendment to the Forest Plan, pursuant to FSH 1909.12 §5.32. This decision meets requirements under the Forest and Rangeland Renewable Resources Planning Act of 1974 (RPA) as amended by the National Forest Management Act of 1976 (NFMA), and implementing regulations found in 36 CFR Part 219.

The WFA is a programmatic action that is not directly related to a specific project, and it would authorize no ground-disturbing actions. The WFA would grant managers the discretion to use wildland fire to achieve resource benefits and/or apply least cost suppression. Implementation of Alternative B would best satisfy the purpose of and need for the proposed WFA, which is to restore the natural fire regime on the CNF. The changes made by the WFA will immediately supercede the changes established in a previous amendment to the Forest Plan made in conjunction with a decision to approve implementation of the Peloncillo Fire Management Plan (PFMP)³.

The WFA would establish policy for 1,780,000 acres of National Forest System lands of the CNF in Southeastern Arizona and Hidalgo County, New Mexico. The WFA also has the potential to indirectly affect adjacent Bureau of Indian Affairs lands, National Park Service lands, and Bureau of Land Management lands; Arizona State Trust lands; State of New Mexico lands; and private land holdings within the Federal- and state-administered areas.

Fire management strategies would range from aggressive suppression (e.g., the use of aerial retardant) to no suppression (i.e., monitoring/managing wildland fire). Specific response actions would depend, in part, on the cause of the fire (human vs. natural), the risk to firefighters, public safety, time of year, location of the fire, direction of its potential spread, and current and expected fire intensity.

Implementation of Alternative B would achieve progress toward the following goals:

- * create a mosaic of vegetation and fuels that allows fire to resume its natural role in ecosystem function and fire-return interval;
- * restore historical biodiversity by the reduction of woody species density;
- * restore historical habitat characteristics;
- * improve wildlife diversity, with emphasis on special status species; and
- * improve watershed stability and hydrologic function by improving herbaceous plant cover.

Alternatives Considered

Two alternative fire management policies were evaluated: the proposed action and no action. A detailed description and comparison of alternatives is provided in Chapter 2 of the EA.

Alternative A: No Action

No action would continue the current Forest Plan fire management policy within two Fire Management Zones on the CNF, which were established based on resource-management objectives, with consideration

³ A DN with a FONSI was signed on April 29, 2005 by the Forest Supervisor approving implementation of the PFMP.

given to the value of property and resources to be protected. The appropriate suppression response in Fire Management Zone 1 is predicated upon preventing fires from reaching or damaging high value resources and improvements. In Fire Management Zone 2, the appropriate suppression response is predicated upon responses that will suppress wildland fires at the least cost with acceptable damage to improvements, and maintenance of sufficient forage to sustain livestock grazing operations and ground cover to keep watersheds in satisfactory condition” (p. 87, *Forest Plan*).

Alternative B: WFA Amendment to Forest Plan

The WFA would allow the use of wildland fire for resource benefits on a Forest-wide basis. When a natural ignition occurs, an appropriate management response of either suppression or wildland fire use would be considered based on a series of guidelines related, but not limited to, the following: cause, location, threats from fire, potential effects of the fire, risk from the fire, effects of other fire activity on management capability, consideration of external or other unanticipated issues and the potential for use of wildland fire to move the landscape toward the desired vegetation condition.

Public Involvement

In January 2004, a Scoping⁴ Report was distributed to a total of 657 individuals and organizations to inform the public of the project and to solicit comments on the scope of the NEPA analysis. Four written comment letters were received. Comments received in response to the notice were fully considered in the design of the proposed action. Disposition of public comments is described in the Administrative Record.

Public involvement in this NEPA review will continue with the distribution of this DN and FONSI to those who advised the CNF of their continued interest in the WFA and NEPA process. A legal notice will be published in the newspapers of record, the *Arizona Daily Star* and *Tucson Citizen*, that a DN with a FONSI has been signed by the CNF Supervisor.

