



Via Web

June 16, 2017

Calvin Joyner, Regional Forester

USDA Forest Service

333 Broadway SE

Albuquerque, NM 87102

Email: objections-southwestern-apache-sitgreaves@fs.fed.us

RE: Corrected Objection to West Escudilla Forest Restoration Project

Pursuant to 36 C.F.R. § 218, the Center for Biological Diversity (“Center”) objects to the draft Decision Notice (“DN”) for the West Escudilla Forest Restoration Project (“project”) in the Alpine Ranger District of the Apache-Sitgreaves National Forests. On Oct. 7, 2015, the Center supplied timely written comment on a proposed action for the project. Also, the Center provided the Forest Service with timely written comment on the draft Environmental Assessment (“EA”). Previously, The Center may object per § 218.5. Legal notice of opportunity to object published in the *White Mountain Independent* newspaper and based on personal communications with the Forest Supervisor and Deputy Forest Supervisor the deadline for objection is June 16, 2017. Therefore, this objection is timely.

Project name: West Escudilla Forest Restoration Project

Deciding official: Forest Supervisor, Apache-Sitgreaves National Forests

Project location: Alpine Ranger District

Proposed decision: Proposed activities include vegetation treatments, prescribed fire, aquatic, and watershed activities on approximately 66,000 acres, including substantial acreage of group selection and intermediate thinning in Northern Goshawk PFA's and foraging habitat and shelterwood cutting in NGH foraging areas to deal with mistletoe.

Objector: Center for Biological Diversity

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Objector's interest

The Center is a non-profit, public interest organization headquartered in Tucson, Arizona, representing more than 50,000 members, many of whom reside in Arizona and maintain interests in the Apache-Sitgreaves National Forests. The Center's mission is to conserve and recover imperiled fauna and flora and their habitats through science, education, policy and law.

Members of the Center regularly use and enjoy, and will continue to use and enjoy the national forest lands located in the project area for observation, research, aesthetic enjoyment and other recreational, scientific and educational activities. Members of the Center will continue to research, study, observe

and seek protection for at-risk species associated with natural habitats found in the project area because they derive scientific, educational, conservation and aesthetic benefits from the existence of the full complement of native biological diversity found in the wild places of Arizona. Forest Service violations of law and policy in the project may cause significant adverse impacts to threatened and sensitive species and/or indicator species whose viability is of management concern. Agency violations of law and policy may degrade native vegetation and soil or habitat, food resources or populations of species whose viability the Forest Service is obligated to maintain. Direct, indirect or cumulative impacts of the project to the environment may harm the interests of the Center and its members in the conservation of nature and the recovery of wildlife.

Resolution

The reviewing officer may determine whether to discuss resolution. 36 C.F.R. § 218.11. Either the reviewing officer or the objector "may request to meet" and discuss resolution. *Id.* The Center will consider a request from the reviewing officer to meet and discuss this objection. In our view, a final decision implementing the project should:

1. Include updated language developed by the 4FRI Stakeholders Group designed to protect stands with mature/OG characteristics valuable to canopy dependent species (known as SPLYT stands - stands with a preponderance of large young trees). "SPLYT" stands are currently identified as those with a QMD of top 20 trees greater than 15" and 50BA or greater in trees 16" and larger on Site Class 1. These stands would receive treatment, where necessary, from least intensive prescriptions from the variety of prescriptive approaches proposed in the draft EA, in order to maintain large tree structure and higher levels of canopy cover.
2. Utilize alternative mistletoe treatment approaches being developed with the 4FRI Stakeholders Group that avoid overstory removal and removal of large and old growth trees.

Reasons

1. Including the "SPLYT" language offers clarification in response to comments and concerns addressing large tree protection and wildlife habitat protection. Additionally, including this language will bring the West Escudilla Restoration project in line with the mandate from the CFLRA to maximize the protection of large trees and help build consensus amongst the stakeholders group allowing agreement to include West Escudilla on the list of projects the stakeholders support for CFLRA funding.
2. Including the developing approach for addressing mistletoe offers clarification in response to comments and concerns addressing overstory removal and the protection of large and old trees. Additionally, including this language will bring the West Escudilla Restoration project in line with the mandate from the CFLRA to maximize the protection of large trees and help build consensus amongst the stakeholders group allowing agreement to include West Escudilla on the list of projects the stakeholders support for CFLRA funding.

Thank you for considering this objection. You may contact me at the email address or phone listed below.

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