

Santa Fe Mountains Landscape Resiliency Project

Draft Environmental Assessment

Public Comment Period Content Analysis and Response



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1.0 Introduction

The U.S. Department of Agriculture, Forest Service (Forest Service) developed a public involvement strategy in compliance with National Environmental Policy Act (NEPA) regulations in order to educate the public and interested parties about the Santa Fe Mountains Landscape Resiliency Project (SFMLRP or project), receive their input, and identify public concerns. The process consists of the following public involvement milestones: public scoping period, release and review of the draft environmental assessment (EA), public comment period for the draft EA, release of the final EA, and publication of the Decision Notice/Finding of No Significant Impact.

The scope of this report is to summarize and respond to public comments received for the draft EA released for public review in September 2021.

2.0 Draft Environmental Assessment Public Comment Period

A public notice was placed on the Forest Service website for this project on Monday, September 13, 2021 (<https://www.fs.usda.gov/project/?project=55088>), notifying the public of the comment period for the Santa Fe Mountains Landscape Resiliency Project Draft Environmental Assessment.

The Santa Fe National Forest held two virtual public meetings during the public comment period for the Santa Fe Mountains Landscape Resiliency Project Draft Environmental Assessment, on Wednesday, October 6, 2021, and Thursday, October 14, 2021.

The Forest Service received 123 public comment letters during the draft EA public review period. Input received in writing helps the Forest Service identify environmental concerns and/or impacts to be addressed in the final EA, new design features to be considered for resource protection, and potentially new or different project alternatives. The final EA incorporates responses to all substantive public comments received on the draft EA.

3.0 Methods for Public Comment Collection and Analysis

The Forest Service has reviewed all comments received through October 29, 2021, and these are summarized in this report.

The Forest Service collected comments using three methods: an online Internet form via the Forest Service's Comment and Analysis Response Application (CARA), email, or regular postal mail.

Original letters were encouraged to be mailed to the following address:

Santa Fe National Forest, Española District Office
18537 US 84/285, Suite B
Española, NM 87532

All comments received by the Forest Service were uploaded to the Forest Service's CARA. The Forest Service Interdisciplinary Team downloaded all public comments from CARA to review and code each comment letter (Appendix A). At the completion of comment coding, CARA was used to create reports

that categorized the various comment types and to synthesize the submitted information presented within this report.

Throughout the comment entry and coding process, the Interdisciplinary Team completed quality assurance/quality control (QA/QC) checks to ensure that all comments were entered correctly and accurately.

3.1 Summary of Public Comments

In total, 123 comment letters were received during the draft comment period beginning September 29, 2021 and ending October 29, 2021. Individuals and organizations that submitted comment letters are listed in Appendix B.

The Forest Service identified 444 individual comments contained within the comment letters (excluding duplicates). A summary of the public comments received and organized by concern, issue, or resource topic is presented in Table 3-1, in order from the greatest number of comments received to the least number of comments received. It is possible that comments addressed multiple topics; therefore, comments may be included in multiple topics below.

Table 3-1. Summary of Draft Environmental Assessment Comments Received, by Topic

Topic	Number of Comments
Soil, Water, and Riparian Resources	6
Air Quality, Wildfire, Wildland/Urban Interface	70
Vegetation Communities	26
Wildlife, Special-Status Species	33
Cultural Resources	1
Public Involvement	25
NEPA Process	5
Climate Change	6
Grazing	4
Inventoried Roadless Area	16
Visual Resources	4
<i>Comments Not Relevant to the Decision</i>	248
Total	444

4.0 Public Comments Received

4.1 Project Support

Two comments (contained in letter numbers 12 and 14) support the Proposed Action as presented in the draft EA.

Response: Thank you for your comments and your support for the Santa Fe Mountain Landscape Resiliency Project. We appreciate your interest and participation in the planning process.

4.2 Comments Not Relevant to the Decision

There were 248 comments that were, in whole or in part, not relevant to the decision process because the comment was non-substantive or out of scope. The Forest Service will not develop responses to these non-substantive or out-of-scope comments. The portions of these comments that were substantive and relevant are discussed below in Section 4.3.

4.3 Project Concerns and Responses

Topic 1: Soil, Water, and Riparian Resources

Theme 2-1: Soil

Three comments (contained in letter numbers 90, 91, and 131) expressed an interest in further analysis of the potential effects of vegetation thinning and prescribed fire on soil ecology, including impacts such as soil erosion and loss of resilience. One comment expressed concerns over the potential loss of soil nutrients from runoff and use of prescribed fire. Another comment outlined the risks to soil integrity from erosion and to water quality for runoff during seasonal rains as a consequence of the thinning treatments.

REPRESENTATIVE COMMENT(S):

- *The plan targets 20-30% of the Canada Forest as a potential thinning area, which burning will affect not only the La Canada area, but all of Santa Fe, and our watershed. As has been evidenced in other parts of the state, the burns kill not only understory, small and medium sized trees and scorch larger trees, but will also damage or destroy the soil's nutrients and capacity for recovery. You propose to burn every 5-15 years, a time period that current ecological science says won't be long enough to allow either understory or soil ecology to recover, especially during a 100-year drought. [...]*

Theme 2-2: Water and Riparian Resources

Three comments (contained in letter numbers 114 and 130) expressed an interest in further analysis of the potential effects of vegetation thinning, prescribed fire, and herbicide use for vegetation management on riparian resources and water quality. One comment expressed concerns regarding the toxicity of herbicides and their potential adverse effects on aquatic and riparian species. Another comment questioned whether the proposed treatments were in alignment with natural disturbance regimes within the project area, and whether the treatment were adequately based on current knowledge of riparian habitat.

REPRESENTATIVE COMMENT(S):

- Given the stresses of a warming and drying climate, it is hard to understand why herbicides would be applied that may have even low toxicity levels to fish and other aquatic species, or that may potentially damage native vegetation species during application. Exhibit 7. The Forest Service here fails to provide any meaningful analysis or demonstrate the herbicide use will not have adverse effects on aquatic or riparian species. The omission is a fatal flaw in the analysis and at bottom demonstrates the uncertainty inherent in the agency's proposed actions. The Forest Service states that "The abundance of conifers in riparian corridors is uncharacteristically high at the expense of deciduous trees and shrub-herb vegetation. Exotic woody species are undesired within all riparian ERUs and currently include localized populations of Russian olive (*Elaeagnus angustifolia*), Siberian elm (*Ulmus pumila*), and other invasives. " EA at 139. However, the table "Outlook for Likely Effects of Proposed Action" states, in regard to exotic woody species: "No effect. Project is not likely to decrease the current amount of exotic woody species." EA at 50. More clarity is needed as to whether utilizing herbicides will have the desired effect, or not.*
- The proposed action for riparian restoration suggests a mindset that considers it possible to redesign the ecosystem through fairly heavy-handed human ecological engineering. This approach creates challenges in even identifying the potential cumulative impacts, much less analyzing them. Given the uncertainty of the riparian treatments proposed, and the extent that such treatments will be in opposition to natural trends related to our warming and drying climate, the best approach is very light-handed, targeted and strategic restoration that works with current climatic trends instead of against them. The analysis and planning to accomplish this should be done in the context of an EIS.*

RESPONSE:

Potential impacts to soil, water, and riparian resources are discussed within SFMLRP EA Section 3.6, Watersheds and Hydrology, and Section 3.7, Riparian Resources. A summary of these potential impacts from the No Action Alternative and Proposed Action can be found in EA Section 2.4, Comparison of Alternatives (see EA Table 2.9). The reader is referred to EA Section 3.6, where impacts to soil productivity, watershed flow, and water quality are disclosed. Furthermore, EA Section 3.7 discusses impacts to seral state diversity, riparian woody regeneration, coarse woody debris, and other impact indicators associated with watershed health. Additional information regarding how project activities under the Proposed Action would be implemented can be found within EA Appendix C, Design Features, Best Management Practices, and Mitigation Measures.

Appendix C describes best management practices, project design criteria, and mitigation measures that would be implemented to mitigate potential adverse impacts to soil, water, and riparian resources and guide implementation to achieve desired conditions. Water-2 through Water-4 are intended to maintain water quality; Water-5 and Water-6 are intended to minimize noxious weed spread and reestablish native vegetation; Water-7 through Water-11 and Rx-1 through Rx-10 are intended to minimize soil erosion, promote soil productivity, and maintain water quality; Thin-1 through Thin-10 are intended to maintain water quality, minimize soil erosion, maintain and reestablish vegetation, and maintain streambank stability; Soil-1 through Soil-8 are intended to minimize soil erosion and maintain soil productivity.

