

June 29, 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

Dear Supervisor Melonas,

For more than a century, Audubon has built a legacy of conservation success by mobilizing the strength of its network of one million members and supporters, 450 local chapters, 41 Audubon centers, 23 state offices, and dedicated professional staff to connect people with nature and the power to protect it. A powerful combination of science, education and policy expertise combine in efforts ranging from protection and restoration of local habitats to the implementation of policies that safeguard birds, other wildlife, and the resources that sustain us all—in the U.S. and across the Americas.

Audubon New Mexico (ANM) is a state program of the National Audubon Society. At the national, state and local level in New Mexico and elsewhere we have supported agency actions that are aimed at improving habitat resiliency for birds and other wildlife in the face of a changing climate. Therefore we support the stated purpose of the Santa Fe Mountains Landscape Resiliency Project “to improve the ecosystem resilience of a priority landscape to future disturbances by restoring forest structure and composition and reducing the risk of catastrophic wildfire.”

Furthermore, as the landowner and manager of the Randall Davey Audubon Center & Sanctuary, 135 acres of piñon-juniper and pine woodlands in the Santa Fe fireshed, we greatly appreciate USFS taking actions to mitigate the risk of property loss resulting from catastrophic wildfire, by reducing fuel loads and returning a natural fire regime to this landscape.

In order to achieve the stated purpose of this project we encourage you to consider the following factors in the Environmental Assessment.

1. **Direct and indirect impacts on priority bird species in the project area** – The scoping document identifies the need to analyze the impacts on the Mexican spotted owl, a federally listed Threatened species, and the northern goshawk, a Forest Service Sensitive species. However, there are a number of other bird species that occupy these habitats and that have been identified by [New Mexico Avian Conservation Partners](#) as Level One Priority Species. These include Flammulated Owl, Juniper Titmouse, Pinyon Jay,

Virginia's Warbler, Grace's Warbler, and Woodhouse's Scrub Jay. We encourage USFS to take these additional species into account when analyzing the potential effects of treatments, giving special consideration to the potential for direct mortality resulting from thinning and burning treatments conducted during the nesting season and the indirect impacts of reduced habitat availability for species with specific habitat needs (e.g. Pinyon Jay are colonial nesters who select closed canopy pine stands for nest sites and maintain high site fidelity to these locations year after year). We encourage you to include these species in baseline data collection and ongoing monitoring efforts in order to inform decision-making regarding timing and location of treatments.

2. **Soil compaction resulting from use of heavy equipment** – Creating more open, savannah like conditions will encourage the growth of early-successional plant species that are valuable to a number of bird species as well as other wildlife. However wide spread soil compaction has the potential to limit the growth of these plant communities. We encourage you to analyze the differing effects of the various types of equipment employed as they relate to the potential for soil compaction.
3. **Benefits of retaining snags and downed logs** – While removing ladder fuels and reducing overall fuel loads is an important step in mitigating the risk of catastrophic wildfire, dead timber (both snags and downed logs) can provide important habitat components to a number of bird and other wildlife species. We encourage you to analyze the possible alternatives as they relate to the retention of snags and downed logs, with the goal being to leave these features on the landscape whenever appropriate.

We would appreciate you taking the listed factors into consideration when conducting the Environmental Assessment and preparing the Environmental Impact Statement (if warranted). We would also encourage you to continue the collaborative approach to forest planning embodied by the Greater Santa Fe Fireshed Coalition.

Thank you for your work to improve the resiliency of the Santa Fe National Forest. Please keep us informed of further actions.

Sincerely,



Jonathan Hayes
Vice President and Executive Director
Audubon New Mexico

Cc: Tom Jervis