

July 10, 2019, RESUBMITTED 7/14/19

TO: comments-southwestern-santafe@fs.fed.us

James Melonas
Supervisor, Santa Fe National Forest
11 Forest Lane
Santa Fe, NM 87508

Re: Santa Fe Mountains Landscape Resiliency Project

Dear Supervisor Melonas:

As members of the public, we respectfully submit comments to the U.S. Forest Service concerning the Santa Fe Mountains Landscape Resiliency Project (SFMLRP), spanning approximately 50,566 acres located within the Espanola and Pecos/Las Vegas Ranger Districts on the Santa Fe National Forest. Please add our names to the contact list to receive future public notices regarding this project and please send us an acknowledgement of these comments.

Please consider the following comments regarding this project:

1) The public is asked to comment on a project of great magnitude for which the Forest Service has supplied an inadequate map, which does not include existing Inventoried Roadless Areas (IRAs). These areas are Federally designated, protected and potential Wilderness. They are shown on the attached map entitled "*SF Front Country – Watersheds, fire history, IRAs.*"

The Santa Fe National Forest has provided a map to the public which excludes IRAs and when questioned about this omission, we were told that the Forest "did not have that information in their GIS datasets." Yet this information is clearly available to the Forest Service on maps and, whether or not it was intentional or due to ignorance, they chose not to make this information available to the public during scoping.

We vigorously object to the current, misleading map of the project. **The map must be revised to clearly include the IRAs and the scoping period extended accordingly so that the public is aware of the existing IRAs and can comment accurately.**

2) The Santa Fe National Forest is currently in the process of revising the Forest Plan. The SFMLRP scoping period and SFMLRP project is not suitable at this time, it may be contradictory and **should be delayed until after the Revised Forest Plan is formally adopted.**

3) The SFMLRP is subject to an Environmental Impact Statement (EIS). The Ninth Circuit reaffirms that logging in roadless areas is irreversible and irretrievable. That means an EIS must be done. **A key question is: What are the impacts for logging and roadbuilding?**

4) The 50,566 acres of the SFMLRP is currently critical wildlife habitat and provides extensive, necessary connectivity. This habitat is now intact and will be negatively affected by the project. **Have surveys been conducted in the project area by a qualified biologist and when were those surveys done? What is the plan for habitat analysis? How will the Forest Service monitor the effects of the projects and what impacts the treatments would have on existing wildlife?**

5) There are Endangered Species in the project area including Mexican Spotted Owl, Rio Grande Cutthroat Trout and the Goshawk, a Species of Greatest Concern. **Have surveys been conducted and studies of the adequacy of the habitat before the project begins? What is the monitoring protocol, particularly regarding Protected Activity Centers (PACs)?**

6) Research shows the necessity for connectivity and the impacts roads have on wildlife. There is extensive research showing that roads result in erosion and damaged soils. **What are the plans for decommissioning temporary roads created by the lumbering operation? And how will the roads within IRAs be used?**

7) Please include an action alternative that does not log in the IRAs. Also an alternative that meets soil, habitat and watershed objectives.

8) The 2001 Roadless Rule clearly states the conservation aim "the intent of this final rule is to provide lasting protection of inventoried roadless areas within the National Forest System." To achieve this, the rule was structured "to immediately stop activities that pose the greatest risks to the social and ecological values of inventoried roadless areas" which include restrictions on "road construction, reconstruction, and timber harvest." We ask the Santa Fe National Forest to provide reasons for an exception to the Roadless Rule, which has been granted by the Regional Forester. This rule has been upheld by the courts many times but this time the Forest Service appears to have created its own rule.

We thank you for your consideration of our comments. We look forward to working with you on management activities in the Santa Fe National Forest.

Sincerely,



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Attachment: Maps