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Comments: November 1, 2021

Regional Forest (Reviewing Officer) Southwest Regional Office

Attn: Santa Fe National Forest 333 Broadway SE

Albuquerque, NM 87102

Submitted via the CARA submission portal
RE: Objection to proposed Final Plan and Final Environmental Impact Statement, Santa Fe National Forest
Dear Reviewing Officer:

New Mexico Wilderness Alliance (New Mexico Wild) appreciates the evident work you and your staff have put into the forest planning process and your attempt to achieve the multiple use mandate under which you steward the Santa Fe National Forest. We understand that you, like many of us, were forced to do a tremendous amount of difficult work while balancing a global pandemic and the unprecedented impacts of climate change already affecting the Santa Fe National Forest. That being said, we remain gravely concerned that the proposed recommend wilderness areas are too few and the process by which they were determined was flawed, at best, and in violation of forest service regulations at worst.
I. Required Information
Lead Objector: New Mexico Wild

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logan@nmwild.org 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[rsquo]s wildlands and wilderness areas, with thousands of members across the state. New Mexico Wild has participated in the Santa Fe National Forest

planning process and has submitted comments on several occasions, including on the Draft Environmental Impact Statement (DEIS). We hereby formally submit an objection to the Final Forest Plan, Final Environmental Impact Statement (FEIS), and the draft Record of Decision (ROD) for the Santa Fe National Forest. We look forward to discussing remedies to our objections with the Santa Fe National Forest.

II. Objection Summary

We are objecting to one single plan component: the arbitrary and out of conformity parameters of recommended wilderness process, namely, the requirement that areas be adjacent to or contiguous of designated Wilderness and the disqualification of areas that the forest deemed in need of restoration. We believe that naming hoped-for restoration as the management hurdle to managing these areas as wilderness is in violation of the 2012 planning rule and that ultimately the plan does little to respond to and plan for increases of severe climate change impacts.

III. Link Between Prior Substantive Formal Comments and the Content of Our Objection

New Mexico Wild, along with several conservation partners filed a substantive formal comment on the DEIS and Draft Forest Plan in November of 2019. Our comments included concerns with the recommended wilderness process, the range of alternatives, and the anemic nature of the preferred recommended wilderness alternative. None of these concerns were assuaged by the final plan, and new information concerning the 30x30 initiative has in fact newly enflamed those concerns.

IV. Wilderness Recommendations

Put simply, the wilderness recommendations of the proposed alternative are unacceptable considering the dual threat of the climate crisis and the extinction crisis. The Santa Fe National Forest National Forest has an opportunity, right now, to make significant strides towards greater conservation, but instead is proposing what looks like and in practice will closely resemble a logging, thinning, and burning plan. By recommending additional areas, preferably the total number within Alternative 3, in this plan revision, rather than waiting for the next round of revisions in 2050-2060, the Santa Fe National Forest preserves the status quo and ensures that critical and fragile wilderness values, climate benefits, and wildlife are not harmed.

A. The recommended wilderness process violates the 2012 planning rule

We are aware, as most folks are that have been working on forest issues for the last few years, that a regional priority has been set on forest restoration through thinning, prescribed burning, and other treatments. We understand that at certain intersections, primarily in Wildland Urban

Interfaces, fuels need to be reduced and wildfire threats mitigated to the extent possible to protect developed infrastructure and dwellings. We struggle, however, to understand why this prioritization must inherently lead to fewer wilderness recommendations. By limiting the preferred alternative[rsquo]s recommended wilderness areas solely to those with [ldquo]no untenable tradeoffs identifies in the analysis,[rdquo]1 including high need for restoration treatments, the Santa Fe has created a preferred alternative in violation of the 2012 planning rule.

