

Imler-Jacquez, Sandra R -FS

From: Sarah Hyden <sarah.hyden@me.com>
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To: FS-comments-southwestern-santafe
Subject: Encino Vista Landscape Restoration Project

December 19, 2019

Rich Nieto, District Ranger
Coyote Ranger District
HC-78, Box 1
Coyote, NM 87012
Submitted electronically via comments-southwestern-santafe@usda.gov

Scoping Comments for the Encino Vista Landscape Restoration Project

Dear Mr. Nieto,

I am respectfully submitting these comments to the U.S. Forest Service concerning the scope of the agency's analysis under the National Environmental Policy Act (NEPA) of the Encino Vista Landscape Restoration Project across approximately 128,400 acres within the Coyote Ranger Districts on the Santa Fe National Forest.

I. General comments:

The Encino Vista Landscape Restoration Project is located on the Coyote Ranger District of the Santa Fe National Forest south of the communities of Cañones, Youngsville, Coyote, and Gallina, New Mexico. The project boundaries encompass over 128,400 acres of which 119,767 acres are national forest lands. The project area overlaps thirteen HUC 12 sub-watersheds. The majority of the project is within these sub-watersheds: Coyote Creek, Cañones Creek, Headwaters Rio Puerco, Poleo Creek, Outlet Rio Puerco, Upper Rio Galina and Rio Capulin.

The project area is situated between the elevation of 6,450 and 10,600 feet. The area includes piñon/juniper woodlands, ponderosa pine, mixed conifer, aspen and spruce-fir forest types.

It includes essential habitat for many wildlife species, including several endangered or at-risk species including Mexican spotted owl, Northern goshawk, New Mexican meadow jumping mouse, Southwestern willow flycatcher, Jemez Mountain salamander, and Rio Grande cutthroat trout.

The project area is an ecologically diverse treasure and valued by many local residents for recreation.

The Proposed Action envisions thinning treatments on a total of up to 88,400 acres of the project area. It envisions prescribed burning on a total of up to 110,213 acres, and maintenance burning would occur in areas treated with prescribed fire at 5-20 year intervals. This is the largest project ever proposed in the Santa Fe National Forest. Only 22,225 acres of forest would be managed for old growth characteristics.

An Environmental Impact Statement *must* be prepared. The Encino Vista Landscape Restoration project, including the proposed Forest Plan amendment, “may” have a significant impact on the environment, and thus the Forest Service must prepare a robust EIS, ensuring that it complies with NEPA’s required “hard look.” The EIS must analyze the baseline conditions of the project area, and the direct, indirect and cumulative impacts of the proposed timber management activities, road construction and maintenance, and all other activities. The public must be fully included in the project planning process.

Sufficient notice of the project and the comment period was not given. Very few people in the Santa Fe area, where most of the forest protection advocates focused on the Santa Fe National Forest reside, were aware of the project and the ongoing comment period until the comment period was half way complete. There was no notice placed in any newspaper, and the notice was only put out on a very limited mailing list. I strongly suggest the USFS start over on the scoping comment period and put out proper notice so all citizens and conservation groups who are interested will have time to write comprehensive scoping comments.

The best available scientific information (BASI) must be utilized in project planning, and the U.S. Forest Service is require to explain how it met this mandate. There are numerous studies that support a much more conservationist approach to managing the Encino Vista project area that have not even been considered. The USFS must consider a broad range of best available science.

While the SFNF’s lower elevations were historically dominated by low-severity fire, there was an under-appreciated and substantial moderate severity and high severity fire component. This forest evolved in a mixed intensity fire regime, and all intensities of fire are important for maintaining ecological processes and integrity. Moderate and high intensity fire should be considered as natural to our forest ecosystem and no attempt should be made to exclude them except for the safety of important values such as human lives (egress from communities and forest recreational areas) and structures. Research shows that medium and long-term the effectiveness of watersheds is not substantially impaired by fire, even high intensity fire.

The model framework the USFS is using is found in GTR-310, a framework developed primarily in and for an entirely different eco-region, focused primarily in reference study sites around Flagstaff. It is appropriate for use for the SFNF. A more appropriate and region-specific framework must be developed. Please provide examples of where the desired condition has been achieved. It is important that areas in which the desired condition have been achieved be evaluated.

Planning treatments based on general landscape categories such as Ecological Response Units is not nearly targeted and strategic enough, and is a broad stroke way of planning that is likely to result in much ecological damage. These days, in cancer treatment, therapies are no longer broad poisoning of much of the system, but targeted and strategic, and often have a much more positive outcome with much less adverse effects. This should be emulated. The forest is not “ill” in a way that it cannot largely recover from through its own regenerative processes.