The difference between reference conditions and desired conditions are explained within the EA in Section 1.3. Desired conditions use historical ecology within the context of historic range of variability in each vegetation type, in addition to social and economic considerations, as a template for management

action. Reference conditions provide a best estimate of a functional and sustainable system, and are a useful basis for developing desired conditions while accounting for uncertainties (e.g., climate change). Restoration may not necessarily return an ecosystem to its former state, because contemporary constraints and conditions can cause it to develop along an altered trajectory (Clewett et al. 2005; Pilliod et al. 2006).

EA Section 3.7.1, under Riparian Resources, describes conifer abundance in riparian areas within the SFMLRP project area as substantially exceeding the characteristic canopy cover of the ecological reference model identified in the Santa Fe Terrestrial Ecological Unit Inventory (U.S. Forest Service 1993). Overall seral state diversity is moderately departed from desired conditions with an excess of late seral plant communities and lack of riparian obligate regeneration. The abundance of conifers in riparian corridors is uncharacteristically high at the expense of deciduous trees and shrub-herb vegetation.

Exotic woody species are undesired within all riparian ecological response units (ERUs) and currently included localized populations of Russian olive (*Elaeagnus angustifolia*), Siberian elm (*Ulmus pumila*), and other invasives. The Proposed Action has been revised to no longer include herbicide application. However, as provided in design feature Plant-7, if deemed necessary for successful riparian restoration, herbicides would be applied to non-native species within riparian areas in a manner that is consistent with the *Santa Fe National Forest Invasive Plant Control Project Record of Decision* (SFNF Invasive Plant Control Project ROD) (U.S. Forest Service 2018b).

EA Section 3.2.2, under Vegetation Communities, describes limits to sizes of trees that may be removed. The Proposed Action is not anticipated to have a substantial effect upon old growth (as defined by the Santa Fe National Forest Land Management Plan, as amended [Forest Plan]) or large trees within the project area. The Proposed Action includes a "diameter cap" of 16 inches diameter at breast height (dbh) for "forest species" and 12 inches dbh for "woodland species." Given these limits, no large tree would be removed by thinning or mastication operations.

Topic 2: Air Quality, Wildfire, Wildland/Urban Interface

Theme 2-1: Effects of Smoke

Twenty-five comments (contained in letter numbers 9, 23, 28, 37, 43, 44, 46, 47, 51, 52, 62, 77, 85, 92, 98, 101, 107, 111, 116, 121, 122, 123, 126, 130, and 134) expressed concern that smoke resulting from prescribed fire may impact air quality and consequently adversely impact public health.

REPRESENTATIVE COMMENT(S):

- *Ten years ago, the Santa Fe region had exceptionally clean air. Today, with the amount of prescribed burn smoke in the air, which has increased yearly, the public health is being substantially impacted according to local physicians. The most damaging aspects of breathing smoke is inhaling the tiny particulates known as "PM 2.5". These fine particulates affect lung function and can cause eye and nasal symptoms, adversely affecting our immune systems and increasing the risk of heart attack and cancer. (Doctors and Scientists Against Wood Smoke Pollution)*

Theme 2-2: Forest Natural Range of Variability

Four comments (contained in letter numbers 8, 60, 72, and 111) expressed an interest in further analysis of the effects of prescribed fire and vegetation thinning on forest structure and natural regeneration. Comments expressed concerns that the treatments would result in a departure from the natural range of ecosystem variability typically found in unmanaged, natural forests.

REPRESENTATIVE COMMENT(S):

- *Another justification for this Project is eradicating the so-called "over-abundance" of trees and vegetation. However, by removing the vast majority of trees and understory and by repeated burning, you ensure that understory will never return to support a natural and healthy forest. Furthermore, our local watersheds have been severely damaged due to draught caused by climate change, and this Project will cause further damage to these vulnerable areas.*

Theme 2-3: Wildfire Effects

Thirty-six comments (contained in letter numbers 6, 7, 10, 12, 15, 16, 18, 26, 35, 37, 49, 54, 61, 62, 73, 74, 76, 77, 79, 81, 84, 87, 89, 93, 107, 110, 114, 115, 117, 118, 120, 122, 124, 129, 130, and 131) requested further analysis regarding the efficiency of prescribed burns at reducing the likelihood of catastrophic wildfires and expressed concern over prescribed burning intervals outlined in the EA.

REPRESENTATIVE COMMENT(S):

- *The FS uses outmoded research justifying prescribed burns and thinning every 5-15 years, whereas more recent research argues that treatment should be applied only every 55 years. (Baker 2017) Intentionally burning forests this frequently creates dry, barren and sterile forests lacking ecological integrity and diversity. Trees help cool the forest floor and retain moisture for a healthy forest ecosystem.*

Theme 2-4: Wildland/Urban Interface

Five comments (contained in letter numbers 6, 18, 96, 102, and 130) questioned whether alternative measures such as enforcing strict building codes or thinning around structures could be used to prevent catastrophic wildfires without having to use prescribed burns and vegetation thinning as planned in the Proposed Action.

REPRESENTATIVE COMMENT(S):

- *If the purpose is to protect houses built into the surrounding forest it should be addressed by enforcing strict codes to fireproof those buildings with 100 foot or more mediation of their surroundings, and fire-resistant construction. Looking at Paradise California and seeing building built too close together burning down and yet the trees next to them surviving in some cases indicates the problem was not the fire but the lack of fire preparation in that community. [...]*
- *One of the major reasons for this Project is to prevent wildfires from burning our homes. However, it has been proven that active thinning around structures renders them safer than cutting down the forest. In 2016 a study revealed that such treatments are useless for decreasing the amount and intensity of fires in Western forests, and may even increase fire impact. Also, the open land resulting from the removal of the majority of trees increases wind speeds and enhances destructive fire behavior. In fact, thinned and open forests are drier and more flammable. Debris left from logging and thinning causes wildfires of greater intensity. Simple observation of "treated" areas demonstrates that forest ecology has been greatly harmed.*

RESPONSE:

In 2009, the USDA Forest Service established policy direction for climate change considerations in project-level National Environmental Policy Act analysis (U.S. Forest Service 2009). The policy calls for

addressing climate change through two types of climate change effects analysis in National Environmental Policy Act documentation when appropriate.

The effect of a proposed project on climate change (greenhouse gas emissions and carbon cycling). Examples include short-term greenhouse gas emissions and alteration to the carbon cycle caused by hazardous fuels reduction projects and avoiding large greenhouse gas emissions pulses and effects to the carbon cycle by thinning overstocked stands to increase forest resilience and decrease the potential for large scale wildfire.

The effect of climate change on a proposed project. Example: effects of expected shifts in rainfall and temperature patterns on the seed stock selection for reforestation after timber harvest and effects of decreased snow fall and increasing earlier snow run-off."

Concerning Number 1. The information provided in the EA Section 3.8, Air Quality and Climate, and in the Fuels and Wildfire Behavior – Air Quality – Climate Change and Carbon Sequestration specialist report discloses the potential impacts from the No Action Alternative and Proposed Action resulting from smoke and compares the estimated impacts to national and state criteria air pollutants. The EA and specialist report also analyze greenhouse emissions by showing several possible current condition and future wildfire and prescribed burning scenarios. Using this information, the public can compare and evaluate potential emissions among the alternatives. The SFMLRP EA and specialist report disclose the potential changes to stored carbon and how the implementation of the Proposed Action would move to stabilize carbon storage over time, compared to no action (see EA Sections 3.8.1 and 3.8.2).

Concerning Number 2. Due to approximately 100 years of fire suppression and past management practices, the ecosystems in the proposed project area are now far outside the natural range of variability for these forest ecosystems (see EA Section 1.4, Existing and Desired Conditions). Global warming or climate change effects are increasing the risk of severe drought and damaging wildfires. The information provided in the SFMLRP EA and in the specialist report addresses the effects of climate change to the proposed project area and how the implementation of the Proposed Action would move the area towards meeting the Santa Fe National Forest Land and Resource Management Plan's goals, objectives, and desired conditions. Moving towards or meeting desired conditions would increase ecosystem resilience and resistance to unnaturally intense, damaging wildfires and increase public safety in the wildland/urban interface (WUI).

Effects of Smoke. The SFMLRP EA and specialist report address the Clean Air Act regulatory framework and how human health would be protected during implementation of the project as required by law. EA Section 3.8.2, under Air Quality and Climate, and the specialist report also show how the adverse health effects of wildfire fire would be reduced by implementation of Proposed Action prescribed burning. The U.S. Forest Service would take measures to manage smoke impacts resulting from prescribed fire following design features Air-1 through Air-6 (see EA Appendix C). Prior to implementing a prescribed fire, a prescribed fire plan would be written to follow the New Mexico Smoke Management Program. Prescribed fires would be carefully evaluated to consider smoke dispersal into nearby communities surrounding the Santa Fe Mountains. As a result, the effects on air quality from prescribed fire would be short term and localized near the prescribed fire area.

