



May 12, 2022

Michiko Martin
Regional Forester
333 Broadway SE
Albuquerque, NM
87102

Re: Objection to the Santa Fe Mountains Landscape Resiliency Project Finding of No Significant Impact

Dear Regional Forester Martin:

New Mexico Wilderness Alliance (New Mexico Wild) appreciates the evident work the Santa Fe National Forest staff have put into the Santa Fe Mountains Landscape Resiliency Project. We are well aware of the many challenges facing the Forest Service at this moment, especially in New Mexico. However, we are deeply concerned that the analysis of potential impacts on Inventoried Roadless Areas (IRAs) and wildlife is insufficient to determine that this large project will not have a significant impact on the environment.

I. Required Information

Lead Objector: New Mexico Wild
 Logan Glasenapp
 Staff Attorney
 317 Commercial Ave. NE, Ste. 300
 Albuquerque, NM 87102
 (414) 719-0352
 Logan.glasenapp@gmail.com

Reference to: Santa Fe National Forest
 Responsible Official: Debbie Cress, Forest Supervisor

New Mexico Wild 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. New Mexico Wild has participated in the Santa Fe Mountains Landscape Resiliency Project (SFMLRP) since scoping and submitted a scoping comment, attached, in 2019. We look forward to discussing remedies to our objections with you and the Santa Fe National Forest.

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II. Objection Summary

We are objecting on two grounds. First, the impacts to IRAs are likely significant. Second, the impacts to wildlife, particularly federally-listed endangered and threatened species like the Mexican spotted owl, are likely significant. We believe that recent experience with poorly managed prescribed fires displays the significant, and detrimental, impacts this project could have on these two resources.

III. Link Between Prior Scoping Comment and the Content of our Objection

New Mexico Wild filed a scoping comment on July 10, 2019. Our comment raised concerns with the likely detrimental impacts on IRAs and wildlife. These concerns included how the SFMLRP would preserve the or enhance the wilderness characteristics of IRAs within the project area, and how the Santa Fe National Forest (SFNF) would protect endangered and threatened species in the project area, particularly how the SFNF would abide by the Mexican spotted owl recovery plan. Finally, our scoping comment expressed our concern that a project of this scale, the largest single vegetation clearing and burning project ever proposed on the SFNF, is inadequately evaluated through an environmental assessment (EA) and urging the SFNF to instead study the impacts through an environmental impact statement (EIS).

New Mexico Wild also filed a comment on the draft EA on October 29, 2021. We echoed most of our comments from scoping, but also called for a pause of the process under the National Environmental Policy Act (NEPA) to allow for the adoption of directives, guidelines, and regulations to better meet the Biden Administration's commitments to 30 by 30 and to combatting climate change.

Overall, we are deeply concerned that a project of this scale that will impact numerous resources is not being thoroughly evaluated and explained to the public. A century of fire mismanagement has led to an overload of fuel on our forests, but we do not believe that haste is the best method to correct the errors of the past.

IV. Impacts to IRAs are Likely Significant

We understand that the SFNF intends to apply an exception to the roadless rule that allows for timber activities in IRAs when such activity is needed to reduce the risk of uncharacteristic wildfire. However, many of our concerns remain unaddressed. For example: the EA states that no new or temporary roads will be constructed, but is silent as to the potential for maintenance or reconstruction activities to allow for the use of existing roads, trails, and routes. This is the kind of information that we would expect to see from an EIS.

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The EA also does not provide any support for what the SFNF defines as a “small diameter tree” for purposes of the application of the roadless rule exception. We signaled our concern with the one-size-fits-all approach taken by the SFNF with this project, and must again raise the same concern. If restoration activities must take place within IRAs, they must be done so with much more care, analysis, and proactive thinking than is currently being applied.

Proposed Remedy: Analyze the likely impacts of this project via an EIS to fully understand and mitigate against them.

V. Impacts to Wildlife are Likely Significant

As SFNF notes in the EA, the project area for the SFMLRP includes several protected activity centers (PACs) for the federally-listed Mexican spotted owl (MSO). We have raised our concerns with conducting prescribed burns and thinning in MSO habitat before and must do so again. The recent mismanaged prescribed burn that led to the Hermits Peak fire shows just how much damage can be done, inadvertently, as the result of restoration work gone wrong. The impacts to an MSO population of a prescribed burn that jumps in boundaries would certainly be detrimental to the recovery of the species. Further analysis is needed, and additional guardrails put in place to ensure that any activity taking place under this project truly benefits the overall health of the forest and all of its inhabitants.

Proposed Remedy: Analyze the likely impacts of this project via an EIS to fully understand and mitigate against them.

VI. An EIS is Necessary

There remains significant disagreement between the SFNF and many members of the public about what the best available science supports in terms of both treatments at all and the degree of those treatments. We are concerned that a project of this scale, analyzed through a simple EA, does not give the public the reassurance needed to know that prescribed burns and mechanical- and hand-thinning are truly the best solutions, especially to the degree which the forest proposes to employ these treatments.

We appreciate the goal of addressing conditions that would allow the return of a more natural fire regime on the Santa Fe National Forest. We also appreciate that the risk of extreme fires has been exacerbated by increased fuel loads that exist in part due to previous USFS fire suppression policies. The desire to correct this is understandable, however in the interest of avoiding the risk of new policy prescriptions that may result in additional negative unintended consequences, we respectfully advise additional analysis and caution. We believe this is particularly warranted for this particular issue, due to radically changed environmental conditions associated with mega-



draught and climate change, conditions that have made historic modeling of fire behavior unreliable.

Among the fuller analyses of IRA impacts and a better explanation and defense of these treatment strategies being supported by the best available science, we suggest analyzing the lessons learned from other national forests that have undertaken restoration projects of this size and severity. We are aware that two smaller restoration projects are underway on the Santa Fe very near to the project area, but we think comparing to projects of a similar size, within similar ecosystem types, and, if possible, on forests in the southwest would be more helpful to the public both for transparency's sake and to allow us to provide better and more helpful comments to you.

One confusion caused by the documents provided for this project also shows the need for an EIS at this time. In the "Scoping Issues Addressed" document, the forest asserts that the "relatively large area" covered by this project would be treated over the next 10 to 15 years. However, the draft EA states that roughly 3% of areas with a gradient greater than 40% would be treated per year. This work would, based on our math, take more than 33 years to complete. This kind of confusion, on top of the very sincere and supportable disagreements about best available science, support a need for an EIS, and a more robust public engagement process. An EIS and robust public engagement process would show a renewed commitment to transparency and help many of us better understand—and trust—the forest service.

Proposed Remedy: Analyze the likely impacts of this project via an EIS to fully understand and mitigate against them.

VII. Conclusion

New Mexico Wild fully recognizes the need to address the errors of the past fire regime for the good of our forests. We do not, however, recognize the need to rush into addressing these errors without proper analysis, forethought, and mitigation measures. Catastrophic wildfires seem to be the norm these days, rather than the exception, and we are losing thousands, sometimes millions, of acres of pristine wild land every year. We feel these losses personally. Restoration has a place in forest management, we simply urge the Forest Service to apply a finer lens on restoration plans because one size, in this case, does not fit all.

Sincerely,

Logan Glasenapp

Staff Attorney

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