

Your Community Voices in the Carson Objection - Pueblo Ridge "Restoration" Project



July 2, 2020

James Duran - Supervisor
Carson National Forest
208 Cruz Alta Rd.
Taos, NM. 87571

Carson Forest Watch

- on behalf of Carson Forest Watch,
- The following is our Objection to the FONSI
& EA for the Pueblo Ridge Project on the Carson National Forest:
- 1) We filed comments on the Scoping & Draft for this project and raised numerous concerns regarding the effects of this proposal on several forest resources.
 - 2) However - the E.A. and decision for this project does not address or mitigate our concerns, and will violate the Forest Plan & NEPA as proposed.
 - 3) NEPA requires a range of alternatives including No Action. Yet the EA only provided 2 alternatives - both of which are similar in their miles of road construction & re-construction areas of trees logged. Impacts to wildlife, soils, watershed and other resources. This violates NEPA and ignores several public comments, including ours, that would have supported careful thinning of smaller diameter trees in Ponderosa & old not constructed miles & miles of damaging road network in this riparian area.
 - 4) We continue to support a cautious, careful tree removal project that greatly reduces the need to build roads and log mature trees in wet mixed conifer stands.

"We abuse land
because we
regard it as a
commodity
belonging to us.
When we see
land as a
community to
which we belong,
we will begin to
use it with love
and respect."

— Aldo Leopold

A Sand County
Almanac

3) Besides violating NEPA regarding failure to evaluate a range of alternatives - This EA violates NEPA Cumulative Impact requirements & provides only a weak analysis of cumulative effects. The cumulative effects of long-term damage to watershed & wildlife from the Roads proposal was not adequate nor did the EA address ATVs & the road network & the short & long-term effect increased ATV use will have on forest resources. The Carson track record on maintaining & enforcing road closures is terrible & there is no assurance it will be effective for this project, either.

6) The EA proposed alternative will negatively impact species of concern that depend upon mature mixed-conifer & pine habitat (the marten (spruce also) Bear, red & white squirrel migratory songbirds, raptors, and many other species - and the long & short-term impacts violate NEPA & Forest Plan requirements to protect these species, & it fails to adequately disclose the real effects of such a large long-term project.

7) The proposal would allow logging on steep slopes - far greater than the Forest Plan Standard of 35-40%. This would require a Forest Plan Amendment which we strongly object to. There was a sound scientific reason for adopting the restrictions on steep slope logging - and the EA fails to provide a scientifically supported rationale for allowing steep slope logging. Reliance upon untested & often not practiced BMP is not sufficient to meet NEPA requirements.

8) Please refer to the objection letter written by Jan Klingel as to the details of our concerns & his recommendations for a true Restoration Project that we would support.
Thank you,
Sincerely, Berde for Carson forest work
Joanne