

Date submitted (Mountain Standard Time): 8/7/2019 12:00:00 AM

First name: Michael

Last name: Casaus

Organization: The Wilderness Society

Title: New Mexico State Director

Comments:

July 10, 2019

Santa Fe National Forest

Attn: Hannah Bergemann, Fireshed Coordinator

11 Forest Lane

Santa Fe, NM 87508

Submitted via email to: Hannah.Bergemann@usda.gov

Re: COMMENTS ON SANTA FE MOUNTAINS LANDSCAPE RESILIENCY
PROJECT SCOPING DOCUMENT

Dear Ms. Bergemann:

Thank you for the opportunity to comment on the scoping document for the Santa Fe Mountains Landscape Resiliency Project (SFMLRP) in the Santa Fe National Forest (SFNF). While The Wilderness Society is generally supportive of the SFMLRP as currently envisioned, we have a few concerns that should be addressed in the environmental analysis and decision-making process.

First, we are concerned that the scoping document does not address how the SFMLRP will impact currently designated Wilderness, proposed wilderness management areas, or inventoried roadless areas (IRAs). Based on New Mexico Wild's analysis of GIS data for the proposed project area, there appear to be more than 23,500 acres of IRAs within the project area, comprised of portions of at least six discrete IRAs. As you know, IRAs in New Mexico's national forests are generally protected from road building and commercial logging by the 2001 Roadless Area Conservation Rule. Given that the project proposes no new road construction and sets a 12-inch diameter limit on thinning, the project appears to be consistent with the Roadless Rule. However, the Forest Service should explain why it considers the thinning activity to be consistent with one or more of the Roadless Rule's exceptions for tree cutting. The agency should also analyze the overall effects of the project (included prescribed fire) on the designated Wilderness, proposed wilderness, and IRAs in the planning area. Second, we are also concerned that the SFMLRP could adversely affect the wilderness evaluation and recommendation decisions during the SFNF's broader forest plan revision process, potentially excluding areas from being recommended as wilderness due to decisions made in the SFMLRP. Most of the IRAs included within the project area have been evaluated in the draft documents for the upcoming forest plan revision as containing high wilderness characteristics, and one IRA was evaluated as containing moderate wilderness characteristics. Again, we are concerned with the scoping document's complete lack of discussion of these areas should not be permitted or even considered before SFNF has completed its forest plan revision process and submitted its wilderness proposals to Congress. If SFNF makes a decision on the SFMLRP first, SFNF may exclude areas from protection in the forest plan which would otherwise qualify for wilderness management. At the very least, SFNF should clarify how the SFMLRP will preserve or enhance the wilderness characteristics of inventoried areas within the project area.

Third, while we support modeling treatments based on the guidance in GTR-3101 (which we regard as a good model), we question the statement in the scoping document that "20% of the forested areas in the Project Area would be identified, allocated and managed as old growth." This 20% old-growth target appears to be based on obsolete (pre GTR-310) thinking about the structure of historical ponderosa pine and mixed conifer forest. As noted in the scoping notice, old trees are scattered throughout the project area, and "old-growth structure" is now considered to have been the predominant condition in historical forests, maintained at a fine grain by fire. This characterization of historical conditions is consistent with the lessons of GTR-310. Thus, there seems to be a logical disconnect between GTR-310 and management direction in the forest plan. Instead of managing 20% of the project area as old growth, we recommend aiming to restore the entire project area to the kind of structure described in GTR-310.

Finally, we question why the Forest Service is proposing to thin in remote IRAs rather than investing its limited resources on reducing fuels and protecting infrastructure in the wildland-urban interface identified by the collaborative Community Wildfire Protection Plan, which was supported by the SFNF. The Wilderness Society generally supports increasing the pace and scale of science-based forest restoration, but we believe that reducing wildfire risk to communities must be land managers' top priority. The Forest Service should carefully evaluate wildfire risk and fuel reduction needs and opportunities in the WUI as part of any landscape-scale analysis and decision-making.

Thank you for considering our comments.



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First, we are concerned that the scoping document does not address how the SFMLRP will impact currently designated Wilderness, proposed wilderness management areas, or inventoried roadless areas (IRAs). Based on New Mexico Wild's analysis of GIS data for the proposed project area, there appear to be more than 23,500 acres of IRAs within the project area, comprised of portions of at least six discrete IRAs. As you know, IRAs in New Mexico's national forests are generally protected from road building and commercial logging by the 2001 Roadless Area Conservation Rule. Given that the project proposes no new road construction and sets a 12-inch diameter limit on thinning, the project appears to be consistent with the Roadless Rule. However, the Forest Service should explain why it considers the thinning activity to be consistent with one or more of the Roadless Rule's exceptions for tree cutting. The agency should also analyze the overall effects of the project (included prescribed fire) on the designated Wilderness, proposed wilderness, and IRAs in the planning area.

Second, we are also concerned that the SFMLRP could adversely affect the wilderness evaluation and recommendation decisions during the SFNF's broader forest plan revision process, potentially excluding areas from being recommended as wilderness due to decisions made in the SFMLRP. Most of the IRAs included within the project area have been evaluated in the draft documents for the upcoming forest plan revision as containing high wilderness characteristics, and one IRA was evaluated as containing moderate wilderness characteristics. Again, we are concerned with the scoping document's complete lack of discussion of areas with moderate or high wilderness characteristics. Uses which could degrade the wilderness suitability



of these areas should not be permitted or even considered before SFNF has completed its forest plan revision process and submitted its wilderness proposals to Congress. If SFNF makes a decision on the SFMLRP first, SFNF may exclude areas from protection in the forest plan which would otherwise qualify for wilderness management. At the very least, SFNF should clarify how the SFMLRP will preserve or enhance the wilderness characteristics of inventoried areas within the project area.

Third, while we support modeling treatments based on the guidance in GTR-310¹ (which we regard as a good model), we question the statement in the scoping document that “20% of the forested areas in the Project Area would be identified, allocated and managed as old growth.” This 20% old-growth target appears to be based on obsolete (pre GTR-310) thinking about the structure of historical ponderosa pine and mixed conifer forest. As noted in the scoping notice, old trees are scattered throughout the project area, and “old-growth structure” is now considered to have been the predominant condition in historical forests, maintained at a fine grain by fire. This characterization of historical conditions is consistent with the lessons of GTR-310. Thus, there seems to be a logical disconnect between GTR-310 and management direction in the forest plan. Instead of managing 20% of the project area as old growth, we recommend aiming to restore the entire project area to the kind of structure described in GTR-310.

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Thank you for considering our comments.

Sincerely,

Michael Casaus
New Mexico State Director, The Wilderness Society

¹ Reynolds, Richard T.; Sánchez Meador, Andrew J.; Youtz, James A.; Nicolet, Tessa; Matonis, Megan S.; Jackson, Patrick L.; DeLorenzo, Donald G.; Graves, Andrew D. 2013. **Restoring composition and structure in Southwestern frequent-fire forests: A science-based framework for improving ecosystem resiliency.** Gen. Tech. Rep. RMRS-GTR-310. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 76 p.