Finding of No Significant Impact

The context of the proposed action is local, as its effects would be limited to the CNF and adjacent lands in southeastern Arizona and Hidalgo County, New Mexico. No regional, state-wide, national, or international impacts are foreseen.

After thorough consideration of the analysis reported in the EA and public comments received during a 30-day comment period on the scoping report, I have determined that approval of a proposed amendment to the Forest Plan to allow an appropriate management response (either suppression or wildland fire use for resource benefits) would not significantly affect the quality of the human environment. Therefore, an environmental impact statement is not needed. My determination is based on the following findings, which derive from the analysis reported in the EA and supporting technical reports contained in the Administrative Record.

⁴ Scoping refers to an outreach activity by which an agency seeks public comments on a proposed project, early in the NEPA review process, to assist in defining the “scope” of a proposed action, including potential issues, alternatives to the proposed action, and mitigation.

Air Quality

A managed wildland fire would temporarily degrade local air quality in the short-term, but would improve it in the long-term. The copious amount of smoke that is generated from the combustion of organic material, i.e., burning grasses and trees, can degrade ambient air quality over a given impact area. Particulates and gases contained in smoke may adversely affect respiratory function in humans and wildlife in the fire zone and downwind depending, in part, on the intensity of the burn, the distance over which the smoke is dispersed, and the relative sensitivity of the affected organism.

Potential effects of smoke on residents and special status species would be factored into each decision on whether or not to allow wildland fire use in a specific location. Each decision to burn or suppress would be based on resource-specific criteria. With regard to air quality, maintenance of national ambient air quality standards, which were established by the Clean Air Act to protect human health, would be one of the primary criteria used. The Forest Plan provides that all management practices will be planned so that air quality will meet local, State, and Federal standards.

Wildland fires likely to be managed for resource benefits would often be low-intensity fires that tend to produce less smoke than those of higher intensity. However, smoke from a managed wildland fire may in some cases be greater in duration in the short-term than a fire that is suppressed, because the fire may be allowed to burn longer for resource benefits. However, in the long-term, smoke effects of fires managed under the amendment would decrease and air quality would improve as vegetation in the ecosystem and natural fire cycle return to typical historic conditions. Implementation of the proposed action would return much of the landscape to historical fire-return intervals and would thus decrease the potential for catastrophic wildland fires and the massive amount of smoke that accompanies them.

Soils and Water Resources

Managed wildland fire would contribute to short-term increases in soil erosion and runoff containing ash and organic debris. These materials would temporarily degrade water quality in the streams within the watershed of the fire-affected areas by increasing suspended solids and turbidity, however, violations of water quality standards applicable to these water resources would not be expected. In the long term, soil stability and watershed conditions would benefit from implementation of the amendment, due to the decline in woody vegetation and the return of native grasses and forbs resulting from restoration of the natural fire cycle.

Vegetation

The net effect of amendment implementation on vegetation in the CNF would be positive. Implementation would not convert communities of vegetation to other types of communities on a large-scale. Instead, small-scale, localized conversions of vegetation would restore grasses and forbs to their historic ratio with woody vegetation in the ecosystem.

Decisions about management of wildland fire in riparian areas would be made to ensure that fuel loading is maintained at low levels so that low-intensity ground fires would predominate and the viability of older trees in the community would be protected.

Wildlife, including Special Status Species

The proposed action would not have a direct effect on the wildlife. There may be some short-term indirect effects on many CNF wildlife species as a result of the potential changes on the ground implemented from

the occasional use of wildland fire instead of suppression. However, the long-term effects of the amendment are expected to be beneficial to all species. The return to a more historical, natural fire regime would be expected to allow the CNF to receive the periodic, low-intensity fire disturbance needed to keep accumulated floor and ladder fuels in check. This would be expected to minimize the occurrences of high-intensity, potentially catastrophic events that could have serious adverse effects on most species and their habitats. In fact, the return to a more historic, natural fire regime may even restore habitat for species that have been extirpated from the CNF.