In fact, using idealistic restoration goals as the basis for recommended wilderness decisions may be in violation of Forest Service regulations. It is your responsibility to [ldquo]ensure that the planning process, plan components, and other plan content are within[hellip]the fiscal capacity of the unit.[rdquo] 36

C.F.R. [sect] 219.1(g). Without a clear budget, the kind of sweeping restoration envisioned by this plan appears to be outside the fiscal capacity of the unit. As you are well aware, the maintenance backlog across the Forest Service is staggering at the moment, the Santa Fe National Forest is part of a proposal to increase or create new fees at certain developed recreation sites, and Congress seems to cut or leave the Forest Service budget to stagnate every year. Recommended wilderness areas provide a management tool, not a management obstacle, by allowing you to take a hands-off approach to areas so remote they present little to no risk to developed infrastructure should a fire start. We urge you to take a step out of the Forest Service[rsquo]s comfort zone and think about the long- term health of our forest, its wildlife inhabitants, and the climate benefits we receive statewide by leaving larger areas untouched by the human species.

The forest supervisor has the authority to make exceptions to the management priorities and directions of recommended wilderness, especially to allow for restoration activities. But considering the Forest Service[rsquo]s limited, and seemingly ever-decreasing, budget, and the idea that the forests are planning for 100 years of restoration work, we are deeply concerned that extractive industries, motorized recreation, and other trammeling

effects will be allowed to run rampant across areas the forest itself evaluated as moderate to high for their wilderness values.

We proposed in our comments on the DEIS, and more strongly urge now, a shift in agency thinking at this critical moment in our history. Rather than see the need for restoration as a preclusion to recommendation, the forest should prioritize protection now, immediately, and consider exceptions on a case-by-case basis to allow for restoration when the budget allows. Anything else would be a miscarriage of your job as stewards of our forests and public resources and prioritize what, at this moment, is a 100-year pipe dream. The Santa Fe National Forest is all but abandoning 245,000 acres of wilderness quality land in the hopes that the budget allows for restoration on a scale heretofore unseen in the region.

The Santa Fe National Forest[rsquo]s sacrifice of moderate and high quality wilderness lands in the hopes of restoration is an abuse of your discretion. We recognize, of course, that the 2012 planning rule allows for a shocking amount of discretion on behalf of the responsible official. However, restoration goals present no actual management trade-offs. The 2012 planning rule[rsquo]s discretion does indeed cut both ways: the responsible official is also tasked with creating plan components for the [ldquo][p]rotection of[hellip]areas recommended for wilderness designation to protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation.[rdquo] The responsible official has the discretion to create plan components for recommended wilderness that allow for restoration activity, when that project has been fully vetted through a separate NEPA process.

Finally, as we said in previous comments, we are concerned that the thinning and burning proposals and projects the Santa Fe National Forest has undertaken thus far are not based on the best available science. We do not agree that restoration activities are appropriate in places so deep in the forest in the heart of roadless areas with highly valued wilderness characteristics. We believe there is an overstatement of the need for thinning in the plan, particularly evidenced by the lack of any cost-benefit analyses comparing restoration activities in wildland urban interfaces (WUIs) to those same activities in roadless and wild areas. As we[rsquo]ve said, we are deeply concerned that what the forest is proposing in this plan is an unrealistic objective without the resources or capacity within the Forest Service to conduct the scale of thinning in these roadless areas.

Preferred Remedy: To address this abuse of discretion, and violation of Forest Service regulations, the following recommended wilderness areas should be included in the final forest plan:

