

Date submitted (Mountain Standard Time): 7/10/2019 12:00:00 AM  
First name: Rachel  
Last name: Jankowitz  
Organization: Native Plant Society of NM  
Title: Conservation Chair  
Comments:  
Please find attached the comments of the Native Plant Society of NM.

Santa Fe National Forest

Re: Santa Fe Mountains Landscape Resiliency Project

This letter is in response to your request for public comment on the scoping document for the above referenced project. The purpose of the project is to improve the ecosystem resilience of a priority landscape to future disturbances including wildfire, climate change, and insect outbreaks. This comment is submitted on behalf of the Native Plant Society of NM (NPSNM), a non-profit organization with approximately 900 members in seven chapters located around the state and in El Paso, Texas. Our mission is to educate the public about native plants by promoting knowledge of plant identification, ecology, and uses; foster plant conservation and the preservation of natural habitats; support botanical research; and encourage the appropriate use of native plants to conserve water, land, and wildlife.

NPSNM would like to express our support for the component activities of thinning, controlled burning, riparian restoration, and road improvements and closures, in support of forest resiliency. We are also pleased to learn that this project results from cooperative interagency planning by the Greater Santa Fe Fireshed Coalition. However, the scoping document raises several questions and concerns that should be addressed in the Draft Environmental Impact Statement (DEIS).

1. How is the Fireshed boundary defined? And, how was the Project Area selected?
2. The spruce-fir forest type is not adapted to frequent fire, and normally occurs as even-age stands with only small incidence of disturbance. We 3. On page 10, the scoping document discusses the desired effect to "stimulate the growth of an herbaceous understory that provides forage". It is important that the increase of forage for wildlife not be entirely negated by increased livestock grazing. This issue should be addressed specifically in the DEIS, since there is a segment of the public who are suspicious that Forest Service motives are driven entirely by a desire to benefit grazing on public lands.
4. On page 11, the document mentions site-specific "applicable resource protection measures" that will be followed when planning treatments. While these measures will necessarily be customized for each treatment, it is important that the DEIS list the measures that maybe considered in each case. NPSNM especially urges the Forest Service to identify, and where necessary conduct surveys for, the locations of rare plant species and their habitat, and avoid adverse effects to rare plants.
5. Riparian restoration practices that involve removal of non-native elm, olive, tamarisk and Tree-of-Heaven, should only be approved where funding and plans are in place to re-treat with chemical controls for at least three years. Cutting these species without follow-up treatment will only lead to a worse infestation through re-sprouting.

Thank you for providing this opportunity to contribute scoping comments on the resiliency project. We look forward to reviewing the DEIS when it becomes available.

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