Forest Natural Range of Variability. Due to approximately 100 years of fire suppression and past forest management practices, the proposed project area's ecosystems are now far outside the natural range of variability (or variation). In addition to unnaturally dense forest stands and heavy fuel load accumulation, global warming or climate change effects are increasing the risk of severe drought and damaging wildfires. The information provided in the EA and in the Fuels and Wildfire Behavior – Air Quality – Climate Change and Carbon Sequestration report addresses the effects of forest thinning and prescribed burning and how implementation of the Proposed Action would move the area towards meeting the Santa

Fe National Forest Land and Resource Management Plan's goals, objectives, and desired conditions. Implementation of the project and continued future frequent prescribed burning and naturally ignited wildfires would move the area towards meeting desired conditions.

Wildfire Effects. The EA and specialist report show that currently, most of the proposed project area is at high risk of large, high-intensity wildfires that would significantly damage forest ecosystems, wildlife, homes, and other structures in the WUI, and adversely affect watersheds and water quality. Because most of the proposed project area currently is far outside the natural range of variability, wildfires would burn at unnaturally high intensity and crown fire over broad areas would kill thousands of acres of trees. The EA and specialist report show that implementation of the proposed project would move the area towards meeting forest ecosystem and fuels desired conditions and support the frequent use of fire at intervals and intensity that would approximate the natural range of fire intervals.

Wildland/Urban Interface. The USDA Forest Service is not the agency having jurisdiction over building codes and fire codes affecting private property or other non-National Forest System lands. However, Forest Service policy calls for the agency to take actions that would increase the protection of private property, such as homes and other structures, in areas where wildfires have the potential to damage or destroy buildings adjacent to agency lands. The EA and specialist report disclose how implementation of the proposed project would decrease wildfire intensity near structures.

Topic 3: Vegetation Communities

Theme 3-1: Carbon Sequestration

Three comments (contained in letter numbers 3, 102, and 111) requested further analysis regarding the impacts of the Proposed Action on carbon release and storage as a result of the vegetation thinning and prescribed fire treatments.

REPRESENTATIVE COMMENT(S):

- *The EA does not adequately address the issue of carbon release and storage. An analysis must include the total carbon release, including the fossil fuels needed to carry out the treatments, the effect of soil compaction, the loss of sequestration potential by reducing the number of trees, the carbon released by slash burning, and the regrowth rates, among other effects.*

Theme 3-2: Forest Ecology

Twenty-three comments (contained in letter numbers 3, 13, 18, 69, 85, 96, 106, 114, 115, 122, 124, 129, and 133) expressed concerns about the vegetation treatments outlined in the Proposed Action, including the use of herbicides to eliminate invasive plant species. Another comment expressed concern over the proposed tree thinning plan and questioned whether the diameter at breast height selected for thinning should be reduced.

REPRESENTATIVE COMMENT(S):

- *While plants may survive the impacts of a broadcast burn, they are less likely to survive a pile burn, or being buried under wood chips, or an incidental herbicide application. Known occurrence of state listed endangered plants include wood lily (*Lilium philadelphicum* var. *andinum*) and yellow lady's slipper (*Cypripedium parviflorum* var. *pubescens*). In addition, the treatment areas are mapped within 5 miles of known populations of the federally listed Holy Ghost Ipomopsis (*Ipomopsis sancti-spiritus*).*

Although the species is currently only known to occur along the Holy Ghost Canyon Road, it may occur elsewhere on the Santa Fe National Forest, in the appropriate habitat. Was potential habitat analyzed for Holy Ghost Ipomopsis in the project area? Surveys for state and federally listed plants are essential prior to any treatment in the habitat of these sensitive resources, so they can be avoided if found.

- *Among my concerns is the plan to do so much drastic thinning which seems to be geared to lumber production in that it initially wanted to take trees with a 24-inch diameter. Reducing that to 16 inches still takes older more fire-resistant trees and would leave the smaller diameter and less valuable trees. The amount of thinning would leave the ground open to far too much drying conditions which with our present global warming projections would be far worse for the forest making the remaining trees more susceptible to damage from wind, drought, and disease.*

RESPONSE:

The Proposed Action has been revised to no longer include herbicide application. However, as provided in design feature Plant-7, if deemed necessary for successful riparian restoration, herbicides would be applied to non-native species within riparian areas in a manner that is consistent with the SFNF Invasive Plant Control Project ROD (U.S. Forest Service 2018b).

Carbon Sequestration. See the Santa Fe Mountains Landscape Resiliency Project: Fuels and Wildlife Behavior – Air Quality – Climate Change and Carbon Sequestration specialist report in project record. EA Table 2.9 provides comparison of the No Action and Proposed Action and addresses carbon sequestration as related to air quality and climate. EA Section 3.8.2 explains the Proposed Action would increase ecosystem resistance and resilience that could result in carbon sequestration beyond the 10- to 15-year project duration. Even though practices such as thinning and prescribed fire may release carbon in the short term, they focus growth and sequestration for the future on trees that are at lower risk and/or are more resilient to disturbance. Previous research in southwestern ponderosa pine forest has demonstrated that a restored condition that is maintained by regular surface fire can store more carbon than a fire-suppressed condition when the effects of unplanned wildfire are incorporated (Hurteau 2017). More information on carbon sequestration can be found in EA Section 3.8.1.

Forest Ecology. The analysis related to vegetation communities (EA Section 3.2) addresses the impacts of the Proposed Action as related to forest and woodland structural distribution and species composition, anticipated impacts related to common insects and disease agents, preservation and promotion of southwestern white pine, and the preservation and promotion of old growth, as well as the site-specific Forest Plan amendments. The impact analysis focuses on issues listed at the beginning of EA Section 3.2, Vegetation Communities, which include silvicultural concerns, forest health, upland vegetation, old growth, and MSO and northern goshawk habitats.

A brief description of common insects and disease agents found within the project area is provided on EA Section 3.2.1, and the anticipated effects, related to forest health as well as insects and disease, under the Proposed Action are presented in EA Section 3.2.2. The decrease in stocking resulting from thinning treatments and use of prescribed fire is anticipated to reduce resource (water, nutrients, and light) competition among trees, which would allow for improved resistance and resiliency from the impacts of agents such as bark beetles and defoliators (Kegley 2011; Livingston 2010; Pederson et al. 2011; Randall 2010a, 2010b, 2012). For example, healthier trees are more able to defend themselves from bark beetles, and more able to bounce back from defoliation events. See EA Section 3.2.2 for additional analysis on this topic.

The impacts from the No Action Alternative and the Proposed Action are presented in the draft EA under “Treatment Effects” in Section 3.2.2 as well as within the Vegetation Effects Analysis specialist report (see project record). The Vegetation Effects Analysis goes into greater detail on both alternatives, including relevant scientific literature and vegetation growth and yield modeling of a sampling of local vegetation within the project area.

Lumber production. The vegetation treatments that constitute the Proposed Action of the draft EA are described in Section 2.1.2. These treatments are vegetation thinning (within and outside of Mexican spotted owl [MSO] protected activity centers), prescribed fire treatments (within and outside of MSO protected activity centers), as well as riparian restoration treatments. The proposed thinning treatments may be conducted by hand (chainsaws) and with machinery (masticators), while excavators and other specialized equipment may also be used to move and treat fuels. The draft EA also states that "Forest products would not be generated as a part of this project with the exception of fuelwood where conditions allow and do not conflict with resource objectives." In other words, apart from fuelwood, no other product would be offered or sold. This includes sawtimber, lumber, posts, poles, chips, biomass, and so on. Additionally, no new roads are proposed as part of this proposed project. In fact, the draft EA details that roughly 1.5 miles of Forest Road 79W would be gated and closed (EA Section 2.1.2).

Southwestern White Pine. The Vegetation Effects Analysis specialist report (see project record) addresses the anticipated effect upon southwestern white pine. Within this report the silvicultural approach to southwestern white pine management is described (i.e., retain as much as possible or feasible), and the outlook for southwestern white pine is described, explicitly, for the No Action Alternative, and generally for the Proposed Action as a shade-intolerant and fire-tolerant tree species.

Diameter Caps. Section 2.1.2 of the draft EA details the thinning diameter limits of the Proposed Action. Specifically, the limits are 16 inches dbh, 12 inches diameter at root collar (drc) for junipers and twoneedle pinyon pine, and 9 inches dbh within MSO protected activity centers. These diameter caps are all tiered to the U.S. Forest Service recovery plan for the Mexican spotted owl. These diameter limits are maximum upper limits and site-specific diameter limits would be determined by the conditions-based approach described in EA Section 2.1.1. In other words, no tree larger than 16 inches dbh (9 inches dbh within a protected activity center) or 12 inches drc would be removed as part of thinning operations, and depending upon existing conditions, smaller unit-specific diameter limits would likely be employed.

