

From: Hall, Joshua D -FS on behalf of FS-Northern NM Riparian and Aquatic Watershed Restoration
Sent: 7 Nov 2019 16:53:28 +0000
To: Meredith Zaccherio
Subject: FW: Northern New Mexico Riparian, Aquatic and Wetland Restoration Project
Attachments: Riparian Restoration CE letter - Defenders of Wildlife.pdf



Josh Hall
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Caring for the land and serving people

From: Michael Dax [mailto:MDAX@defenders.org]
Sent: Monday, November 4, 2019 9:55 AM
To: FS-Northern NM Riparian and Aquatic Watershed Restoration <SM.FS.NNMRAWR@usda.gov>
Cc: Bryan Bird <BBird@defenders.org>
Subject: Northern New Mexico Riparian, Aquatic and Wetland Restoration Project

Dear Mr. Hall,

On behalf of Defenders of Wildlife and our 1.8 million members, supporters, and online activists, please accept the following comments on the Northern New Mexico Riparian, Aquatic and Wetland Restoration Project for the Santa Fe, Carson and Cibola National Forests.

Thank you,

Michael Dax

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Southwest Program Office

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November 4, 2019

Northern New Mexico Riparian, Aquatic and Wetland Restoration Project
Santa Fe National Forest
11 Forest Lane
Santa Fe, NM 87508

RE: Northern New Mexico Riparian, Aquatic and Wetland Restoration Project

Dear Mr. Melonas, Mr. Duran, and Mr. Hattenbach,

Please accept the following comments on behalf of Defenders of Wildlife regarding the northern New Mexico riparian, aquatic and wetland restoration project. Defenders is a non-profit, 501(c)3 organization that works to ensure the protection of native plants and animals and their habitats throughout North America. Defenders has more than 1.8 million members, supporters and online activists nationwide, including more than 7,800 in New Mexico.

We thank the Santa Fe, Carson and Cibola National Forests (the Forests) for actively prioritizing watershed restoration activities and increasing the capacity of the Forests to restore and revitalize the rivers, streams, wetlands and meadows that are so ecologically valuable in the Southwest. Especially due to our arid climate and the effects of climate change, water is our most valuable resource that not only determines the health of our forests, but our human communities as well.

Centuries of overgrazing, road construction, and logging have wreaked havoc on these delicate ecosystems, yet we have a responsibility to ensure that these areas, which include the headwaters of many river systems that provide drinking water for millions of people, are healthy and resilient. This will require robust restoration activities including restoring natural flow regimes to channelized rivers and streams, raising water tables to spread water out across wetlands that hold water, lower water temperatures, and encourage the growth of valuable grasses and sedges, and planting trees to stabilize stream banks, and limit erosion. Many of these projects will also help create and build habitat for wildlife, including threatened and endangered species, and are necessary for their recovery and long-term stability.

We thank the Forests for identifying and prioritizing many of these activities in the riparian, aquatic and wetland restoration project. If implemented fully and responsibly, these activities have the potential to greatly improve the health of our forests, make them more resilient against the impacts of climate change and build habitat for imperiled species that depend on them.

With this in mind, the scoping document currently does not acknowledge or consider any of the federally listed species including the New Mexico meadow jumping mouse or the southwest willow flycatcher, both of which are riparian obligate species. While many of the activities listed throughout the scoping document, including building instream support structures and planting willows, will create habitat for these species, if carried without mind for how the project implementation could impact these species, the potential exists for projects to have a net negative effect.

To ensure this does not occur, the final environmental assessment should include a list of best management practices that include information about how to prevent harming these species, including avoiding sensitive times of year when they are most active or limiting the footprint of disturbance for certain projects like replacing culverts or constructing enclosure fencing.

Additionally, any restoration work designed to improve habitat for federally listed species should be complemented by surveys for listed species that could be present. This would aid any restoration work being as comprehensive as possible in its effort to restore these ecosystems.

Finally, while the project categories identify beaver habitat restoration at a handful of points throughout the scoping document, it does not include any activities that specifically address beavers, themselves. Traditionally, authority over wildlife management has been left to the states, but there is growing recognition that federal land managers have the obligation and discretion to manage and conserve species that occupy those lands. Federal land managers have considerable powers and statutory duties to manage wildlife on federal lands and therefore should take a stronger role in determining strategies and activities for managing beaver for the benefit of riparian restoration.¹

If the Forests' goal is to restore function to watersheds, they should exercise this authority by finding opportunities to increase the presence of beavers on the landscape. The Forests should consider working with the New Mexico Department of Game and Fish to develop a plan that will lead to the ecological restoration of beavers across the landscape. This would include identifying areas of each forest that would be well suited for beaver translocation due to food availability and limited potential for human conflict as well as identifying high conflict areas from which beavers could be translocated in order to protect individual animals and restore beavers to unoccupied areas that would benefit from their presence.

Currently, the Cibola, Gila and Lincoln National Forests are all closed to commercial and recreational beaver trapping for restoration purposes. In order to realize the full effect of riparian

¹ Nie, Martin and Barns, Christopher and Haber, Jonathan and Lurman Joly, Julie and Pitt, Kenneth and Zellmer, Sandra B., Fish and Wildlife Management on Federal Lands: Debunking State Supremacy (June 5, 2017). Environmental Law, Vol. 47, No. 4, 2017. Available at SSRN: <https://ssrn.com/abstract=2980807>.

restoration efforts, the Santa Fe and Carson National Forests should consider a similar closure to ensure beaver restoration is successful.

Thank you again to the forests for undertaking this project. Riparian, aquatic and wetland restoration will be essential to ensure our forests remain healthy, and by making wildlife a more central focus of the plan, the Forests will be able to take the most comprehensive and holistic approach possible.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Dax".

Michael Dax
New Mexico Representative