Forest that were treated with mechanical thinning in fuel treatment projects that have occurred recently and in the more distant past in the Santa Fe National Forest, and subsequently treated with prescribed fire periodically are not healthy forests and do not in any way resemble historical forests. Forest fuel treatments must be re-evaluated and done in a much more limited, light-handed and strategic way, if a comprehensive cost/benefit analysis indicates that it is beneficial that they be done at all.

There must be a strong focus on connectivity, and on preserving the forest as free of adversely impactful interventions as possible. Much more acreage of forest should be managed for old growth characteristics.

No amendment should be made of the existing Forest Plan for this project relating to Mexican Spotted Owl. The Encino Vista Landscape Restoration Project directly contradicts the current injunction on logging activities in Mexican Spotted Owl habitat. It is highly disappointing that the USFS is proposing to contradict an existing court ordered injunction. This should not occur.

The USFS must consider an alternative that truly conserves and protects the SFNF while focusing on fire moderation from the home and other values outward. The Proposed Action does not go nearly far enough in conserving forest ecology and resources. Also, it is essential to incorporate into the project the major elements from the Santa Fe Conservation Alternative, submitted by WildEarth Guardians, Defenders of Wildlife and Sierra Club for the Santa Fe Mountains Landscape Resiliency Project. It is equally applicable to the Encino Vista Landscape Restoration Project, and included below.

Please use the principles of the Santa Fe Conservation Alternative to develop a much more nuanced restoration project, focused primarily on real restoration such as decommissioning unneeded roads, planting in riparian ways and erosion control. A robust monitoring program is of the essence.

II. Additional Concerns:

- 1) Monitoring — There must be a robust monitoring program developed and put into in place. It should thoroughly consider effects of fuel treatments on overall forest ecology, connectivity, riparian ways, wildlife (especially endangered and at-risk species), tree health, affects on recreation and the health impacts of prescribed burn smoke on humans and wildlife. Mexican spotted owl populations must be monitored. It is necessary for a requirement to be put into place that the project be halted if the monitoring plan is not thoroughly and comprehensively carried out.
- 2) Assumptions — Many assumptions are based on unproven science or studies that have substantial flaws and invalid conclusions. Assumptions should be thoroughly evaluated using a broad range of research including studies that support a more conservationist view of forest management. The explanation in the Scoping Document of why there is an increased and substantial fire risk is very limited to one scientific perspective (connectivity of fuels), when as delineated in the Common Ground report, there are three important scientific perspectives regarding the condition of our forests. Climate needs to be considered much more in the analysis of this project, both as a causative factor for fire and that there is a need to preserve trees to sequester carbon.
- 3) Conservation — There should be a general strong bias in project planning towards conserving our forest in as natural a condition as possible, and to allow forest ecology itself to bring our forest into greater balance through natural processes. There are too many substantial adverse impacts related to intensive tree thinning and prescribed burning. Treatments should be very limited, site-specific and strategic, as recommended by the Santa Fe Conservation Alternative.
- 4) Genuine restoration — Focus should be on genuine restoration activities instead of cutting and burning. Decommissioning of all unneeded roads must be included in project planning. Focus should be on true restoration such as planting in riparian areas as needed and hand-building structures in arroyos to slow flood waters.
- 5) Reduce prescribed burns for public health — The Proposed Action contains up to 110,213 acres of prescribed burning. That much burning will have very large negative impacts on public health. There is a great deal of upset and controversy among the public about the adverse health effects many are experiencing from the large number of prescribed burns and wildfires expanded with fire accelerants in recent years. The number of days per year that the USFS performs prescribed burns must be capped, so that there is a very limited number of days that create smoke impacts on the public. The effects of volatilized fire accelerants must be analyzed. A system

must be set up to take in and document public health impact reports.

6) Roads — There are 6,900 miles of roads in the SFNF, many of which are leaking sediment into streams and fragmenting wildlife habitat. According to the 2008 Travel Management Record of Decision for the Santa Fe National Forest, 2,878 miles of open system roads were to be closed for public use. A minimum network of roads should be identified for the Encino Vista Landscape Restoration Project area, and all unneeded roads should be closed and/or decommissioned.

7) Invasive species — The Proposed Action does not include sufficient actions for limiting the spread of invasive species via management of livestock grazing, roads, equipment used for thinning and OHVs. A thorough plan must be developed.

8) Thinning — The framework provided by GTR-310 clearly supports over-thinning in the SFNF. Projects done in the SFNF post GTR-310 are not much healthier in appearance than pre-GTR-310. The cost/benefit analysis of thinning, especially the severe thinning recommended by GTR-310, a document not focused on our forest type, has not been done. Any thinning done should be very light-handed, targeted and limited to protect specific discreet values or for extremely dense areas previously damaged by logging.