Please see the draft EA for discussion regarding many topics including habitats and species/habitat design features (Appendix C). The project is anticipated to have potential beneficial and negative short-term impacts and long-term beneficial impacts including habitat resiliency. The project is conditions-based and includes design features that allow for the site-specific management of multiple species habitats if they are present in each treatment unit. As such, this allows for managers to determine the actions needed prior to and during implementation in order to protect and improve the site-specific habitats, including but not limited to occupancy, seasonal timing restrictions, flag and avoid, etc. A discussion of potential impacts to the Holy Ghost ipomopsis (HGI) has been added to EA Section 3.4, Threatened and Endangered Species. The naturally occurring population of HGI is located more than 5 miles from proposed treatments, and introduced HGI are located more than 4 miles from proposed treatments. Potential impacts to HGI would be included in the project biological assessment report. An analysis of HGI habitat requirements and potential impacts from the Proposed Action has been added to the EA (Section 3.4.1) to address public comments. Additionally, pre-implementation habitat assessment and HGI protection measures have been added to the design feature list in EA Appendix C.

Topic 4: Wildlife, Special-Status Species

Theme 4-1: Wildlife Habitat

Twenty-eight comments (contained in letter numbers 7, 20, 33, 45, 83, 86, 102, 108, 125, 130, and 131) questioned whether the draft EA adequately analyses the impacts of vegetation thinning and prescribed burning on wildlife habitat, including avian communities, beavers, bobcats, and bears.

REPRESENTATIVE COMMENT(S):

- Perhaps my biggest complaint with the Environmental Assessment is that it uses studies that support the Action alternative and ignores opposing studies. The "desired condition" is sparse trees, no canopy, and no understory. There is evidence that this is not the historical or natural state of a forest. Using fire scars to construct historical fire conditions has limitations that are not addressed. Intense fires do not leave burn scars; the trees are killed. The size and number of plot samples affect the conclusions; data must be interpreted with those parameters in mind. Studies (e.g. by Dr. Chad Hanson) show that Mexican spotted owls benefit from areas of intense fire and are harmed by thinning and prescribed fires. The EA defines high severity fires more broadly than is generally used, thus overstating its potential. Studies also show that thinned forests often burn more intensely and move more rapidly than unthinned ones. Fire models corroborate this finding.*
- We are writing to comment on the proposed Santa Fe Mountains Resiliency Project. A project of this magnitude demands, at a minimum, a full & rigorous Environmental Impact Study to determine its comprehensive effects on: 1) the health of the forest as a whole, including soil health and the critical mycorrhizal fungi network, which promote communication and nutrient sharing among trees. 2) ALL the wildlife in the forest (not just listed species!). Birds' nests occupied in the Spring by eggs and/or nestlings when many prescribed burns occur also count. 3) The health of the riparian corridors and the Santa Fe Watershed as a whole. 4) The health and quality of life of the human population in the area. 5) Regional Weather patterns and climate change.*

Theme 4-2: Special-Status Species

Five comments (contained in letter numbers 79, 106, 114, 124, and 130) questioned whether the draft EA adequately contemplates the impacts of vegetation thinning and prescribed burning on special-status species habitat, including Mexican spotted owl and Grace's warbler.

REPRESENTATIVE COMMENT(S):

- May significantly affect species listed or critical habitat designated under the Endangered Species Act, in particular Mexican spotted owl. The Forest Service states "According to the species sensitivities described in the 2012 MSO Recovery Plan (USFWS 2012), activities of the Proposed Action may affect MSO. Impact-causing elements of the Proposed Action include noise disturbance (e.g., operation of heavy machinery), removal of suitable nesting or perching trees or snags, and increased anthropogenic activity-related disturbance (e.g., increased vehicular traffic, human activity) (USFWS 2012). These disturbances have the potential to lead to change in MSO behavior or flush them from perches, daytime roosts, and nests. MSOs are known to have high site fidelity in established territories, and short-term impacts may disrupt normal behavioral patterns, such as breeding, foraging, etc., and may not be avoidable. If disturbances and associated*

changes in behavior occur, this could lead to increased vulnerability to heat-related stress and predation, or lead to nest abandonment and reduced reproductive success (U.S. Forest Service 2021c).

RESPONSE:

Please see the Draft EA Section 3.4, Threatened and Endangered Species, and Section 3.5, Flora and Fauna, for discussion of impacts from the proposed project on wildlife species and their habitats as well as special-status plants. EA Appendix C lists design features, best management practices, and mitigation measures intended to mitigate impacts to federally listed species, Forest Service management indicator species, and migratory birds. The project is anticipated to have potential beneficial and negative short-term impacts and long-term beneficial impacts including habitat resiliency. For impact on weeds please see the SFNF Invasive Plant Control Project ROD (U.S. Forest Service 2018b) for the Santa Fe National Forest for analysis and disclosure of potential impacts.

Habitat management does not focus on only one species. The treatments proposed in this project would maintain a diversity of habitats and improve habitats for the diverse range of species found in the project area, include those asked about (beavers, bobcats, bears), and many others, including Mexican spotted owl, migratory birds, plants, etc. See the draft EA for general wildlife habitat discussions. Beaver would benefit from treatments that improve riparian hardwood vegetation. Bobcats would benefit from improved prey availability following improved prey foraging because of thinning and burning increasing grass and forb availability and diversity. Bears are generalists and would benefit from improved foraging opportunities. Other indicator species such as pinyon jay will be considered when managing habitat under the conditions-based approach used in this EA. We understand that wildlife is important for helping to manage forest ecosystems.

Topic 5: Cultural Resources

Theme 5-1: Impacts to Cultural Resources

One comment (contained in letter number 96) questioned whether the draft EA adequately contemplates the potential for heavy equipment to adversely impact cultural resources.

REPRESENTATIVE COMMENT(S):

- *Masticators create erosion and roads other destructive means and are truly hideous. Indian and pioneer tracks started our road systems and I have seen evidence in Black Canyon of old homestead roads that current equipment has used.*

RESPONSE:

The Santa Fe National Forest recognizes the potential for heavy equipment to adversely impact cultural resources as discussed in EA Section 3.11, Heritage Resources. It is anticipated that there would be no adverse effects on archaeological resources as a result of implementing design features Heritage-13 through Heritage-16 (see EA Appendix C). Rather, these resources would benefit from vegetation treatments due to reduction of high-severity wildfire risk.

Cultural resource inventories of the project area have been and will continue to be completed by professional archaeologists as needed to properly identify cultural resources before project implementation. Additionally, an ethnographic study of the project area has been completed. The Forest Service has also conducted tribal consultation and collaborated with traditional rural communities to further understand, identify, and acknowledge traditional cultural uses within the project area. Standard

cultural resource protection measures will be implemented to protect Historic Properties (also referred to as archaeological sites, cultural sites, or cultural resources) and to ensure No Adverse Effect to Historic Properties.

Topic 6: Public Involvement

Theme 6-1: Request for Contact Information

Two comments (contained in letter numbers 14 and 24) asked to be kept informed of future developments related to this project and asked for agency contact information.

REPRESENTATIVE COMMENT(S):

- *I would like to be given the contact information to some of the people that will be running the projects on the ground. I would like to know which areas that are in the Los Alamitos Canyon general Area will happen and what will the scope be.*

Theme 6-2: Scoping, Stakeholder Input, and Comment Period

Twenty-three comments (contained in letter numbers 41, 45, 61, 75, 79, 84, 87, 95, 96, 98, 102, 106, 110, 113, 114, 124, 126, and 130) expressed concerns related to public input, including the scoping process and the draft EA comment period. Comments advocated for additional public outreach in the form of meetings held in the surrounding communities. Several comments stated that the initial 30-day comment period was too brief due to the size and complexity of the document. Other comments asked for additional opportunities for stakeholder input during the project scoping phase, prior to publishing the draft EA.

