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Title: New Mexico Water and Habitat Lead

Comments:

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James E. Melonas

Forest Supervisor

Santa Fe National Forest

11 Forest Lane

Santa Fe, NM 87505

CC: Hannah Bergemann, Fireshed Coordinator

RE: Scoping Comments on the Proposed Action for the Santa Fe Mountains Landscape Resiliency Project Environmental Assessment

Dear Mr. Melonas,

Please accept the following scoping comments from Trout Unlimited (TU) regarding the proposed Santa Fe Mountains Landscape Resiliency Project (SFMLR) Environmental Assessment (EA). We understand the purpose of this project is to improve forest and watershed health in the treatment area through a combination of non-commercial forest treatments, prescribed fire, riparian restoration, and road improvement and decommissioning. We agree with you that this work is necessary to improve ecosystem health and resiliency in the greater Santa Fe area.

Project Purpose and Need

We agree with the purpose and need for this project, specifically that there is a need to create safe conditions for the reintroduction of fire, to improve and maintain diverse wildlife habitats, and to improve watershed and riparian area conditions. As stated in the scoping document, 9 of the 10 HUC 12 subwatersheds are "functioning at risk". The management actions proposed in the SFMLR scoping document can improve watershed function, reduce the risk of catastrophic wildfire, and benefit fish and wildlife species.

By improving forest health and the quality of riparian habitat, native species will benefit, including at-risk species. As noted in the 2019 Santa Fe National Forest Draft Land Management Plan (DLMP), there is a need for restoration and maintenance of ecological conditions that contribute to the recovery and conservation of federally listed species (threatened and endangered) and maintain viable populations of the species of conservation concern. Riparian areas play a critical role in the life-cycle of many species found on the SFNF, including both aquatic and terrestrial species, and we urge you to make riparian area restoration a key component of this project. As noted in the DLMP, riparian areas occupy less than 3 percent of the Santa Fe National Forest but provide some of the most important and biodiverse habitats and are critical for providing ecosystem services to downstream communities.

Trout Unlimited appreciates your efforts to responsibly analyze, plan, and implement the restoration of frequent fire adapted ecosystems. Restoration that is anchored in science and reintroduces low to moderate intensity fire is severely needed in this landscape to avoid the potentially devastating effects on forests, wildlife, fish, and water resources. We are confident that the environmental assessment will adequately assess the proposed actions and recognize a thorough assessment as a necessary step in building public trust in this project.

Riparian Areas, Stream Function, and Native Species

Trout Unlimited has several suggestions for the EA to consider for improving riparian habitat and watershed resiliency to the benefit of native species in the SFMLR:

1. Prioritize restoration projects based on watershed condition, riparian habitat and stream function, at-risk species, partner interest, and other immediate needs.

2. Assess opportunities to benefit trout and native species through forest and riparian area restoration, including potential expansion habitat for Rio Grande cutthroat trout (RGCT).
3. Consistent with the draft management plan, riparian management zones should be identified within SFMLR treatment areas and management activities in riparian areas should only be implemented to maintain or restore the diversity of native riparian plant species and vegetation structure, and to improve or maintain aquatic habitat and stream function.
4. Identify opportunities to address the impacts of chronic headcutting and channel incisions.
5. Identifying opportunities to increase the quantity and duration of stream flows through combined forest, riparian, and stream restoration techniques.
6. Consider naturalization and obliteration as alternatives to road decommissioning in riparian management zones and where long-term sedimentation concerns exist.

We are particularly interested in riparian areas that will be targeted for restoration under this proposal. We agree that conifer encroachment into riparian areas presents a heightened fire risk and that treatments could help restore native riparian vegetation such as cottonwoods, willows and alders, but management activities in riparian areas should be done with the sole purposes of improving the quality of riparian and aquatic habitat. Along with vegetative restoration, we see a need to address chronic headcutting, channel incision, and floodplain connectivity. We believe there are opportunities to address floodplain connectivity issues in the southern part of the project area, including Apache Canyon, Galisteo Creek, and Arroyo Hondo. With proper restoration work, we believe there is potential to extend surface flows throughout the year in places like Apache Canyon. We hope that EA will identify opportunities to reduce headcutting and channel incision, restore floodplain connectivity, and increase stream flows through restoration treatments.

Many of the streams in the SFMLR project area, notably Rio en Medio and Big Tesuque Creek contain viable trout populations as well as potential expansion habitat for RGCT. Trout populations are vulnerable to the impacts of high intensity fire and associated impacts to streams and water resources and will benefit from forest treatments designed to reduce conifer encroachment, restore native species, and reduce sedimentation from roads and chronic headcutting. Therefore, we encourage the Forest Service to identify these opportunities to benefit trout and native fish species in the EA.

We appreciate your recognition that roads and trails can impair water quality and riparian function, thus harming native species like RGCT, by channelizing water and contributing to erosion and sedimentation. The proposed project provides an opportunity to address road and trail impacts and move toward desired conditions for properly functioning road and trail systems with limited sedimentation and impacts to water quality and native species. We support the road improvement, closure, and decommissioning treatments in the project area and believe it will result in natural resource benefits. Where roads have been previously determined to be unnecessary, especially in riparian management zones and where long-term sedimentation concerns exist, we encourage you to consider naturalization/obliteration as an alternative to decommissioning, as this could result in a larger benefit to riparian habitat composition and function and associated benefits to water quality.

Finally, in your analysis of the impacts of road improvements, we ask that you consider all of the potential impacts from improvement of forest roads, including those associated with increased vehicular traffic, changes in forest recreation, and other associated impacts that an altered road system can have on forest resources, including negative impacts on fish and wildlife.

Summary

In conclusion, we appreciate this opportunity to participate in this planning process for the SFMLR and thank you for the consideration of our suggestions and input. We hope the planning team finds our comments helpful and we remain available to answer any questions you may have. We look forward to working with the Santa Fe National Forest throughout the development and implementation of this project to ensure it results in healthier watersheds and ecosystems that are resilient to changing climate conditions, to the benefit of both native fish and the public.