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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO
ALBUQUERQUE DIVISION**

WILD WATERSHED, MULTIPLE CHEM-
ICAL SENSITIVITIES TASK FORCE, Dr.
ANN MCCAMPBELL, M.D., and JAN
BOYER,
Plaintiffs,
vs.

SANFORD HURLOCKER, District
Ranger, Santa Fe National Forest, JAMES
MELONAS, Supervisor, Santa Fe National
Forest, CAL JOYNER, Southwest Regional
Forester, U.S. Forest Service, and VICTO-
RIA CHRISTIANSEN, Chief of the U.S.
Forest Service, an agency of the U.S. Dept.
of Agriculture,
Defendants.

6:18-cv-00486

DECLARATION OF SAM HITT

I, Sam Hitt, pursuant to 28 U.S.C. §1746, declare under penalty of perjury that the following is true and correct and if called to testify I would attest to the following:

1. I am over eighteen years old, have personal knowledge of the facts stated herein, and would provide the same information in person, if called to testify as a witness in this case.
2. I have hiked, bird watched and enjoyed the portions of the Santa Fe National Forest subject to this litigation since 1970. While doing so I have documented breeding bird species and taken photographs of the scenic beauty in the project areas subject to this litigation.
3. I filed timely comments as requested for these projects in 2005, 2006, 2009 and 2017 on behalf of Wild Watershed, concerned citizens and public interest organizations.
4. I submitted a detailed citizens alternative in 2009 when the Santa Fe National Forest solicited comments for an Environmental Assessment that was then being prepared for the Hyde Park project.
5. I prepared a detailed citizen alternative for the Santa Fe Municipal Watershed Project in 2001 and the Gallinas Municipal Watershed Wildland-Urban Interface Project in 2005. These alternatives maintain forest cover while reducing fire risk, resulting in less flammable debris and protecting soils on steep slopes.
6. I was a founding member of the IPM (Integrated Pest Management) Working Group in the mid-1980s that formed to resolve controversies over the use of chemical insecticides in Southwestern national forests. The Santa Fe National Forest Plan incorporates IPM Working Group recommendations that emphasize the evolutionary role insects and disease play in forest ecosystems.

7. I founded and directed Forest Guardians (now WildEarth Guardians) in 1989. Forest Guardians successfully advocated for greater awareness and protection of old growth forests in the eleven national forests in Arizona and New Mexico. See <https://rmoa.unm.edu/docviewer.php?docId=nmumss994bc.xml> for an archive of documents pertaining to my involvement with Forest Guardians from 1988 to 2011.
8. I conducted bird surveys in the Hyde Park project area in 2006, 2017 and 2018 with experienced birding guide Bill West. In addition, Mr. West has surveyed birds in the Aztec Springs area close to the Hyde Park project area in the spring of 2015 and 2016. A total of 69 species of breeding birds were documented in these surveys. Of these 13 are cavity nesting species that require large diameter nesting trees to raise their young.
9. The population trend of cavity nesting birds on the Santa Fe National Forest is unknown despite the requirement in the Santa Fe National Forest Plan to monitor their populations in cooperation with the New Mexico Department of Game and Fish.
10. The Hairy Woodpecker is designated as an indicator species for dozens of other cavity nesters in the Santa Fe National Forest Plan. The population health of cavity nesting species is known only by regularly monitoring Hairy Woodpecker populations. To the best of my knowledge, Hairy Woodpecker populations have not in the past nor are they currently being monitored on the Santa Fe National Forest.
11. On the morning of May 31, 2018, I observed both female and male Hairy Woodpeckers in the Hyde Park project area entering a nest cavity in a standing dead aspen with food. According to my reading of the project record, this nesting tree and surrounding habitat will be destroyed when the area is clearcut as part of the Hyde Park project.

12. Nesting trees are not adequately protected in the treatments approved by the Hyde Park, Pacheco Canyon projects or in the adjacent Santa Fe Municipal Watershed Project. The photo to the right shows a large ponderosa pine nesting tree cut in the watershed on a ridge approximately one hundred yards north of the Hyde Park Project. (= >)



13. Many people, including myself and the members of Wild Watershed, value the beauty of untrammed roadless forests shaped by evolutionary processes that provide habitat for diverse species of wildlife. The “before” photos (below) illustrate accurately how such forests in Hyde Park and Pacheco Canyon appear now:



14. For comparison, the following “after” photo shows a heavily “treated” roadless forest where more than 90 percent of the trees have been cut and burned in the adjacent Santa Fe Municipi-

pal Watershed Project, which is similar to the approved treatments challenged in this litigation >>

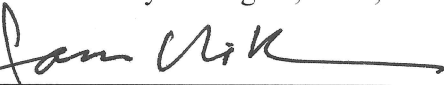
15. My own and Wild Watershed members' interests will be irreparably harmed by the challenged treatments, which will substantially alter the natural appearance and function of the largely roadless areas we have protected successfully for so long, and preventing these projects from proceeding as approved will avoid that irreparable harm.



16. In addition, we have been engaged with the Forest Service for over a decade on the controversial decisions to drastically alter these landscapes, consistently demanding the kind of careful study and analysis that can only be accomplished with preparation of an Environmental Impact Statement, and our interests in the management of the Santa Fe National Forests and its roadless areas according to sound scientific and public policy will be irreparably harmed if these (and anticipated future) projects proceed without such careful study. Our interests in the management of our public forests will be protected by a court order to the Forest Service to prepare a programmatic EIS for the ongoing watershed/fireshed treatment projects.
17. The Santa Fe National Forest Plan requires the preparation of Viewshed Corridor Plans as part of project level planning to ensure that the high visual quality of the Hyde Park and Pacheco Canyon projects are maintained. To the best of my knowledge, Viewshed Corridor Plans were not prepared for either project.

I swear that the foregoing is accurate and true to the best of my knowledge.

Dated this 27th day of August, 2018,



Sam Hitt