REPRESENTATIVE COMMENT(S):

- *The Forest Service has not really included the public in the analysis process. The Forest Service has not given sufficient notice of project comment periods. A number of commenters stated in their scoping comments that they did not know about the comment period in time to write thorough comments. The Forest Service only presented science at public meetings that was in accordance with its own perspective. The Forest Service did not allow the public to view any of the over 5,000 public scoping comments online or even in person at Santa Fe National Forest headquarters. Freedom of Information Act (FOIA) requests are often fulfilled by the Forest Service months or even years after the request is made and often past the time that the FOIA request will be useful to the requester.*
- *The public has been insufficiently included in the planning stages. I only found out about this large burn proposed just in the last week (10/1/2021). These are public lands that we as citizens are all a part of. Why aren't more people aware of this? [...]*

RESPONSE:

The Forest Service includes the public in the planning and refinement of a project. This was done with the scoping period in June and July 2019, and the draft EA comment period in September and October, 2021. The scoping and comment periods are 30 days as required by law to give ample time to read, digest, and formulate a response to the documentation issued by the Forest Service. Each of these periods came with two public meetings for the public to ask questions and as a tool to help with presenting the information in the draft environmental assessment. The comments received are used in developing and finalizing the environmental assessment. Scoping and comment period information was sent out via multiple outlets.

These included the Santa Fe National Forest website, official press releases, the local papers, and through social media.

Meeting presentations were provided by the Forest Service to local tribes and the Fireshed coalition. EA section 1.7 and chapter 4 describe public involvement and tribal consultation during the scoping, draft EA development and public comment periods. The SFNF will ensure ongoing consultation with Native American groups and other traditional communities during each implementation phase for the proposed treatment units.

Topic 7: NEPA Process

Theme 7-1: Scale of Analysis and Opposing Science

Four comments (contained in letter numbers 108, 113, and 114) expressed concern that the analysis lacked sufficient site- or project-specific detail. In addition, some comments expressed concern that opposing scientific views had not been adequately considered. Other comments suggested that the impacts of the proposed project be analyzed in an environmental impact statement.

REPRESENTATIVE COMMENT(S):

- *This lack of information is likely the best evidence available that this project needs to be analyzed via EIS rather than EA. See Southeast Alaska Conservation Council, et al. v. U.S. Forest Service, 443 F. Supp. 3d 995 (D. Alaska 2020) (rejecting an EIS for a project with a similar lack of information).*
- *Given the fallacies of using historic conditions as a reference for desired conditions and the uncertainty that treatments will maintain or restore ecological integrity in the context of climate change and likely forest conversion scenarios, the Forest Service must reevaluate its assumptions about its proposed vegetative treatments, especially in regards to restocking success and species composition. Significant controversy exists as to the need for such treatments given the improper use and reliance on historic conditions. In fact, there is a high likelihood based on the aforementioned studies that some areas will not regenerate and will instead result in conversion to different vegetative groups. The Forest Service should consider whether attrition due to climate change will reduce tree densities sufficiently so that thinning treatments are not needed to meet the SFMLR Project purpose. There appears to have been an increased amount of tree mortality in the SFNF in recent years. NEPA mandates that the agency address this controversy and science that contradicts agency assumptions in an EIS.*

Theme 7-2: Conditions-Based Approach

One comment (contained in letter number 114) questioned whether the use of the conditions-based approach was appropriate to address the environmental impacts of the Proposed Action and whether it adequately complies with NEPA requirements.

REPRESENTATIVE COMMENT(S):

- *The Forest Service reliance on Condition-Based Management violates NEPA. A. Background NEPA is "our basic national charter for protection of the environment." Center for Biological Diversity v. United States Forest Serv., 349 F.3d 1157, 1166 (9th Cir. 2003) (quoting 40 C.F.R. § 1500.1 (2019)). In enacting NEPA, Congress recognized the "profound impact" of human activities, including "resource exploitation," on the environment and declared a national policy "to create*

*and maintain conditions under which man and nature can exist in productive harmony." 42
U.S.C. § 4331(a). [...]*

RESPONSE:

Analysis was done using the best available science to the Forest Service. We do not have complete information on every acre of the landscape. However, we do have enough information to make very informed and guided decisions about the landscape. The conditions-based approach allows flexibility and lets us take into consideration and account for variances in information and adapt to the environmental conditions that are existing on each specific site. Prior to any implementation, the Forest Service would identify and determine site-specific treatment units and prescriptions based on site-specific conditions. As landscape and on-the-ground conditions vary, the appropriate tools and information is applied to reach the desired results. The process used is described in more detail in the EA Section 2.1.2. Furthermore, EA Appendix C provides a comprehensive list of design features, best management practices, and mitigation measures that would be reviewed and applied, as resource conditions warrant, as part of the implementation process.

Topic 8: Climate Change

Theme 8-1: Greenhouse Gases Emissions and Carbon Storage

Six comments (contained in letter numbers 79, 114, 125, 127, 129, and 130) expressed concern that the proposed project would contribute to increasing the release of greenhouse gases to the atmosphere and reduce forest carbon sequestration due to removal and burning of trees.

REPRESENTATIVE COMMENT(S):

- *The area's forests are likely currently acting as carbon sinks, meaning they are storing more carbon than they are emitting. Science makes clear that the proposed action will likely worsen climate emissions by removing trees that are currently fixing carbon, turning them into wood products (which results in a significant loss of that carbon fixed in wood), and leaving a landscape with fewer or no trees and (eventually) seedlings that fix far less carbon than mature forests for decades if not centuries. It is crucial not only to protect old and mature forests, but to ensure early and mid-seral stands can grow into new those conditions, especially since the Forest Service has admitted, regarding mature forests in Alaska, such forests "likely store considerably more carbon compared to younger forests in this area (within the individual trees themselves as well as within the organic soil layer found in mature forests)." (U.S. Forest Service 2016, 3-14).*
- *While uncertainty remains around climate change mitigation strategies, it is well-known that carbon sequestration by trees and forests have the potential to positively impact climate change. Unfortunately, the SFMLRP does the opposite by cutting and burning our forests, causing carbon to be released into the atmosphere. While I applaud the Santa Fe National Forest for reducing the size of the trees cut from diameters of 24" to 16", a sixteen-inch diameter Ponderosa is over 150 years old. It will continue to contribute to carbon sequestration for hundreds of years. If cut and burned it may not be replaced due to climate change. A young tree will not store carbon for close to one hundred years. Thus, when we "thin" our forests of mature trees we are killing all life on our planet. The Forest Service must place a priority on land management which promotes forest Carbon storage.*

RESPONSE:

In 2009, the USDA Forest Service established policy direction for climate change considerations in project-level National Environmental Policy Act analysis (U.S. Forest Service 2009). The policy calls for addressing climate change through two types of climate change effects analysis in NEPA documentation when appropriate.

"1. The effect of a proposed project on climate change (greenhouse gas emissions and carbon cycling). Examples include short-term greenhouse gas emissions and alteration to the carbon cycle caused by hazardous fuels reduction projects and avoiding large greenhouse gas emissions pulses and effects to the carbon cycle by thinning overstocked stands to increase forest resilience and decrease the potential for large scale wildfire.

2. The effect of climate change on a proposed project. Example: effects of expected shifts in rainfall and temperature patterns on the seed stock selection for reforestation after timber harvest and effects of decreased snow fall and increasing earlier snow run-off."

Concerning Number 1. The information provided in the EA Section 3.3, Fire and Fuels and Section 3.8, Air Quality and Climate, as well as in the Fuels and Wildfire Behavior - Air Quality - Climate Change and Carbon Sequestration specialist report discloses the potential impacts from the no action alternative and Proposed Action resulting from smoke and compares the estimated impacts to national and state criteria air pollutants. The EA and specialist report also analyzes greenhouse emissions by showing several possible current condition and future wildfire and prescribed burning scenarios. Using this information, the public can compare and evaluate potential emissions among the alternatives. The SFMLRP EA and specialist report disclose the potential changes to stored carbon and how the implementation of the Proposed Action would move to stabilize carbon storage over time compared to no action (see EA Section 3.8.1 and 3.8.2).

Concerning Number 2. Due to approximately 100 years of fire suppression and past management practices, the proposed project area's ecosystems are now far outside the natural range of variability (or variation). Global warming or climate change effects are increasing the risk of severe drought and damaging wildfires. The information provided in the EA Section 3.8, Air Quality and Climate, and in the Fuels and Wildfire Behavior – Air Quality – Climate Change and Carbon Sequestration specialist report addresses the effects of climate change on the proposed project area and how the implementation of the Proposed Action would move the area towards meeting Santa Fe National Forest Land and Resource Management Plan's goals, objectives, and desired conditions. Moving towards or meeting desired conditions would increase ecosystem resilience and resistance to unnaturally intense, damaging wildfires and increase public safety in the WUI areas.

The EA addresses the effects of the proposed project on climate change under Section 3.8.2 (Air Quality and Climate). A response to comments regarding the effects of smoke is presented in Topic 2 (Air Quality, Wildfire, Wildland/Urban Interface), Theme 1 (Effects of Smoke) of this appendix.