[middot] All 21,849 acres of the Thompson Peak Recommended Wilderness Area

[middot] Enchanted Lakes Recommended Wilderness Areas P88A and P88B

[middot] Ca[ntilde]one[rsquo]s Creek Recommended Wilderness Area

[middot] Mesa Alta Recommended Wilderness Area

[middot] Wolf Draw Recommended Wilderness Area

[middot] Pollywog Recommended Wilderness Area

[middot] Black Canyon Recommended Wilderness Area

[middot] Tesuque Creek Recommended Wilderness Area

[middot] Rio Nambe Recommended Wilderness Area

[middot] Guaje Canyon Recommended Wilderness Area

[middot] Rio Medio Recommended Wilderness Area

[middot] Arroyo de la Presa Recommended Wilderness Area

[middot] Polvadera Recommended Wilderness Areas E53A and E53B

[middot] El Invierno Recommended Wilderness Area

[middot] Cerra Boletas Recommended Wilderness Area

[middot] Alamo Canyon Recommended Wilderness Area

[middot] Bearhead Peak Recommended Wilderness Area

[middot] Cochiti Canyon Recommended Wilderness Area

[middot] Virgin Mesa Recommended Wilderness Area

[middot] Burro Basin Recommended Wilderness Area

[middot] Sapella Recommended Wilderness Area

[middot] Johns Canyon Recommended Wilderness Area

[middot] Cowles and Wesner Spring Recommended Wilderness Area

[middot] Grass Mountain Recommended Wilderness Area

[middot] Ca[ntilde]ada Corral Recommended Wilderness Area

[middot] Lost Lake Recommended Wilderness Area

[middot] Maestas Recommended Wilderness Area

[middot] Bartley Recommended Wilderness Area

[middot] Falls Recommended Wilderness Area

B. The requirement that areas be adjacent to or contiguous with designated Wilderness is arbitrary
The forest[rsquo]s proposed alternative, and its preferred alternative in the DEIS, recommended only areas that

are adjacent to or contiguous with designated Wilderness Areas with no stated management or protection rationale. This requirement led to the arbitrary disqualification of several high quality wilderness areas of sufficient size for designation. We raised this issue in our comments on the DEIS, but the forest dismissed it without much discussion.

We recognize that the forest supervisor has a shocking amount of discretion in certain aspects of forest planning, but surely deciding that isolated wilderness quality lands should not be protected for their wilderness characteristics simply because they are isolated is a step too far.

Preferred Remedy: To address the abuse of discretion and arbitrary decision-making, the following recommended wilderness areas should be included in the final forest plan:

[middot] Enchanted Lakes Recommended Wilderness Areas P88A and P88B

[middot] Ca[ntilde]one[rsquo]s Creek Recommended Wilderness Area

[middot] Wolf Draw Recommended Wilderness Area

[middot] Pollywog Recommended Wilderness Area

[middot] Black Canyon Recommended Wilderness Area

[middot] Tesuque Creek Recommended Wilderness Area

[middot] Guaje Canyon Recommended Wilderness Area

[middot] Arroyo de la Presa Recommended Wilderness Area

[middot] Polvadera Recommended Wilderness Areas E53A and E53B

[middot] El Invierno Recommended Wilderness Area

[middot] Bearhead Peak Recommended Wilderness Area

[middot] Cochiti Canyon Recommended Wilderness Area

[middot] Virgin Mesa Recommended Wilderness Area

[middot] Burro Basin Recommended Wilderness Area

[middot] Ca[ntilde]ada Corral Recommended Wilderness Area

C. New information warrants a review of the recommended wilderness proposal i. 30x30
New information warrants a renewed wilderness recommendation analysis. On January 27, 2021, President Biden signed Executive Order 14008, Tackling the Climate Crisis at Home and Abroad.2 This Executive Order, among other ambitious goals, committed the administration to preserve 30% of lands and waters by 2030, often

referred to as 30x30. The Executive Order was followed by the publication of the America the Beautiful report in May.3 These new commitments and goals, published in the interim between your draft forest plan and the publication of the proposed final plan, warrant a new analysis of at least the recommended wilderness components. We said as much in a letter to Forest Service Chief Randy Moore, which we sent to a number of officials within the United States Department of Agriculture, the Forest Service, and all forest supervisors in New Mexico.4

We acknowledge that at present the definition of [ldquo]conserve[rdquo] within the context of 30x30 is undefined. What is almost certain, however, is that designated Wilderness areas, with their emphasis and prioritization on natural processes and limited human interaction, will count towards the 30% goal. Again, we are asking for a paradigm shift in agency thinking. Rather than wait for guidance from the Washington or regional offices, the Santa Fe National Forest can protect large swaths of land now by adopting the wilderness recommendations from Alternative 3. As we said above, this would in fact preserve the status quo while the forest waits for further guidance. What would be supremely disappointing to all forest users is if you sign the proposed final plan and record of decision as is and then receive guidance from the Washington or regional offices directing all national forests to prioritize wilderness recommendations in all forest planning.

