



# New Mexico Audubon Council

Representing Four Local Chapters of the National Audubon Society in New Mexico, Conserving and restoring natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity

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***Via e-mail:***

## **RE: Northern New Mexico Riparian, Aquatic and Wetland Restoration Project**

The New Mexico Audubon Council represents almost 6,000 members of the National Audubon Society in New Mexico. We provide public education through Newsletters, evening programs on conservation topics, and field trips to introduce people to and foster a respectful appreciation of nature. The National Forests of New Mexico provide essential habitat for many species of birds, some of them of significant conservation concern both locally and regionally. Our members make use of these Forests for wildlife viewing, recreation, and quiet contemplation of nature.

These comments are in response to the April 2020 Northern New Mexico Riparian, Aquatic and Wetland Restoration Environmental Assessment.

We support most of the actions contemplated in this project and do not intend that our lack of specific support of these individual actions be interpreted as a lack of overall support of the Project. We do have several comments.

1. As we pointed out in our letter, the degraded condition of these habitats is the result of many years of practices that have not prioritized the ecological health of riparian and wetland habitats relative to grazing, timber, and other resource extractive uses of the Forests. In light of this observation, we are very concerned that the monitoring section (pp B-7-8) calls only for a "walk through" post-assessment. There is no provision for long-term assessment of the efficacy of the proposed projects. This is exactly why these habitats are degraded, because there is no effective long-term monitoring of forest restoration activities. A comprehensive plan for long-term monitoring is an essential element of the restoration activities proposed. If, for example, the off-channel water sources are not successful in diverting livestock from riparian areas and meadows, no progress will have been made. As we mentioned in our earlier comments, it is important that these be in place and of **demonstrated** effectiveness before expenditures on stream bank stabilization and riparian vegetation are contemplated or these latter actions will be of only short-term benefit.

2. We are pleased to see that conservation measures are indicated for all actions and projects and consolidated in Appendix B. this greatly increases the coherence of the document.

3. Our greatest concern with this proposal has to do with the management and protection of resident and migratory birds and their habitats . As we mentioned in our last letter, the legal and regulatory requirements are quite clear.

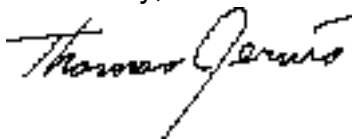
Specific Conservation measure migratory Birds 1, General conservation measures 13 (Birds 2). And 14, (Birds 3) address these issues and are together a significant advance over past USFS practice. We applaud the intent of these measures and the attention given to these issues, which we have raised with respect to any number of Forest Service proposals on which we have commented. However, we feel the need to caution that once they begin nesting, bird's nests are notoriously difficult to find (many stop singing) and their nests are generally very well camouflaged.

Vegetation management activities of almost any kind are disruptive to the essential ecological process of reproduction for all wildlife but particularly for birds. We note with approval that earthmoving activities will be performed primarily in the fall/winter and that "treatments would be implemented outside of the nesting season to minimize impacts on migratory birds, especially in brush/shrub areas, riparian areas, along cliff faces, and rock features." Avoidance of potential negative impacts is far preferable to mitigation.

4. Finally, we note that surveys for the presence/absence of T&E species have been incorporated into the Conservation Measures.

We thank you for the opportunity to comment on this proposal and ask that we continue to be informed as the analysis process proceeds. We are delighted to be able to support a project that addresses many longstanding problems with riparian areas on the Forests and does so in a way that recognizes the needs of birds and other wildlife.

Sincerely,



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