Topic 9: Grazing

Theme 9-1: Grazing

Four comments (contained in letter numbers 79, 94, and 127) questioned whether the draft EA accurately and appropriately analyzes the impacts of the Proposed Action on livestock grazing and expressed concerns over the mitigation measures proposed to limit grazing impacts to soil and riparian areas. One comment suggested changing the language regarding fencing as a mitigation measure to reflect riparian restoration priorities and objectives outlined in the environmental assessment.

REPRESENTATIVE COMMENT(S):

- *The third paragraph on p. 38 reads: Fencing may be installed if needed to protect restored areas if it is determined that riparian vegetation regeneration is being hampered by browsing and grazing. If it is "needed to protect restored areas" and "it is determined that riparian vegetation regeneration is being hampered by browsing and grazing", then there is, by the wording of this very sentence, a "need". This should therefore be changed to: "Fencing will be installed if needed to protect restored areas if it is determined that riparian vegetation regeneration is being hampered by browsing and grazing." This wording also needs correction on p. 45: "For proposed riparian restoration activities within Tesuque Creek and Arroyo Hondo, fencing may be installed, if needed to protect restored areas if it is deemed that riparian vegetation regeneration is being hampered by browsing and grazing." For the same reason, this sentence should be changed to: "For proposed riparian restoration activities within Tesuque Creek and Arroyo Hondo, fencing will be installed, if needed to protect restored areas if it is deemed that riparian vegetation regeneration is being hampered by browsing and grazing."*

RESPONSE:

Through livestock management techniques of herding, season of use, and water and fencing infrastructure outside and along riparian areas, livestock can be limited to using riparian areas to meet desired conditions of riparian areas in accordance with the Santa Fe National Forest Plan. The project area is within an active grazing allotment that permits livestock grazing through various laws and regulations.

Fencing may not actually be a need. Fencing is a tool that can be used to manage browsing and grazing by animals but can also impede access to water for wildlife and livestock. Livestock can be managed by other management tools to promote riparian vegetation regeneration, such as duration of grazing in the area, timing, intensity or deferment of grazing from the area.

Topic 10: Inventoried Roadless Area*Theme 10-1: Inventoried Roadless Area*

Sixteen comments (contained in letter numbers 24, 79, 84, 102, 113, 114, 123, 124, 125, 126, 127, and 130) expressed concerns about the need for treatment in the inventoried roadless areas (IRAs), prevention of overland travel from becoming new roads in the IRAs, keeping illegal vehicles out of IRAs, protecting the wilderness properties of IRAs, and decommissioning roads. One comment questioned whether the Thompson Peak area should be treated as planned in the Proposed Action because the proposed treatment may affect the integrity of the wilderness.

REPRESENTATIVE COMMENT(S):

- *The proposed action of the Santa Fe National Forest Land Management Plan FEIS, designates Thompson Peak as a recommended wilderness area. It is contained within the Thompson Peak IRA, an area that is proposed to receive fuel treatments in the SFMLRP. It has high level natural quality except for invasive weeds in some disturbed areas. Only a few closed roads are visible off of the eastern edge. There are three reaches with pure cutthroat trout (Regional Forester's sensitive species) present. (U.S. Forest Service 2018a, Vol. 3 at 162). This area must be maintained as free of disturbances as possible in order to maintain its wilderness quality.*

RESPONSE:

No new roads would be constructed in any of the IRAs. The SFMLRP area includes eight IRAs governed by the 2001 Roadless Conservation Rule. These IRAs comprise approximately 24,613 acres of the 49,786-acre SFMLRP area (EA Table 3.49), which is almost half of the entire project area. Excluding IRAs from the project area would defeat the purpose of the project. There are a total of 8.23 miles of existing classified roads within the IRAs found in the project area as discussed in EA Section 3.14, Inventoried Roadless Areas.

The Proposed Action described in EA Section 2.1.2 states that prescribed fire, riparian restoration, and manual and mechanical thinning treatments would occur within all eight of the IRAs within the project area. The restoration methods applied within the IRAs would use equipment and vehicles that do not require the use of new access roads (e.g., either vehicles would use existing roads within the IRA or vehicles capable of overland travel would be used). The project proposes up to 18,000 acres of mechanical or hand-thinning treatments, up to 38,000 acres of prescribed burning, up to approximately 672 acres of riparian restoration, and 1.5 miles of road closure. The road closure is to protect archaeological resources. Mechanical treatment would only occur on slopes with gradients less than 40 percent; manual treatments could occur on all slopes. Approximately 11,732 acres of the IRAs is on gradients less than 40 percent.

No permanent or temporary roads would be constructed, but existing roads, trails, and routes may be used for access. Where this occurs, the design features would require reclamation of these routes to pretreatment standards. See EA Appendix C for Rec-2 through Rec-5, which are mitigation measures intended to minimize impacts to recreation users. Overland travel by vehicles that do not require roads to be constructed (e.g., masticators, utility terrain vehicles) may occur.

Rec-2. If equipment must cross trails and roads, crossing would be minimal, perpendicular to the trail, and rehabilitated after treatment of the area.

Rec-3. Use of trails as access routes for heavy equipment should be considered carefully and other routes evaluated to best protect all resources, including recreation.

Rec-4. If trails must be used as access routes, they need to be fully reclaimed with sustainable trail practices implemented such as proper cut slope, width for managed use, and drainage features including rolling grade dips, water turnouts, armoring above and below the trail at drainage crossings, water bars, and check darns. Trail reconstruction will be coordinated with the U.S. Forest Service recreation team.

Rec-5. Avoid crossing or using motorized and nonmotorized system trails where feasible. If a trail or section of trail is affected, the trail shall be restored to the original condition. All treatment slash and debris would be removed from trails. It is acceptable to make perpendicular trail crossings. Trail crossing locations would be designated and flagged with input from a qualified U.S. Forest Service recreation staff or designated representative. Crossings of existing forest system trails would be restored to pre-project condition after use.

Rec-12. Disguise route entrances to firelines with rocks, boulders, downed trees, and forest litter to prevent them from being seen, easily accessed and becoming user trails. It should be difficult to access these areas for recreational use.

The Santa Fe National Forest Travel Management Plan signed in 2013 (U.S. Forest Service 2013) prohibits motor vehicles to drive outside of designated roads and trails that are open to the particular class of motorized vehicles specified. As stated above, there are only 8.5 miles of existing motorized roads within the IRAs in the project area. Even so, unauthorized and illegal driving of motorized vehicles occurs throughout the forest. The concern that this will continue or get worse with the Proposed Action is

valid. The Proposed Action will not prevent this trespass from continuing, although during implementation the increased presence of Forest Service personnel may help discourage unauthorized motor vehicle travel. Decommissioning of closed roads, along with plans and efforts to better enforce travel management, is beyond the scope of this EA. However, design features like Rec-12 (see EA Appendix C) would lessen the possibility that overland travel routes would continue to be used as a new road within an IRA. The purpose of the Proposed Action is to lessen the chance of catastrophic fire which is the greatest threat to the landscape.

Efforts would be in place throughout implementation to protect the IRAs from new use of motorized vehicles as a result of the Proposed Action. Continued monitoring and enforcement of overland routes to prevent them from becoming new motorized roads will be in progress throughout implementation and beyond as part of the normal travel management implementation for the Santa Fe National Forest.

It is recognized that all of the IRAs, including Thompson Peak, are special areas to be protected for future generations, if not recommended wilderness areas in the future. Treatments where the proposed project and recommended wilderness overlap would need to comply with plan components for recommended wilderness areas. If this area were to become a wilderness area or the forest plan were to be amended, the conditions-based approach would allow flexibility to conform to the forest plan.

The Proposed Action will not preclude future decisions as described in the EA Section 3.14.2, under the Inventoried Roadless Area discussion. Impacts to the nine characteristics of IRAs, as described in detail in the EA, vary depending upon the affected resource. While some short-term adverse impacts may occur, they are generally outweighed by the long-term benefits of the Proposed Action, including the reduced risk for high-severity wildfire. The adverse impacts would occur on less than 16% of the total IRA acreage within the project area and would generally be mitigated by the design features developed for the project. This project is also expected to reduce risks of high-severity, stand-replacing wildfires; thereby resulting in long-term beneficial impacts across all 24,613 acres of IRA within the SFMLRP area (U.S. Forest Service 2021a).

There would be moderate, temporary traffic on County Road B52 to access Forest Road 50A where there are some small units identified for possible treatment. Crews would be transported primarily with pickup trucks and will stay on the public right-of-way roads only. There is no work proposed in Pecos Canyon, so there would be no vehicle traffic in this area from the proposed project. The La Cueva Road is generally the southeastern/eastern boundary of the project. More thinning would take place primarily along the road north of the recent treated areas (farther from the village of La Cueva); vehicle travel to conduct those treatments would involve primarily pickup truck traffic and the amount would vary according to the amount of work that may be needed.

