



October 29, 2021

Debbie Cress
Forest Supervisor
Santa Fe National Forest
11 Forest Lane
Santa Fe, NM
87508

Re: **Santa Fe Mountains Landscape Resiliency Project**

Submitted via the CARA comment portal

Dear Ms. Cress,

Thank you for the opportunity to provide input on this important, if not a bit controversial, project. New Mexico Wilderness Alliance (New Mexico Wild) is a non-profit organization dedicated to the protection of our state's wilderness, water, and wildlife, with thousands of supporters across the state.

Below we provide narrowly focused comments on the potential impacts to IRAs, the need to avoid Thompson Peak entirely, and the need for this project to be analyzed through an environmental impact statement (EIS) rather than an EA. We have also helped draft and have therefore signed onto organizational comments submitted by our conservation partners.

We submitted scoping comments on July 10, 2019, detailing our concerns with several deficiencies with the scoping documents including: a lack of information regarding the impacts to IRAs, a lack of reasoning for the boundaries of this project, a lack of information regarding any consultation required under the Endangered Species Act, and a lack of information addressing the impacts on the public's use and enjoyment of the project area. We are pleased to see several of these concerns addressed, but we are still confused about the boundaries of this project, and how those lines were drawn. As we noted in 2019, the project purports to address concerns of the Greater Santa Fe Fireshed, but many acres of the project area are outside of the Fireshed while many acres of the Fireshed are not included in the project area. These discrepancies raise concerns that the purpose and need for this project is incongruous with the actual strategy contemplated.

Need for a Pause

We are at a turning point in this country as the federal government begins to take seriously the dual threat of the climate and extinction crises. We saw within the first few weeks of this administration, a commitment to 30x30 goals, followed up by the America the Beautiful report.

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We have also seen recent reporting that the United Nations, as well as the Intelligence community of the United States, now recognize that climate change threatens every aspect of human life. Given these new commitments, and recent developments in the understanding of the precipice upon which we stand, there is a dire need for the Santa Fe National Forest to pause this National Environmental Policy (NEPA) process until there are clear directives, guidelines, and hopefully regulations in place to guide decision-making under a new climate-focused approach. Blazing ahead on a project that will have immediate impacts on air quality, wilderness qualities, and threatened and endangered species would be the wrong choice at this time.

This project needs to be analyzed through an EIS

There is significant disagreement between the Santa Fe National Forest 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 hope that you will forgive us for being somewhat skeptical, but given the century of extreme fire suppression, a tactic that the forest service now agrees was wrong for forest health, we must ask for a full analysis of this restoration project before any work begins.

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 would be very 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.

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Potential NEPA and Roadless Rule Violations

NEPA

The Santa Fe's proposed approach in this restoration project, specifically the choice to not define specific treatment units at this time, is likely in violation of NEPA. This lack of specificity would be understandable if the forest were proposing a programmatic EIS, followed up by site-specific project EAs for each treatment proposed. Without this overarching programmatic EIS, this EA lacks the hard look analysis required by NEPA and places far too much discretion in the hands of district rangers and other members of your staff.

Before this project is approved, the Santa Fe *must* provide more specific details, preferably site-specific details, to the public and allow for a new public comment period. These details must include: where thinning versus prescribed burn treatments would be used, where and how many acres would benefit from wildlife habitat improvement treatments, the location and status of existing roads to access treatment areas, the miles of streams in the project area, and the cost of this project. While we recognize that the Santa Fe does not have complete information regarding resource conditions on every acre in the project area, we fail to understand how that excuses the complete lack of transparency or effort to compile that information. We cannot support, and will likely challenge to the extent practicable, any approval of this project without "complete information regarding the conditions found on every acre of the project footprint[.]" EA at 29.

This lack of information is likely the best evidence available that this project needs to be analyzed via EIS rather than EA. *See Southeast Alaska Conservation Council, et al. v. U.S. Forest Service*, 443 F. Supp. 3d 995 (D. Alaska 2020) (rejecting an EIS for a project with a similar lack of information).

IRAs

Of similar concern, and with a similar dearth of information, is the Santa Fe National Forest's approach to thinning and burning within IRAs. The EA documents do not appear to state, and completely fail to analyze, under which exemption of the roadless rule this project is purported to fall. Information and analysis is also deficient or entirely absent for how this project will not have significant effects on these IRAs and how precisely a 16" dbh limit sufficiently keeps thinning treatment to generally small diameter trees. The most glaring deficiency in this EA, however, is the complete lack of any analysis and supporting evidence for how this project would maintain or improve one or more of the roadless area characteristics.