Typically, Forest Service projects that might affect species listed as endangered or threatened under the Endangered Species Act are subject to consultation with the FWS (FSM 2671.45) regarding potential environmental impacts to those species. In the case of any fire occurrence, however, consultation with the FWS is neither predictable nor possible. Thus, FWS consultation may or may not be required at the time decisions are being made to manage a wildland fire, depending on the location, time of year, presence or absence of threatened and endangered species, and whether or not management may affect threatened and endangered species. When a wildland fire occurs, emergency consultation would take place after site specificity is established and it is determined that management of the fire may impact Federally listed species. In many instances, there would be no need for consultation because there would be no substantial suppression actions or extensive human presence on the ground.

Heritage Resources

Adoption of the fire-management policy change in an amendment to the Forest Plan is not considered an undertaking as defined in the National Historic Preservation Act. Accordingly, the proposed action would have no direct effect on heritage resources.

Indirect effects of approval of the amendment may include the increased exposure of heritage sites to wildland fire, because a percentage of fires would not be quickly suppressed. However, such sites are more likely to be protected during a low- or moderate-intensity fire managed for resource benefit than during a high-intensity, catastrophic wildland fire, because decision makers would be aware of heritage resource concerns prior to a decision to allow a wildland fire to burn.

Suppression activities often involve ground-disturbing actions, particularly construction of control lines by hand or heavy equipment. Given the emergency nature of the situation, line construction often is done quickly, without the input of heritage resource specialists. As a consequence, sites may be at as much or greater risk of damage from suppression activities than they are from exposure to fire (this is particularly so with sites having only non-fire sensitive components).

If low- and moderate- intensity wildland fires are allowed to burn more often than in the past, there would be minimal adverse effects on prehistoric properties. Some heritage sites might be exposed to fire sooner than they would be if suppression continued to be the only fire management option. In the long term, such sites would be subject to increasingly greater risks of catastrophic fire damage as fuels continue to accumulate. Including the input of heritage-resource specialists in making fire-management decisions could largely mitigate the potential adverse effects of wildland fire use.

Visual Quality

The amendment itself would have no direct effect on scenic resources. Implementation of the amendment would likely result in more acres of low-intensity burned areas in the long term than the current suppression-only response. Therefore, indirect effects caused by the implementation of the new policy would be both negative (such as blackened landscapes) and positive (healthier forests, increased diversity of vegetation, and

lower risk of more damaging fires). Although fires managed for ecosystem benefits still result in blackened landscapes, the impacts are far less devastating than the types of catastrophic fire events that have played out across the West in recent years. Effects to viewsheds are more quickly recovered. Severe burns that result in a “moonscape” are less likely to reoccur after fire has returned to a more natural cycle and role in the ecosystem.

Recreation

The proposed amendment would not change Forest Plan direction for the management of recreation; therefore, its approval would have no direct environmental effects. However, indirect effects would result upon implementation of the wildland fire use strategy, both negative (such as changes to recreation settings and public access restrictions) and positive (such as healthier forests and lower risk of more damaging fires). Areas favored by recreational users would be impacted in the short term, but would return to a condition favorable for recreational use within the long term.

Community Resources

According to the *National Fire Plan* (<http://www.fireplan.gov/overview/whatis.html>), “Though wildland fires play an integral role in many forest and rangeland ecosystems, decades of efforts directed at extinguishing every fire that burned on public lands have disrupted the natural fire regimes that once existed. Moreover, as more and more communities develop and grow in areas that are adjacent to fire-prone lands in what is known as the *wildland-urban interface*, wildland fires pose increasing threats to people and their property.”

Managed use of wildland fire would assist in reducing unnaturally high fuel loads that contribute to catastrophic wildland fires. This would contribute to the return of fire to a more natural role in the ecosystem. The option to use wildland fire to achieve ecosystem benefits, such as fuels management under the proposed action, would reduce the potential for uncontrolled, catastrophic wildland fires in the long-term, which in turn would reduce economic impacts in the long-term.