Topic 11: Visual Resources

Theme 11-1: Visual Resources

Four comments (contained in letter numbers 98, 114, 119, and 130) questioned the assumptions outlined in the EA regarding the long-term positive effects of the proposed project on the scenic character of the project area and of the public perception of these changes. One comment expressed concerns about the impacts of the Proposed Action on Santa Fe-area residents.

REPRESENTATIVE COMMENT(S):

- *Many areas of the project area are easily accessible to the public for recreational uses. The Forest Service assumes that fuel treatments around recreation infrastructure would be seen by most people as a change that improves aesthetics: "Maintaining vegetation clearances or*

establishing new forest health practices around recreation infrastructure may result in changes to the recreation setting that people have grown accustomed to, but these changes would be intended to benefit the recreation setting in the long term. It would likely be perceived as an improved aesthetic change by most (U.S. Forest Service 2021b)." EA at 160. This is an unproven and unlikely assumption, and in fact many Santa Fe area residents express that they do not like the look of very open and dry forest, stumps and charred trees. [...]

RESPONSE:

The Proposed Action is expected to move the project area vegetation toward the desired scenic character. There will be short-term effects from project activities but in the long term, the effects are expected to make the vegetation conditions more heterogenous and resilient to uncharacteristic disturbances (see EA Section 3.10, Scenery). Design Features Rec-1, Rec-9 through Rec-13, and Scen-1 through Scen-10 will help reduce contrasts that detract from the natural appearance of the project area scenery (see Appendix C of the EA).

Visual preferences for forest settings vary widely with the general public. See EA Section 3.10.2, under Scenery, for generalizations that were noted for public preferences. It was noted in a 2008 study by Hill and Daniel that the public often judges the ecological health of a forest by appearance. Preferences for landscapes with large trees, openings, and varied spatial distribution for vegetation that provides views through the site and into the landscape were noted (Brown and Daniel 1984, 1986, 1987; Ryan 2005).

It is recognized that beyond these generalizations, individual preference varies widely and not everyone would see the restoration activities as a positive change long term. However, the risk of catastrophic fire with the No Action Alternative may mitigate some of the concerns over the potential alterations of forest aesthetics. Most would agree that the radical change in a stand-replacing fire would not be a desirable change.

To protect archaeological resources, a 1.5-mile road segment would be permanently closed. This short section of rough road does not add to the quality of the recreation experience for most. There are numerous alternatives for those who are looking for recreational driving experiences. There is a visual buffer around campgrounds where there is no treatment. See Design Feature Rec-1 in EA Appendix C.

Rec-1. Create a 150-foot visual buffer around campgrounds and picnic areas where no thinning or piling would occur. Prescribed fire would be allowed to back into these areas. Also see Design Features Rec-9 through Rec-13 that further protect the visual quality of recreation areas and trails.

Rec-9. Stumps will be cut to a maximum of 8 inches within 50 feet of National Forest System trails, and as low as possible in all other distances zones.

Rec-10. Paint and markings, such as butt marks, leave-tree, and boundary markings within 150 feet of National Forest System trails, roads, and campgrounds would be applied facing away from these areas to reduce visibility. Flagging would be used in these areas, where practical, to mark unit boundaries and should be removed upon project completion.

Rec-11. Cut trees flush with trail when they need to be cut on the edge of the trail and road.

Rec-12. Disguise route entrances to firelines with rocks, boulders, downed trees, and forest litter to prevent them from being seen, easily accessed, and becoming user trails. It should be difficult to access these areas for recreational use.

Rec-13. Activity-generated fuels created within 150 feet of National Forest System trails and roads would be piled and burned or removed within 2 years of operations and within 1 year for areas managed for a

Visual Quality Objective of Retention. Where possible, leave a vegetative buffer of at least 33 feet alongside the trail.

None of the Proposed Action activities would occur in this buffer. Routine maintenance will occur such as maintaining clearance around recreation infrastructure and mitigating hazard trees.


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- . 2021c. *Biological Assessment for the Santa Fe Mountains Landscape Resiliency Project*. Prepared for U.S. Department of Agriculture, Forest Service, Española and Pecos-Las Vegas Ranger Districts, Santa Fe National Forest. July 14.

Appendix A

Table A-1. Comment Coding Structure

 Ecosystem Management Coordination CARA Comment Analysis and Response Application		
Coding Structure Report		
Project:	Santa Fe Mountains Landscape Resiliency Project (55088)	
Comment Period:	Notice of Availability -	
Period Dates:	9/29/2021 - 10/29/2021	Generated: 1/28/2022 3:32 PM
Code #	Code Name	Comment Count
Total Comments		777
Issue/Action		
101	Code TBD/Pending	0
102	No Further Response Required	248
102.01	Beyond Scope	13
102.02	Position, No Rationale	227
102.03	Already Addressed	5
110	Decision Process	1
110.02	Coordination, Consultation	0
110.04	Laws, Policies	0
110.05	General Use of Science	11
110.06	Land Mgmt Emphasis	0
111	Public Involvement	23
111.01	Outreach/Education	1
111.02	Collaboration, Meetings	0
111.03	Comment Period	0
112	Agency Organization	0
112.01	Funding, General	0
112.02	Staffing	0
112.03	Outsourcing, Contracting	0
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Coding Structure Report

Code #	Code Name	Comment Count
Issue/Action		
120	Proposed Action, Decision	3
120.01	Purpose and Need	0
120.02	Analysis type (CE, EA, EIS)	0
121	Issues, Alternatives	0
121.01	Alts. Not Analyzed In Detail	0
121.0201	Preferred Alternative	0
121.0202	No Action Alternative	0
122	Effects Analysis	1
122.01	Cumulative Effects Analysis	0
123	Technical, Editorial	0
130	Resource & Area Mgmt	0
130.01	Monitoring	0
130.02	Inventories, Mapping, GIS	0
132	Water, Watershed Mgmt	3
132.01	Riparian Area Mgmt	0
132.02	Water Infrastructure Mgmt	0
133	Air and Climate	9
133.01	Air Quality Mgmt	0
133.02	Climate Change	0
134	Soils Mgmt	0
134.01	Slope or Erosion Control	0
135	Minerals & Geology Mgmt	0
135.01	Minerals & Rock	0
135.02	Oil & Gas	0
135.03	Plan of Operation, Processes	0
135.04	Reclamation, Cleanup, Bonding	0
135.05	Mineral Uses, Alternatives	0

Coding Structure Report

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Coding Structure Report

Code #	Code Name	Comment Count
Issue/Action		
136	Fire and Fuels Mgmt	138
136.01	Suppression	0
136.02	Fuel Treatment, Reduction	10
136.03	Prescribed Burns	8
136.05	Safety, Risk Mgmt.	0
136.06	Wildland/Urban Interface	0
136.07	Smoke Mgmt	1
140	Biological Resources Mgmt	2
141	Vegetation Mgmt	11
141.01	Introduction, Planting, Seeding	0
141.02	Insects and Disease Treatment	0
141.03	Invasive Vegetation Treatment	0
142	Timber Mgmt	8
142.04	Harvest Methods	1
142.06	Allowable Sale Quantity (ASQ)	0
142.08	Other Uses	0
143	Wildlife/Animals Mgmt	26
144	Domestic Livestock, Grazing Mgmt	4
149	Other Activities Mgmt	0
149.01	Utility Corridors, Facilities	0
149.05	Permits (excl. rec. & grazing)	0
149.06	Valid Existing Rights	0
150	Trans. Sys. Mgmt (& non-rec. access)	0
150.02	Non-System, User-Created	0
150.03	Transportation Analysis	0
151	Roads Management	16
151.01	Road Construction, Maint.	0

Coding Structure Report

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Coding Structure Report

Code #	Code Name	Comment Count
Issue/Action		
152	Trails Management	1
160	Recreation Mgmt	3
162	Recreational Access	0
163	Developed Rec. and Facilities	0
164	Motorized Recreation Mgmt	0
164.0101	Full size vehicle use	0
164.0102	Single-track motorcycle use	0
164.0103	4- and 3-wheeler use	0
165	Dispersed Recreation Mgmt	0
165.03	Hunting, Shooting	0
165.04	Fishing	0
165.05	Equestrian/Pack Animals	0
165.06	Bicycling	0
170	Land Ownership, Uses	0
171	Land Designations/Mgmt	2
171.02	Designated Wilderness Areas	0
171.07	Wild and Scenic Rivers	0
180	Econ. & Soc. Actions, Analyses	0
182.01	Cultural, Hist., Anthro. Mgmt	1
Total Comments for Issue/Action		777
Resource/Rationale		
202	No Further Response Required	0
202.01	Beyond Scope	0
202.02	Position, No Rationale	0
202.03	Already Addressed	0
203	Multiple Resources/Reasons	0