Besides the legal deficiencies in this project, we want to note the several moral and conservation deficiencies. As we look towards the future of conservation in this country, keeping hopeful with

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the new federal and state commitment to 30x30, we must urge you to keep this project out of all IRAs across the Santa Fe National Forest. IRAs provide some of the best opportunities for future wilderness designations, and often meet the apparent naturalness and opportunities for solitude requirements just by the simple fact that they are roadless. Any unnatural work undertaken to “restore” these areas runs the risk of fundamentally and permanently destroying their natural appearance.

Recognizing that it is unlikely for the forest to make such a significant departure from its draft EA, we must request two far simpler solutions in the alternative. First, prepare an EIS for this project to specifically address and more fully analyze the potential impacts to these IRAs, including the wildlife that are found on them, and two, while preparing this EIS analyze a third alternative that would only treat non-IRA areas within the project area. We likely could support restoration around and near wildland urban interfaces, but at this time cannot support the level of work proposed in this project in IRAs.

Since you are recommending it for wilderness designation in your proposed forest plan, we must strongly urge you to completely avoid the Thompson Peak IRA. Even with the best intentions, accidents or errors in the planning could result in the permanent marring of the Thompson Peak area and lead Congress to not act on a designation. This area is valuable both on its own and as an expansion of the Pecos Wilderness and would also have the added benefit of somewhat buffering the Santa Fe Watershed from encroachment of public infrastructure in the future.

We note that the other IRAs are included in Alternative C of your proposed final forest plan, as well as the citizens proposal we submitted many years ago. As our objection will state, and we will discuss in the future, the areas recommended in Alternative C deserve to be recommended in your final plan. Given this position, and the very real need to recommend a larger number of areas for designation, we think it inappropriate to continue with the SFMLRP planning process until the final forest plan is signed and in place. Anything else would indicate to the public that the objection process is really just a meaningless exercise to appease those committed enough to stay engaged in the process.

Simply put, one size cannot fit all in this case. We recognize that tree thinning would be limited in specific ways within Mexican spotted owl (MSO) protected activity centers (PAC), and then mechanical treatment would be limited to slopes with less than a 40% gradient. So clearly, the Santa Fe is aware that one size does not fit all. We urge you to consider additional mitigation measures to protect the roadless and wild characteristics of these areas, including: no mechanical treatments, period; a similar limit to tree diameter size for thinning treatment as the limit proposed for MSO PACs; and a recognition and analysis of the best available science for forest health *in wild and untouched areas*. Our concern is that the best available science to protect human

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infrastructure in and near wildland urban interfaces does not offer the best results for forest health in wild and roadless areas.

Analysis and Disclosure of Alternative Available Science

There are many well-researched and supportable forest health opinions contrary to the scientific opinions used as the foundation of this project. In fact, we know that the Santa Fe received numerous scoping comments highlighting in great detail alternative scientific positions on forest health. We are concerned that a bias towards achieving the goals of this project was applied when the decisionmakers reviewed the available science on this topic. For example, as we've already said, one size does not fit all and the science of forest health and fire prevention for the WUI is vastly different than the science for wildland forest health. Some research indicates that a heavier reliance on prescribed burns results in reduced net carbon release as opposed to a heavier reliance on thinning, while other research indicates the opposite. All of these different supportable positions could have been analyzed and dismissed or adopted if the Santa Fe had done the right thing here and initiated an EIS review. As it stands, it appears that the "best available science" used to defend this project was subjectively and specifically selected because it supported the goals and strategies from the outset, rather than letting the science instruct the Santa Fe National Forest on what those goals and strategies ought to be. We again urge you to initiate an EIS review of this project to thoroughly and publicly analyze the available science on forest health, climate change, and a healthy fire regime before continuing to exert human influence on natural processes.

Conclusion

We cannot support the SFMLRP at this time and urge you to make the changes to the project requested above. Further, we urge you to better engage with the public on these kinds of projects moving forward. Among other strategies to better engage the public, we urge you to avoid in the future overlapping public comment and objection periods for projects that the forest knows are important to many users of the forest.

We are happy to discuss these comments more fully with you, as we have always valued the relationship we have with the Santa Fe National Forest. Please include this letter in the project record.

Sincerely,

Logan Glasenapp
Staff Attorney
New Mexico Wild

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