Cumulative Impacts

Cumulative effects of implementation of the proposed amendment would be limited to the next three to five years, because the CNF Forest Plan is scheduled to be revised within that timeframe, and future fire policy will be governed by a revised Forest Plan. In the interim, during each interdisciplinary team review of a wildland fire occurrence, the potential for cumulative effects would be factored into each decision to authorize wildland fire use.

In such cases, the decision maker would consider the cumulative effects of allowing wildland fire use within a site-specific maximum manageable area (MMA) and the fire’s potential effects on current or proposed projects. For example, if a wildland fire occurs adjacent to a proposed trail construction project, then the potential impacts of wildland fire use on the project would be considered during development of the MMA.

Findings Required by Other Laws and Regulations

National Forest Management Act

Consistency with the Forest Plan

This decision to amend the Forest Plan is consistent with the intent of the Forest Plan's long-term goals and objectives. The proposed changes are additions to, alterations, or clarification of goals and existing standards and guidelines.

Significance Determination

It is my finding that the actions of this decision comply with the requirements of the National Forest Management Act of 1976 and NFMA implementing regulations in 36 CFR Section 219. This amendment is being made primarily in response to new information regarding Federal fire policy. I followed the direction found in 16 U.S.C. 1604(f)(4), 36 CFR 219, FSM 1922.5, and FSH 1909.12 (5.32) and determined that this is not a significant amendment to the Forest Plan because it does not meet the required definition of significance found in FSH 1901.12 (5.32). Details of the analysis that supports my determination concerning this amendment have been placed in the Administrative Record.

Endangered Species Act and National Historic Preservation Act

Refer to discussion under Finding of No Significant Impact heading (Special Status Species and Heritage Resources).

Opportunity to Appeal This Decision

This decision is subject to appeal pursuant to 36 CFR 217. A written notice of appeal must be filed in duplicate with the Appeals Deciding Officer, USDA-Forest Service Southwestern Regional Office, 333 Broadway SE, Albuquerque, NM 87102, within 45 days from the publication date of this legal notice in the *Arizona Daily Star*, and must meet content requirements specified in 36 CFR 217.9.

A Notice of Appeal must meet the requirements of 36 CFR 217.9, as follows:

- State that the document is a Notice of Appeal filed pursuant to 36 CFR 217;
- List the name, address, and telephone number of the appellant;
- Identify the decision about which the appellant objects;
- Identify the document in which the decision is contained by title and subject, date of the decision, and the name and title of the Deciding Officer;
- Identify specifically that portion of the decision or decision document to which the appellant objects;
- State the reasons for objecting, including issues of fact, law, regulation or policy, and, if applicable, specifically how the decision violates law, regulation, or policy; and
- Identify the specific changes in the decision that the appellant seeks.

If an appeal is filed, the Appeal Reviewing Officer will accept requests to intervene in the appeal from any interested or potentially affected person or organization for 20 days following the filing of the notice of

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appeal. Intervention will be allowed pursuant to 36 CFR 217.14.

Implementation Date

If no appeals are filed regarding this decision, the WFA may be implemented on the 7th business day following the close of the 45-day appeal period. If the Forest Service receives appeals on this decision, implementation will be allowed on the 16th business day following the completion date of the review and disposition of all appeals.

Point of Contact

Additional information about the Wildland Fire Amendment and this Decision Notice, with a Finding of No Significant Impact, may be obtained from Ms. Sherry Tune, Coronado National Forest, 300 West Congress Street, Tucson, AZ, 85701; telephone, (520) 388-8355. Regarding Forest Service appeals regulations and process, please contact Mr. Patrick L. Jackson, Regional Appeals Reviewing Officer, at (505) 842-3305.

/s/ Jeanine A Derby
JEANINE A DERBY
Forest Supervisor, Coronado National Forest

6/10/05
Date