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Coding Structure Report

Code #	Code Name	Comment Count
Resource/Rationale		
210	Persons, Groups	0
215	Forest Plan	0
220	Laws, Policies, Courts	0
220.0301	NEPA	0
220.0303	Endangered Species Act	0
230	Natural Environment	0
230.03	Forest Health	0
232	Water Resources	0
233	Air and Climate	0
233.01	Air Quality	0
233.02	Climate Change	0
234	Soils	0
235	Minerals & Geol. Resources	0
235.01	Minerals & Rock	0
235.02	Oil & Gas	0
236	Fire, Fire Risk	0
236.01	Wildland/Urban Interface Cond.	0
240.01	Ecosystem, Habitat Health	0
240.0101	Disturbance Regimes	0
240.02	Diversity, Extinctions	0
240.03	Species: TES, etc.	0
241	Vegetation	0
241.01	Plant Species: TES, etc.	0
241.02	Invasive, Noxious Plant Species	0
243	Wildlife/Animals	0
250	Transportation System	0
260	Recreation	0

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Coding Structure Report

Code #	Code Name	Comment Count
Resource/Rationale		
260.01	User Conflicts	0
270	Lands, Condition, Designation	0
270.01	Potential for Special Designation	0
270.02	Wilderness, Roadless Character	0
270.03	Adjacent Lands	0
280	Econ. & Social Conditions	0
282	Social Conditions and Values	0
282.01	Quality of Life	0
282.0103	Traditional Way of Life	0
282.0105	Scenery, Visual Resources	0
282.0106	Noise	0
282.02	Health, Safety	0
Total Comments for Resource/Rationale		0
Early Attention		
501	Threat of harm	0
502	Notice of appeal or litigation	0
503	Proposed new alternative	0
504	Requires detailed review	0
505	Government entities	0
506	Request public meeting, etc .	0
507	Requests for Information	0
507.01	FOIA	0
507.02	Request Documents or Info	0
508	Comment Period Extension	0
Total Comments for Early Attention		0

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Appendix B

Table B-1. Draft Environmental Assessment Comments Received

Name	Organization or Individual	Date Letter Was Submitted
Claire Frye	Individual	10/29/2021
Roger Frye	Individual	10/29/2021
Paula Seaton	Seaton Guardianship Service	10/29/2021
Ann McCampbell	Multiple Chemical Sensitivities Task Force of New Mexico	10/29/2021
Jan Boyer	OnceAForest.org	10/29/2021
Peggy McCarty	Individual	10/29/2021
Gary Sharlow	Individual	10/29/2021
Ann McCampbell	Multiple Chemical Sensitivities Task Force of New Mexico	10/29/2021
Emmy Koponen	Individual	10/29/2021
Lauren McGavran	Individual	10/29/2021
David Buettner	Individual	10/29/2021
Ann McCampbell	Multiple Chemical Sensitivities Task Force of New Mexico	10/29/2021
Jaime Lehner	Individual	10/29/2021
Juliana Sloane	Individual	10/29/2021
Ann Campbell	Multiple Chemical Sensitivities Task Force of New Mexico	10/29/2021
Sylvia Williamson	Individual	10/29/2021
Dyan Oldenburg	Individual	10/29/2021
Jon Asher	Individual	10/29/2021
Lillian Koponen	Individual	10/29/2021
Sarah Hyden	Individual	10/29/2021
Logan Glasenapp	Individual	10/29/2021
Simone Griffin	Individual	10/29/2021
Craig Jolly	Individual	10/28/2021
Mollie West	Individual	10/28/2021
Gregory Walke	Individual	10/28/2021
Grietje Laga	Individual	10/28/2021
Kenneth Klerlein	Individual	10/28/2021
David Birnbaum	Individual	10/28/2021
May Smith	Individual	10/28/2021
Daniela Roth	EMNRD – Forestry Division	10/28/2021
Nancy Windheart	Individual	10/27/2021
Marsha Emmerton	Individual	10/27/2021
Patricia Mann	Individual	10/27/2021
Evelyn Kunkel	Individual	10/27/2021
Don & Alberta Montgomery	Individual	10/27/2021

Name	Organization or Individual	Date Letter Was Submitted
Sunsan Abod	Individual	10/27/2021
Susan Schmall	Individual	10/27/2021
Carol Johnson	Individual	10/27/2021
Kurt Stritzl	Individual	10/26/2021
Adam Wasserman	Individual	10/26/2021
Sandy Zinn	Individual	10/26/2021
Melanie West	Individual	10/26/2021
Sophia Garrett	Individual	10/26/2021
Lucy Smith	Individual	10/26/2021
Bill Dam	Individual	10/26/2021
April Lowe	Individual	10/26/2021
Billie Bolton	Individual	10/26/2021
T. Tiegler	Individual	10/25/2021
Annon	Individual	10/25/2021
Garrick Beck	Individual	10/25/2021
Maria Spray	Individual	10/25/2021
Nina Simons	Individual	10/24/2021
Marta Ballen	Individual	10/24/2021
Makarand Karmarkar	Individual	10/24/2021
Kristen Speakman	Individual	10/24/2021
Gene Nathan	Individual	10/24/2021
Oksana Yufa	Individual	10/24/2021
Cathryn Schmidt	Individual	10/24/2021
Janet Tomski Anon	Individual	10/24/2021
Selah Kaiser	Individual	10/24/2021
Nancy Brannin	Individual	10/24/2021
Jane Lottimer	Individual	10/23/2021
Ann Harvey	Individual	10/23/2021
Gregg Manoff	Individual	10/23/2021
Dawn Ehrhard-Wingard	Individual	10/23/2021
Brenna James	Individual	10/23/2021
Tod Davis	Individual	10/23/2021
Cynthia Wilcox	Individual	10/23/2021
Patricia Walke	Individual	10/23/2021
Julie Rose	Individual	10/23/2021
Ann E Briggs	Individual	10/23/2021
Nomi Gallo	Individual	10/23/2021
Audrey Walker	Individual	10/23/2021
Jonathan Crews	Individual	10/23/2021

Name	Organization or Individual	Date Letter Was Submitted
Cinny Green	Individual	10/23/2021
Lois Purvis	Individual	10/22/2021
Monica Dick	Individual	10/22/2021
Sharon Smith	Individual	10/22/2021
James Smith	Individual	10/22/2021
John Ritter	Individual	10/21/2021
Robert Reilly	Individual	10/21/2021
Kathleen	Individual	10/21/2021
Barb Satink Wolfson	Individual	10/20/2021
Mark Wingard	Individual	10/19/2021
Kunkowski Bedajii	Individual	10/19/2021
Carla Newbre	Individual	10/19/2021
Susan Paquet	Individual	10/19/2021
Dorothy Roberts	Individual	10/19/2021
Michael Holland-Moritz	Individual	10/19/2021
Anon	Individual	10/19/2021
Seth Knight	Individual	10/19/2021
Maya Aubrey	Individual	10/18/2021
Carol Teutsch	Individual	10/18/2021
Michael Cherin	Individual	10/18/2021
Charlotte Levinson	Individual	10/18/2021
Janine Pearson	Individual	10/18/2021
Tim Blose	Individual	10/18/2021
Nancy Murphy	Individual	10/16/2021
Francois-Marie Patorni	Individual	10/15/2021
Willa Tanas	Individual	10/15/2021
Janet Duncan	Individual	10/14/2021
Gordon Smith	Individual	10/14/2021
Rachel Miller	Individual	10/14/2021
Stephen Schmidt	Individual	10/14/2021
Jon Klingel	Individual	10/14/2021
Kenneth Barnett	Individual	10/13/2021
Lucie Brennan	Individual	10/12/2021
Gary Magnus	Individual	10/12/2021
William Schneider	Individual	10/11/2021
Amy Maki	Individual	10/11/2021
Pete Meyers	Individual	10/11/2021
Rebecca Alvarez	Individual	10/10/2021
Harvey Wasserman	Individual	10/09/2021

Name	Organization or Individual	Date Letter Was Submitted
Ariëlle Verweij	Individual	10/09/2021
Anna Gieselman	Individual	10/07/2021
Alasdair Lindsay	Individual	10/06/2021
JC Corcoran	Individual	10/06/2021
Doug Booth	Individual	10/05/2021
Janet Harry	Individual	10/05/2021
Scott Ernst	Individual	10/01/2021
Esme Cadiente	Forest Stewards Guild	09/30/2021