



June 1, 2020

Mr. Joshua Hall  
Ecosystem Staff Officer  
U.S. Forest Service  
11 Forest Lane  
Santa Fe, NM 87501

Re: Northern New Mexico Riparian, Aquatic, and Wetland Restoration Project Environmental Assessment

*Submitted via CARA comment submission system*

Thank you for providing the public with the opportunity to comment on the Northern New Mexico Riparian, Aquatic, and Wetland Restoration Project Environmental Assessment (draft EA). The New Mexico Wilderness Alliance is a nonprofit organization dedicated to the protection, restoration, and continued enjoyment of New Mexico's wildlands and wilderness areas, with thousands of members across the state.

It is encouraging to see that the Forest Service planning for riparian, aquatic, and wetland restoration activities across northern New Mexico. The federal decision-making process is inherently and purposefully intricate and time-intensive to ensure various aspects of our environment are protected from further degradation. These types of restoration activities have the potential to tremendously benefit New Mexico's rivers, streams, wildlife, and recreational values but it is important that they are approved, managed, and completed with adequate protections. We have a few suggestions, detailed below, that we believe will make this project stronger and settle any lingering concerns that these activities will be conducted without due care.

I. Activities taking place in or near Congressionally designated areas and inventoried roadless areas

We appreciate the statements of the Forest Service that activities would be prohibited in or near wild and scenic river segments, Wilderness areas, and inventoried roadless areas. We are concerned, however, that these statements do not appear to be included as a desired condition or other management directive. They are included, it seems, as explanations of the proposed action. For example, page 95 of the draft EA states "No action would be authorized unless it was determined it would maintain or improve wilderness character as a whole..." This statement, and others like it concerning wild and scenic rivers and inventoried roadless areas, appears under the heading "Environmental Consequences." It is possible that this is a simple oversight or a case of confused semantics, but it should be corrected before this project is finalized and signed.

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We urge the Forest Service to include clear management directives in the final decision document that provide clear guardrails for Forest Supervisors to follow and for the public to track. Without clear limitations on projects in Congressionally designated areas it is likely that habitat restoration projects will take longer to be approved due to litigation, despite the goal of this project to streamline these projects.

## II. Prescribed fire

While we recognize the utility of prescribed fire as a tool of the Forest Service's arsenal to conduct restoration projects, we are concerned about the limited research and data available on historic fire regimes within riparian ecosystems and the long term ecological impacts of prescribed fire. For this reason, we encourage the Forest Service to limit the use of prescribed fire only to low intensity fires, rather than low and medium intensity as currently contemplated by the draft EA. There may certainly be research and data published in the coming years that will shed light on the utility of medium intensity fires on riparian habitats but until then the Forest Service should use prescribed fire in limited situations and only at low severity.

The use of low intensity prescribed fires reduces the threat of unforeseen consequences and long-term degradation of the ecosystem meant to be restored. Out of control fires, fires that burn hotter than intended, or burn more material than expected run the risk of causing tremendous long-term post-fire flooding events. This EA will apply to restoration projects across northern New Mexico for years and will allow many chances for adaptive management and application of new tools. We urge the Forest Service to ease into this three-forest-wide EA and allow for learning best practices from experience with a limited number of tools.

Finally, we encourage specifically tailored fire management directives when it is to be used within Congressionally designated areas or inventoried roadless areas. Fire can have a particularly damaging effect on an area's apparent naturalness and it should be analyzed separately and adequately before projects are approved.

Sincerely,

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