



Northern New Mexico Group
Rio Grande Chapter
1807 Second Street, Suite 45, Santa Fe, NM 87505

March 31, 2017

Mr. Sandford Hurlocker, District Ranger
Santa Fe National Forest
Espanola Ranger District
P.O. Box 3307, Fairview Station
1710 N. Riverside Drive
Espanola, N.M. 87533

Via Email: shurlocker@fs.fed.us

RE: Comments on Hyde Park WUI Project

Dear Mr. Hurlocker,

Responding to member concerns regarding *wildlife impacts* from the proposed Hyde Park Wildland Urban Interface Project, the Northern New Mexico Group of the Rio Grande Chapter of Sierra Club submits the following comments in accordance with the agency's obligations under the National Environmental Policy Act (NEPA) regulations at 40 C.F.R. § 1501.7.

Based upon numerous observations and documentation of bird species in the Hyde Park area, the 1,825 acres proposed for thinning and prescribed burns *currently* provide *excellent bird habitat* for breeding and wintering for over 22 documented bird species, some protected under the Migratory Bird Treaty Act (MBTA).

1. The Project's written objectives indicate the majority of all trees smaller than 16" in diameter will be thinned as well as 10-30% of the mature "over-story" trees. Given that the current tree cover is as high as 1,200 trees per acre with the majority being trees smaller than 16" in diameter, such a wholesale removal of trees and understory could seriously impact the ability of these species to return to this area for many years.

Experienced birders and professional birding tour guides have recorded rare species, like the Flammulated Owl, in the Hyde Park project area; migratory flycatchers, warblers and vireos protected under the MBTA; and the Northern Goshawk, a listed sensitive species by USFS. Goshawks require a minimum of 40% average canopy cover in mature forests, with more canopy required by their primary prey, Abert's squirrel and other rodents for winter-feeding. The songbird species require a forest habitat with understory diverse

enough to produce the required seeds, insects, pods and cavities to provide suitable nesting and feeding sources to sustain them.

2. Thinning rate excessive for area topography and future climate conditions

“The project area is approximately 1,825 acres. Within this area, the proposed project would thin (usually with hand-held equipment such as chain saws) and prescribe burn approximately 1,000 acres to reduce the risk of crown fire. Mechanical thinning would occur on up to 826 acres with on-site mastication of thinned trees, followed by prescribed fire. ... The proposed project would create openings where aspen grows now, or where evidence indicates aspen had grown but has been suppressed by conifer encroachment. These openings would be no larger than five acres per opening. This would enhance the structural diversity of the area, improving habitat diversity as well. For example, openings offer habitat for songbirds and young aspen shoots for wildlife.”

While this objective seems beneficial, the effects of increased drought, higher temperatures and intense windstorms in the Santa Fe area make the re-vegetation of “openings” problematic and more prone to invasive weed encroachment that will reduce bird and other wildlife habitat.

A less drastic thinning rate that leaves 200-300 trees per acre (Johnson, et al, 2011) is effective in creating “fire-safe” forests while preventing significant soil erosion, ground moisture and nutrient loss needed for regeneration.

3. Loss of wildlife reference sites making monitoring of project results unfeasible

The project will destroy a 400-acre monitoring site, one of two remaining wildlife reference sites established to document impacts from extensive tree clearing within the adjacent Santa Fe Municipal. The other site is located in Gabaldon, also scheduled for similar treatment.

The Record of Decision for the Santa Fe Municipal Watershed Project required that terrestrial and associated wildlife be monitored, including species in the undisturbed reference site (USDA Forest Service. 2001:7).

Reference sites provide feedback to project managers on the success and impacts of their projects on other parts of the ecosystem. They give all stakeholders, including local residents, a comparison of all the outcomes on a treated area versus the ongoing ecosystem health and diversity of an untreated area.

Loss of the Hyde Park monitoring site will make it almost impossible to make any meaningful comparisons, or reach any informed conclusions about the Project’s benefits or negative impacts on the habitat, wildlife or larger system functions. Without a reference point, there is no basis for comparison and analysis of what the altered forest landscape tells you.

4. Insufficient detail in the Scoping Information on the rationale for high thinning rate and large number of acres in prescribed burn as being most beneficial alternative

Section 603 of the Healthy Forests Restoration Act established a categorical exclusion for qualifying insect and disease projects as designated areas of National Forest Service lands.

While that provision makes it likely that this Project can proceed without an Environmental Impact Study, it does not protect the forest or the city of Santa Fe from the risk of significantly negative outcomes.

The team working on this project has the technical ability and expertise to provide far more safeguards and information to residents and concerned visitors who highly value Hyde Park for what it provides to all people and wildlife in this area.

We would recommend:

1. Preserve the existing 400-acre wildlife reference site (see Peter Stacey PhD, UNM)
2. Compare the pros and cons of a lighter thinning rate (keep 300 trees vs. <80 trees per acre) and compare percentage of soil loss, moisture loss, and cooling shade, along with increased surface wind and flame length in cleared areas, so the public can see what the benefits and risks of either plan will be
3. *Have a written plan to protect existing wildlife populations before the project design is completed*

It is not enough to say this has to be done and here is one way to do it, when many factors of climate change, baseline monitoring, wildlife protection and public opposition have not been adequately addressed. We all want healthy forests.

Respectfully,



Teresa Seamster
Chair

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