

Date submitted (Mountain Standard Time): 8/7/2019 12:00:00 AM  
First name: Thomas  
Last name: Jervis  
Organization: Sangre de Cristo Audubon Society  
Title: President  
Comments:  
June 26, 2019

James Melonas, Supervisor

Santa Fe National Forest (SFNF)

USDA Forest Service

11 Forest Lane

Santa Fe, NM 87508

email to: Hannah.Bergemann@USDA.gov

I have reviewed the scoping notice for the Santa Fe Mountains Landscape Resiliency Project (SFMLRP). Sangre de Cristo Audubon Society has a continuing interest in issues of forest ecology and in particular in the restoration and conservation of Ponderosa Pine and mixed conifer ecosystems. We have been engaged with the Forest Service on ecological management of the SFNF for more than 35 years. These comments largely echo comments we have submitted prior to this time but which do not seem to be considered in the SFMLRP scoping notice.

We have several concerns.

First, we are concerned about nesting birds. A project that cuts live trees during the nesting season will result in the total failure of all nests in those trees. Inasmuch as most of the trees in an area will be cut during the restoration activities, we believe that this work should not occur during the peak of the nesting season, specifically April 15 to August 1. Even those trees and shrubs that are not cut will be disturbed, resulting in reduced nesting success by many neotropical migrant songbirds. Since this also includes the peak of the fire season, avoiding the use of chain saws and other mechanical equipment (masticators) in the area during this period reduces the likelihood of ignition at a sensitive time.

Second, we are concerned with the possibility of soil compaction in the area. Soil compaction retards recovery of desirable grasses, forbs, and shrubs that are important for wildlife. We note that you will be offering fuelwood to the public in some areas.

While the use of small fuelwooders to perform this work has social benefits, we would prefer to see the use of tracked feller-bunchers in conjunction with forwarding equipment to remove both the fuelwood and the slash (see concern below) from the treated area. A central location where fuelwood could be collected by individuals would result in a more controlled area of compaction that could be remediated at the end of the project.

Third, we are concerned that the slash resulting from the thinning may remain on the ground for long periods of time prior to burning. Large quantities of green slash are likely to attract bark beetles, particularly in case of drought. This will lead to increased and unnecessary mortality in the remaining trees. If forwarding of the entire trees is not used as suggested above, we would encourage the piling and burning of slash as the project proceeds followed by a broadcast burn at the end of the project.

Fourth, we are concerned with the low number of snags in the Santa Fe National Forest generally. Snags are extremely important for many species of birds and other wildlife. There is a propensity on the part of fuelwooders to cut snags in the mistaken belief that they are "lightning rods" that ignite fires. Many snags also make particularly nice firewood on account of their pitch content. We urge you to make a concerted effort to conserve existing snags through education of the personnel involved and if necessary by the marking of snags and snag recruit trees. We note that dense duff can lead to the death of otherwise healthy mature trees during broadcast burns. While this is one means of snag recruitment, we do not support it.

Finally, we are encouraged that you plan long term maintenance of this area through a continuing fire use program. This would include monitoring of grazing pressure to ensure that adequate fine fuels remain to sustain appropriate flame lengths in subsequent fires so that those fires can return to their keystone role in the ecosystem. We look forward to a greater recognition of wildlife habitat needs and to working with you to achieve healthy ecosystems and a viable local economy. Please keep us informed of further actions on this project.

# *Sangre de Cristo Audubon Society*

June 26, 2019

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USDA Forest Service  
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Santa Fe, NM 87508

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Sincerely,



Thomas Jervis, President  
109 Daybreak  
Santa Fe, NM 87507