

**From:** Hall, Joshua D -FS on behalf of FS-Northern NM Riparian and Aquatic Watershed Restoration  
**Sent:** 7 Nov 2019 16:52:12 +0000  
**To:** Meredith Zaccherio  
**Subject:** FW: Northern New Mexico Riparian, Aquatic and Wetland Restoration Project  
**Attachments:** 19407 Northern New Mexico Riparian, Aquatic, and Wetland Restoration.pdf



**Josh Hall**  
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**From:** Conway, Meaghan, DGF [mailto:Meaghan.Conway@state.nm.us]  
**Sent:** Friday, November 1, 2019 8:56 AM  
**To:** FS-Northern NM Riparian and Aquatic Watershed Restoration <SM.FS.NNMRAWR@usda.gov>  
**Cc:** DGF-EEP-TG <DGF-EEP-TG@state.nm.us>; Auer, Donald, DGF <DonaldP.Auer@state.nm.us>; jacob.davidson@state.nm.us; Charles.Schultz@state.nm.us; Ogburn, Jeff, DGF <Jeff.Ogburn@state.nm.us>; nmesfo@fws.gov  
**Subject:** Northern New Mexico Riparian, Aquatic and Wetland Restoration Project

Dear Mr. Hall,

We appreciate the opportunity to review and provide comments on the Northern New Mexico Riparian, Aquatic, and Wetland Restoration Project. The New Mexico Department of Game and Fish supports the Project. The attached letter details the Department's comments and recommendations in response to the scoping documents.

Please do not hesitate to contact me if you should have any questions.

Sincerely,

Meaghan Conway

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Meaghan Conway

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31 October 2019

Mr. Josh Hall  
ATTN: 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;  
NMDGF No. 19407**

Dear Mr. Hall:

Thank you for the opportunity to provide comments during the scoping process for the *Northern New Mexico Riparian, Aquatic, and Wetland Restoration Project* (Project). The Project proposes design criteria for consistent implementation and monitoring of watershed and aquatic restoration activities on national forests and grasslands within New Mexico. The New Mexico Department of Game and Fish (Department) believes these efforts will facilitate valuable wildlife habitat and watershed improvement efforts by the U.S. Forest Service and a broad spectrum of cooperators. Furthermore, the Department supports efforts to identify compliance-ready practices and management actions on National Forest System lands across northern New Mexico.

The Department supports the Project goals of restoring ecological processes that would create and maintain self-sustaining wetland, riparian, and aquatic ecosystems to enhance wildlife habitat. The Department provides the following recommendations to increase successful restoration efforts and minimize or eliminate negative short-term impacts to wildlife.

The Department recommends prioritizing planting native trees, shrubs, and herbaceous plants to maintain vertical habitat diversity and ground cover after any non-native vegetation removal. The Department also recommends removing trees or using low intensity prescribed fire to maintain stream shading, erosion control, and bank stabilization functions, and to prevent deleterious ash flow into streams. Retaining intact canopy cover and following tree removal with fast-growing native plantings can help alleviate negative short-term impacts. Where management actions include extensive removal of non-native trees, staggering tree removal and native habitat restoration over time can prevent complete loss of non-native woody habitats used by wildlife.

In areas that may no longer naturally support native vegetation, consider implementing streambank and floodplain modifications (e.g., bank softening, bank lowering) following non-native removal to enhance overbank flows and river-floodplain connections that promote

recruitment and survival of native riparian plant communities. The Department also supports using beaver dam analogs to restore natural stream functions, increase water retention, reconnect floodplains, and create and improve wetland, aquatic, and riparian habitat that could support beavers and/or provide increased ecosystem benefits.

The Department encourages prioritizing restoration sites near existing suitable habitat where it would increase habitat connectivity for New Mexico Species of Greatest Conservation Need. The New Mexico Riparian Map, State Wildlife Action Plan, and Department biologists can offer additional species and site-specific guidance during the planning stages. The Department also encourages developing a monitoring strategy that would document restoration effort status and guide adaptive management strategies.

To minimize adverse impacts to migratory bird nests, eggs, or nestlings, the Department recommends conducting ground disturbance and vegetation removal activities outside of the primary migratory bird breeding season for riparian songbirds, generally April 15 - September 1. If ground disturbing and clearing activities during the breeding season cannot be avoided, the area should be surveyed for active nest sites (with birds or eggs present in the nesting territory), and when occupied, nest disturbance should be avoided until young have fledged. For any active nests, adequate buffer zones should be established to minimize disturbance to nesting birds. Buffer distances should be  $\geq 100$  feet from songbird and raven nests, and 0.25 mile from raptor nests. Active nest sites in trees or shrubs that must be removed should be mitigated by qualified biologists or wildlife rehabilitators. These protective measures should be incorporated into best management practices for riparian restoration efforts under this Project.

Lastly, The Department recommends that any stream crossing structures developed are designed to ensure adequate flow, aquatic organism passage, and continuity of riparian vegetation above and below the structures. The Department's Bridge and Culvert Construction Guidelines provide criteria for stream crossing structures to achieve these objectives.

Thank you for the opportunity to review and comment on the proposed Project. The Department looks forward to reviewing and commenting on the forthcoming Draft Environmental Assessment during public comment. If you have any questions regarding this response, please contact Meaghan Conway, Aquatic and Riparian Habitat Specialist, at 505-476-8160 or [Meaghan.Conway@state.nm.us](mailto:Meaghan.Conway@state.nm.us).

Sincerely,



Matt Wunder, Ph.D.  
Chief, Ecological and Environmental Planning Division

MW/mc

cc: USFWS NMES Field Office  
Donald Auer, Assistant Chief, NMDGF Wildlife Management Division  
Jacob Davidson, NMDGF Habitat Manager  
Chuck Schultz, NMDGF Northwest Regional Habitat Biologist  
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