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3 September 2024

Jennifer McRae
Ecosystem Management Coordination
201 14th Street SW
Mailstop 1108
Washington, DC 20250

RE: Draft Environmental Impact Statement (EIS) for Amendments to Land Management Plans (LMPs) to Address Old-Growth Forests Across the National Forest System (NFS) and Associated Documents; NMERT 3715

Dear Ms. McRae,

The New Mexico Department of Game and Fish (Department) and the Energy, Minerals and Natural Resources Department, Forestry Division has reviewed the Draft EIS for Amendments to LMPs to Address Old-Growth Forests Across the NFS (Draft EIS) and associated documents. This letter represents the Department's official comments regarding the Draft EIS, specifically regarding LMP amendments for NFs in New Mexico.

The primary purpose of the Draft EIS (see page S-1) is "to amend [LMPs] throughout the [NFS] to develop a consistent management framework for conserving, stewarding, recruiting and monitoring old-growth forests. The intent of this amendment is to foster the long-term resilience of old-growth forests and their contributions to ecological integrity across the [NFS]."

As the only NF in New Mexico with documented old-growth forest, the Department supports an amendment of the Santa Fe National Forest LMP to address the conservation, stewardship, recruitment, and monitoring of old-growth forests. Current LMPs do not fully acknowledge the ecological services provided to wildlife by these old-growth forests. Such an amendment is in accord with the Department's guidelines regarding restoration activities in ponderosa pine forests ([Ponderosa Pine Restoration Guidelines to Benefit Wildlife](#)), which emphasize the importance of old-growth trees, including those with interlocking canopies, to many wildlife species.

Thank you for the opportunity to review and submit comments regarding this Draft EIS. Please contact Erin Salano, Terrestrial Habitat Specialist, at erin.salano@dgf.nm.gov or (505) 321-5485 with any questions.

Sincerely,

Michael B. Sloane Digitally signed by Michael B. Sloane
Date: 2024.09.03 16:10:06 -06'00'

Michael B. Sloane
Director, New Mexico Department of Game and Fish

CC: Laura McCarthy
State Forester, Energy Minerals and Natural Resources