9) Prescribed burns — There may be some justification for limited prescribed burns where the duff and understory are very thick, but the widespread prescribed burning that is repeated every several years has clearly not supported forest health. The forest understory is never allowed to return, or as soon as it has started to return it is burned off again. The use of prescribed burns needs to be re-evaluated using the full range of the best available science.

10) Connectivity — Connectivity is inadequately addressed in the Proposed Action, having an emphasis on vegetation management in Ecological Response Units. Connectivity should be a major focus and strong and effective wildlife corridors developed.

11) IRAs — No mechanical thinning should occur in Inventoried Roadless Areas, and very little prescribed burning — only when there is a limited, strategic and site-specific reason. IRAs should be left as intact as possible.

12) WUI communities — Thinning should not be done further than 150 feet from structures in WUI areas for the prevention of fire in WUI communities as it has been proven to not be an effective strategy for this purpose by former USFS researcher Jack Cohen and others. Forests adjacent to communities should be left intact and natural as possible to be used for recreation. Support and education should be given to WUI property owners to effectively fire proof their homes and the surrounding 150 feet. The development of alternative egresses for communities that have only one egress should be supported.

III. The Santa Fe Conservation Alternative

The Proposed Action does not adequately meet the conservation requirement of the 2012 forest planning rule. "Conservation. The protection, preservation, management, or restoration of natural environments, ecological communities and species." Alternative 2 includes forest fuel treatments and road development that clearly, in the SFNF, greatly harm the forest ecosystem in numerous ways.

WildEarth Guardians, along with Sierra Club and Defenders of Wildlife have developed an alternative for analysis in both an EA and/or an EIS for the Santa Fe Mountains Landscape Resiliency Project called the Santa Fe Conservation Alternative, to address forest management in a way that conserves forest resources. It is equally applicable to the Encino Vista Landscape Restoration Project and would meet the conservation

requirement of the 2012 forest planning rule very well. These principles should be applied to the Encino Vista Landscape Restoration Project

It is based on education, engineering and enforcement. Instead of widespread fuel treatments out in the forest away from the WUI, it recommends the more effective and conservationist steps of educating the public about maintaining a safety zone around WUI structures and campfire safety, engineering to protect communities and values from post-fire flooding in key areas, maintaining power lines, etc. and increased law enforcement to reduce unsafe fire behavior in the forest.

I am submitting it as the preferred general approach for the Encino Vista Landscape Restoration Project.

The basic principles of the Santa Fe Conservation Alternative are:

Thinning

- Limited hand thinning (up to 9") only in dry pine and mixed conifer outside of IRAs.
- Stumps cut down to the ground
- No thinning adjacent to the WUI for the purpose of protection of structures or communities except within 150 feet of structures, and for fire fighter safety zones.
- Maximum trees removed in most thinned areas to 80 BA
- Leave more tree groupings (50% minimum) and maintain a shrub understory. Utilize a wildlife habitat-based determination of tree and vegetation retention
- Identify riparian area concerns and create plan to protect

Slash management

- Pile burning of activity fuels
- Reevaluate slash management timing and methods to avoid potential bark beetle outbreaks, and sterilization of soil under slash piles. No slash over 3" left on the ground during the dry season

Prescribed burning

- Utilize managed wildland fire and pile burning wherever possible. Utilize minimal broadcast prescribed burns only in areas that are not assessable for pile burns.

IRAs

- No thinning in IRAs
- Identify Roadless Area concerns and develop a policy to restore

Monitoring (key means of reaching desired outcomes of healthy forest habitat and protection of public health)

- Test plots for monitoring purposes
- Soil sampling - plot number and spacing to be determined
- Baseline species evaluation (i.e. population capacity and presence/absence)
- Improved air quality standards and monitoring to protect sensitive (human) population

Reclamation and restoration

- Reclamation of any USFS roads deemed unessential in Travel Management Plan
- Hand building of structures (example Zuni bowls) in arroyos to slow flood waters
- Planting native, stream side vegetation where appropriate to slow floodwaters
- Reintroduction of beaver where appropriate

WUI and community forests

- Develop a program to support fire-proofing of structures and surrounding 100 feet, at least

through increased outreach and education. This should be a homeowner responsibility
—If possible, support development of an alternative egress for communities with a single egress
—Leave most areas that the public uses for recreation, including forests adjacent to communities, natural and intact.
--Take into greater account the need to preserve areas that are special to communities, such as Cougar Canyon
—Increased law enforcement to protect against unsafe fire behavior by forest visitors

Scenic quality

—Maintain the scenic quality of all treated areas. Develop a standard for acceptable scenic quality

Sincerely,

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