

Imler-Jacquez, Sandra R -FS

From: BRENT THOMPSON <dockrs21@gmail.com>
Sent: Wednesday, December 11, 2019 12:02 PM
To: FS-comments-southwestern-santafe
Subject: Encino Vista Landscape Restoration Project

Hello,

I have some comments & concerns with aspects of the proposed project.

--I am cautiously optimistic that work within the footprint of proposed project can alleviate some concerns regarding possible catastrophic wildfire happening within the footprint. The prescription of prescribed fire is especially encouraging.

--In the Purpose & Need, it is stated that Roads are in poor condition and likely contributing to erosion in area; No new roads should be built to accomplish anything related to the project. Furthermore, any roads deemed necessary should be rehabilitated to accommodate increased traffic before any heavy equipment is on the roads. Reduction of roads within the project area, and forest in general, will thereby reduce siltation and infill of streams, as well as increase the quality of available water supply to the forest and adjoining communities.

--No new roads should be constructed. No information is given as to how many actual miles of "temporary roads" other than '5-10 miles', nor is any information given as to how these potential roads would be reclaimed/rehabilitated when project is complete, nor what timeline this restoration would happen in. The ranger district should administratively close the roads within the project area during the winter time to lessen the impact that careless forest users cause to open roads during this timeframe.

-- I applaud the FS for using alternative means ('small ruminant animals - GOATS) to control less desirable vegetation. However, no prescription is given for number, duration, time of year of animals to be used within the project area. These animals should be as minimally as possible in numbers and rotated on a schedule that does not allow them to denude the forest of all vegetation.

--Re: Conifer removal w/in meadows & aspen should be done by sawyers only and felled trees should be bucked up for removal by hand crews. No machinery should be allowed to trample within these precarious ecotones.

--No tree removal should occur during the MSO and goshawk breeding timeframes; especially within known PACs or other sensitive areas. Tree removal should be minimized during MBTA-related migratory birds also. Timber harvest within slopes >40% should not be allowed, nor within Wilderness or Study Areas. Comments regarding the guideline to 'Strive to retain trees greater than 24 inches is too vague and arbitrary! The current comments should be retained and possibly have wording added to retain conifer spp. at >21 in. DBH, and oak spp. at >15ft tall (or the like) as these types of tree tend to be taller than wider as they age.

-- possibly fencing off (or other means of prohibiting livestock/recreation users) areas of Riparian & meadows should be considered. Using natural vegetation within the area to construct fences should be considered as this can accomplish the fencing-out goal, as well as a means to remove woody biomass from the vertical structure. After a pre-determined time of allowing the riparian/meadows/aspen to regenerate, the "natural" fencing could be set afire as a prescribed/pile burn.

--The FS should consider implementing phase-out of all petroleum based lubricants for chainsaws and feller-bunchers, as they use large amounts of this ecologically degrading material. This project should also consider stipulating this requirement for any sub-contracted company that may be brought on to do vegetation removal work. Nowak et al (2019).

Nowak, P., Kucharska, K., & Kamiński, M. (2019). Ecological and Health Effects of Lubricant Oils Emitted into the Environment. *International journal of environmental research and public health*, 16(16), 3002.

--No mention is made regarding soil disturbance during peak Jemez Mountains Salamander surface activity. There should be prescriptions added to account for this Endangered species.

--No best management practices mentioned regarding the minimization of amphibian Chytrid fungus spread due to heavy equipment use. a protocol regarding this should be implemented as well.

--no mention of eradication efforts related to invasive plant species. Please add prescriptive language regarding invasive/exotic plant species.

Thank you,
Brent.