

Date submitted (Mountain Standard Time): 8/7/2019 12:00:00 AM  
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Comments:  
July 23, 2019

James Melonas, Forest Supervisor?  
Hannah Bergemann, Fireshed Coordinator

Santa Fe National Forest Supervisor's Office  
11 Forest Lane, Santa Fe, NM 87508

Re: Santa Fe Mountains Landscape Resiliency Project

Submitted via email to comments-southwestern-santafe@fs.fed.us and  
Hannah.Bergemann@usda.gov

Dear Supervisor Melonas and Fireshed Coordinator Bergemann,

I hope you will give consideration to the comments on the landscape resilience project that were due by mid-July of 2019. I know the comment period for this project has passed, but I was not on the mailing list to receive the materials I would have needed to comment. However, I have read the comments submitted by Joe Trudeau from the Center for Biological Diversity (CBD), and while I may not endorse all of the points he made, I would like to express my agreement with many of them.

As a background, you should know that I have been a member of the SW Jemez CFLRP since June of 2012 and also the Zuni Mt. CFLRP since November of 2012. I have attended many partners meetings and field trips for both projects, and have seen first hand what a range of restoration projects look like. I have also seen planned restoration projects in the Kaibab National Forest, working with a Nature Conservancy planner at the Hart Prairie Preserve site in September of 2018. Additionally, I attended the Common Ground in Fire Ecology Workshop - Fire and Northern NM forests - about a restoration proposal for the Santa Fe watershed in April of 2019. This workshop had 4 experts in restoration and watershed health, who presented their research on restoration, including Matt Hurteau, who works at UNM's Department of Biology. Dr. Hurteau's work focuses on the influence of climate and disturbance on forest productivity and species distributions across space and time, including climate change mitigation and adaptation in forest ecosystems.

The most important point that I support from the CBD's comments is the need to move from the GTR310 model in favor of Dr. Hurteau's model. I support the 3 tier management plan that is outlined on pages 48-52 of the CBD's comments. Given the difficulty of doing mechanical thinning on a substantial amount of the forest, this model uses fire more effectively for the restoration of a larger amount of acreage. I found it significant that research supports modest areas of high intensity fire, and that the outcomes from medium intensity fire can be more effective for restoration than is low intensity fire done after mechanical thinning. I support the CBD's ask on page 52 of their document - "We therefore request the USFS to analyze the Strategic Treatments for Fire Use Alternative as a standalone alternative in any subsequent NEPA document."

I read with interest the comments on grazing in recently thinned and burned areas. I support the CBD's assertion on pages 15-20 and 76-77 that grazing should not be permitted in these areas for at least 5 years. I also believe that riparian habitats should be excluded from any grazing, whether that means fencing off the riparian areas or changing permitted areas to keep livestock out throughout the year. Just limiting cattle to a shorter amount of time in riparian areas is not acceptable. The damage is too severe in the sky island areas of public lands in New Mexico, including on the Santa Fe NF. I have observed this first-hand in a riparian habitat in the Zuni Mountains that my husband and I have owned for the past 40 years that has not been grazed.

Additionally, I support the guidelines on page 68 of the CBD document for establishing a complex early seral forest. These attributes should be the direction restoration should take for the Santa Fe NF. As the CBD document states, "The common attributes of complex early seral forests include:

- [bull] Abundant and widely distributed large trees, snags and downed logs?
- [bull] Varied and rich understory flora?
- [bull] Varied and rich floral invertebrate, avian and mammalian species composition
- [bull] Highly complex structural complexity with many biological legacies?
- [bull] Complex and functional below-ground biological processes?
- [bull] Complex and varied genetic diversity?
- [bull] Rich ecosystem processes including pollination and predation?
- [bull] Low susceptibility to invasive species

?[bull] Varied and complex disturbance frequency?

[bull] High landscape integrity with shifting mosaics and disturbance dynamics?

[bull] High resilience and resistance to climate change due to varied and complex genomes."

Finally, there is one more comment by the CBD that I think is important. On page 55 of their document, in the first paragraph, last sentence, they discuss the consequences of dramatic canopy reduction that I have seen occasionally in both the SW Jemez CFLRP and the Zuni Mt. CFLRP, which is that this reduction causes substantial soil heating and drying, which is certainly not productive for a healthy watershed.

I appreciate your time and attention in this matter, and also hope that you will take the comments by the Center for Biological Diversity seriously. They are well documented and supported, and deserve your time and attention.