No one knows what the future holds for agency culture and priorities. What we know, however, is that right now and in the future, the existential threat of human-driven climate change must be addressed. We cannot wait for the molasses drip of the federal bureaucratic process to make common-sense decisions that will best prevent the increasingly severe impacts of climate change. We urge you to significantly increase the recommended wilderness areas in your final plan to give our children and grandchildren the greatest possible chance to have a fighting chance in the future.

Somewhat complementary to and complemented by the overall 30x30 goals, wildlife connectivity and species protection must be given a higher priority by the Santa Fe National Forest at this time. We raise our concerns, again, with the prioritization of restoration for areas that may not be feasibly mechanically treated or the budget may not allow for restoration at this time. Managing areas as wilderness provides immediate and meaningful protection to forest species by preventing the trammeling effects of mechanized and motorized vehicles, commercial activity, and deforestation. We suggest, yet again, that the agency-preferred wait-and-see approach is inapposite to forest stewardship.

Preferred Remedy: To greatly benefit species including game, non-game, and threatened and endangered species the following recommended wilderness areas should be included in the final plan:

[middot] All recommended wilderness areas in Alternative 3 that would add to the Pecos Wilderness Area, including:

- All 21,849 acres of the Thompson Peak Recommended Wilderness Area
- Rio Nambe Recommended Wilderness Area
- Rio Medio Recommended Wilderness Area
- Sapella Recommended Wilderness Area
- Johns Canyon Recommended Wilderness Area
- Cowles and Wesner Spring Recommended Wilderness Area
- Grass Mountain Recommended Wilderness Area

o Lost Lake Recommended Wilderness Area

o Maestas Recommended Wilderness Area

o Bartley Recommended Wilderness Area

o Falls Recommended Wilderness Area

o The Pecos is the quintessential New Mexico mountain wilderness[mdash]high, wide, and beautiful, a wonderland of wildflower-filled meadows, alpine lakes, dark conifer forests, shimmering aspen groves, many of the state[rsquo]s highest mountains, and abundant wildlife. The Pecos is the source of the Pecos, Mora, Rio Pueblo

and Gallinas rivers. Its 150 miles of streams and more than 15 lakes are part of a watershed that is essential to surrounding communities and the acequia systems that irrigate the lands. Unfortunately for the many roadless areas around the designated wilderness, human activities such as mining, drilling, fracking, road construction and timber harvests[mdash]activities which have degraded water quality, affecting major watersheds like the Upper Pecos, the Rio Grande and the Gallinas[mdash]have the potential to cause further harm. Incorporating these roadless areas into the Santa Fe[rsquo]s final wilderness recommendation could protect an additional 78,978 acres from future degradation and irreversible harm.

* Cerra Boletas Recommended Wilderness Area
* Alamo Canyon Recommended Wilderness Area
* Mesa Alta Recommended Wilderness Area

Secondary Preferred Remedy: The Santa Fe National Forest conducts an analysis of the contributions to greenhouse gas pollution, impacts to threatened and endangered species, loss of carbon sequestration, particulate pollution, and other associated environmental impacts of thinning and burning the millions of acres of forest, as envisioned by the plan.

V. Conclusion

These issues are vitally important as they will directly impact the success or failure of our collective efforts to combat the increasingly severe impacts of climate change for the next three decades, and potentially longer if these roadless and wild areas are lost. Thank you for considering our objections and recommended remedies. We look forward to meeting with you shortly to discuss the issues we have raised and find equitable solutions that will benefit everyone and ensure the forest service finalizes this plan in conformity with the 2012 planning rule.