



April 10, 2017

Mr. Thomas L. Tidwell, Chief
USDA Forest Service
National Office
1400 Independence Ave., SW
Washington, D.C. 20250-0003
ttidwell@fs.fed.us

re: Hyde Park Wildlands Urban Interface Project and related Projects, Santa Fe National Forest

Dear Mr. Tidwell,

The Santa Fe Forest Coalition (SFFC) herein provides information concerning the Chief's roadless area review of the Hyde Park Wildland Urban Interface project (Hyde Park project) and related projects on the Española and Pecos/Las Vegas Ranger Districts of the Santa Fe National Forest. The Hyde Park project is entirely within an inventoried roadless area (IRA).

In 2016 the Santa Fe National Forest joined with several New Mexico agencies and private groups to design the 107,000 acre Greater Santa Fe Fireshed with the intent of clearing millions of trees through mechanical treatments and prescribed burns ostensibly to restore historic fire conditions. SFFC is concerned that the cumulative impacts of the Hyde Park project together with several others in the Fireshed (La Cueva, Pacheco Canyon, Gabaldon, Thompson Peak and the Santa Fe Municipal Watershed) have not been addressed. These related projects would affect additional IRAs in whole or part totaling approximately half the Fireshed's acreage.

1. Inventoried Roadless Area Review

In a May 31, 2012 letter to Regional Foresters you required review of all projects proposed in IRAs under the 2001 Roadless Rule to ensure “. . . that we are doing all we can to protect roadless area characteristics. Roadless areas provide opportunities for restoration of ecosystem function and improvement of threatened, endangered, proposed, and sensitive species habitat. Integration of roadless area management into your landscape restoration plans is an important component of overall environmental restoration.” The Hyde Park project and related projects requires your review because they propose “the cutting, sale, or removal of generally small diameter timber . . . to maintain or restore the characteristics of ecosystem composition and structure, such as to reduce the risk of uncharacteristic wildfire effects within the range of variability that would be expected to occur under natural disturbance regimes of the current climatic period.” (see Chief’s Review Process for Activities in Roadless Areas).

We suggest conducting your roadless area review in the Fireshed as a whole with particular reference to the historic range of variability (HRV) of fire (e.g. size and intervals) and vegetative structure (e.g. tree density). HRV refers to “the ecological conditions, and the spatial and temporal variations in these conditions, that are relatively unaffected by people, within a period of time and geographic area.” (Landres, Morgan and Swanson,1999). The requirement under the National Forest Management Act to “provide for diversity of plant and animal communities . . .” 16 U.S.C. § 1604(g)(3)(B) will likely be met if ecosystems under Forest Service management function within their HRV.

Restoration ecology uses HRV to set achievable goals (Shinneman, Baker and Lyon, 2008). Under HRV fires in the ponderosa pine—Douglas fir landscapes such as found in the project area typically burned in a mixture of low and high severity. Low intensity fires as well as infrequent large fires burning under severe weather conditions are characteristic of the project area. While fires may have declined since EuroAmerican settlement, there is little evidence that fuels in ponderosa pine—Douglas fir forests have built up to abnormal levels, that tree density is abnormally high or fires are more severe (Baker 2009, 266).

Therefore, it is unlikely that proposed mechanical treatments and prescribed burning will restore ecosystem functions. Instead fuel reduction has potentially adverse effects on native plants and animals, soils and watersheds and poses the risk of an irreversible increase in invasive species. If needed, fuel reduction should focus on limited areas near our homes and other high value features (Baker 2009, 432).

2. Limited public involvement and post-hoc decision making

Unfortunately, the planning process to date has not been transparent and “non-exclusive” as required by Healthy Forest Restoration Act (HFRA) P.L. 108-148. A collaborative process was *not* utilized that involves multiple interested persons that live within and adjacent to the Fireshed planning area. Therefore, we request that you instruct local officials to meet their obligations under HFRA by encouraging and involving local residents to the fullest extent possible in project planning. 40 C.F.R. § 1500.2(d).

We are also concerned that the Forest Service has engaged in post-hoc decision making. Before scoping for this project was even initiated, it was determined that it will be categorically excluded “. . . from documentation in an environmental impact statement or an environmental assessment under Section 603 of the Healthy Forest Restoration Act (16 U.S.C. 6591b).” (Scoping Information, Hyde Park WUI Project, February 2017). This is clearly contrary to the National Environmental Policy Act (NEPA) which requires that the categorical exclusion determination take place *after* scoping and determining whether the proposed actions have individually or cumulatively significant impacts.

A key question under NEPA is whether this proposed project will ‘significantly affect’ the environment, thereby triggering the requirement to prepare an Environmental Impact Statement (EIS). This requires that the Forest Service adequately consider the unique characteristics of the affected geographic areas, the degree to which effects on the quality of the environment are controversial or the risks were unknown, the degree to which categorical exclusions might establish a precedent for future actions with significant effects or represented a decision in principle about future considerations, the degree to which the actions might affect endangered or sensitive species, and whether there exists cumulative impacts from the other related actions proposed for the Fireshed. 40 C.F.R. § 1508.27(b).

Of particular concern to local residents are the adverse cumulative impacts of mechanical treatments and prescribed burning in the larger Fireshed ecosystem. A cumulative effects analysis cannot focus only on the beneficial effects of hazardous fuels management while ignoring the effects on the environment as a whole. A quantitative analysis based on credible methodology must be presented; the Forest Service cannot argue that there will be no significant cumulative impacts based exclusively on the exercise of its expertise.

For example, empirical data must be presented to assess the effects on air quality from prescribed burning, the effects on soil and water quality from mechanical treatments including localized sterilization of soil and sedimentation of water quality,

displacement of wildlife from noise and activity caused by mechanized equipment and habitat modification (changes in food sources, thermal and hiding cover), from changes in vegetation composition, invasive weed species and reduced vegetation density.

We are also concerned that categorical exclusions do not require any mitigation measures to lessen adverse impacts; mitigation supported by analytic data is an essential element of an EIS.

In conclusion, we respectfully request that all ground disturbing activities in the Santa Fe National Forest within the Greater Santa Fe Fireshed not proceed until the environmental consequences are fully disclosed and evaluated in a comprehensive EIS that engages the public to the maximum extent possible.

Respectfully submitted,

Carol Johnson, for the
Santa Fe Forest Coalition
(505)757-2988
info@lacuevaguards.org

Lyra Barron
La Cueva Guardians
info@lacuevaguards.org

cc: Mr. Cal Joyner, Regional Forester, Southwestern Region
Mr. James Melanos, Supervisor, Santa Fe National Forest
Mr. Sandy Hurlocker, Española District Ranger, SFNF
Mr. Steve Romero, Pecos/Las Vegas District Ranger, SFNF
Congressman Ben Ray Lujan
Senator Tom Udall
Senator Martin Heinrich
Santa Fe Mayor Javier Gonzales

References

Baker, W.L. 2009. *Fire Ecology in Rocky Mountain Landscapes*. Island Press, Wash. D.C. 605 p.

Landres, P.B., P. Morgan, and F.J. Swanson. 1999. Overview of the use of natural variability concepts in managing ecological systems. *Ecological Applications* 9:1179-88.

Shinneman, D.J., W.L. Baker, and P. Lyon. 2008. Ecological restoration needs derived from reference conditions for a semi-arid landscape in western Colorado, USA. *Journal of Arid Environments* 72:207-27.