

State of New Mexico  
Energy, Minerals and Natural Resources Department

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Cabinet Secretary

**Todd E. Leahy, JD, PhD**  
Deputy Cabinet Secretary

**Laura McCarthy**, State Forester  
Forestry Division



10/28/2021

RE: Comments on the Santa Fe Mountains Landscape Resiliency Project

Dear Forest Supervisor:

Thank you for providing me the opportunity to review and comment on the draft environmental assessment for the Santa Fe Mountains Landscape Resiliency Project proposed for Santa Fe National Forest lands.

The EA as written fails to address potential impacts to state and federally listed endangered plants that may occur in the project area or are known to occur in the project area (Chapter 3). How does thinning and mastication, prescribed burns and pile burning, and herbicide applications impact herbaceous sensitive plant populations? What is the impact of reduction in canopy cover on sensitive plants? If the answer is unknown, then population of these plants need to be avoided. 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.

Sincerely,

A handwritten signature in cursive script that reads "Daniela Roth".

**Daniela Roth**  
Botany Program Coordinator

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