



April 12, 2017

Sanford Hurlocker  
District Ranger  
Española Ranger District  
Santa Fe National Forest  
1710 North Riverside Drive  
Española, NM 87532

Re: Hyde Park Wildland Urban Interface Project and Pacheco Canyon Forest Resiliency Project

Dear Mr. Hurlocker:

On behalf of The Wilderness Society, I am writing to comment on the scoping notices for the above-referenced Hyde Park and Pacheco Canyon projects. The Wilderness Society is a national non-profit organization dedicated to protecting wilderness and inspiring people to care for wild places. The Society has been monitoring discussions of issues and potential management activities as an observer in the Santa Fe Fireshed Coalition. We support the Coalition's goal to create more resilient landscapes and fire-adapted communities, and we appreciate the Forest Service's collaborative participation in the Coalition.

Based on our review of the three-page scoping documents for each of the two proposed projects, we wish to bring several issues and concerns to your attention. First and foremost, we question whether it is appropriate to use a categorical exclusion (CE) for either of these projects. The CE authority for thinning projects under Section 603 of the Healthy Forest Restoration Act (HFRA) is limited to projects that are designed to "reduce the risk or extent of, or increase the resilience to, insect or disease infestation." However, that is not the stated purpose of either of these projects. According to the scoping documents, the purpose of the Hyde Park project is to "reduce the risk of catastrophic crown fire within the project area," and the purpose of the Pacheco Canyon project is to "change forest conditions so that a fire starting in the project area would, under most fire weather conditions, remain low-intensity...." These project purposes are not the same as reducing insect or disease infestation; indeed, neither of the scoping documents mentions insect or disease problems. Furthermore, the fact that the Hyde Park project was originally proposed in 2005 -- prior to the formation and involvement of the Santa Fe Fireshed Coalition -- raises a question of whether the project has been "developed ... through a collaborative process" as required by Section 603 of the HFRA.

Another concern we have regarding the potential use of CEs is that it is not clear to us, based on the scoping documents, that the two projects can be assumed to have no significant environmental effects or public controversy. The scoping document for the Hyde Park project states that the original project was appealed and remanded for further analysis in 2006, but it does not say why further analysis was needed, how it was performed, and what it found. Has the original project been modified to address the public controversy that prompted the 2006 appeal and remand?

A second issue/concern that we have with the scoping documents for both proposals is the lack of any mention of monitoring. We are particularly concerned about the potential impact of the Hyde Park project on the existing reference sites that were established in the Santa Fe Watershed project to monitor wildlife. We would like to know how the Forest Service intends to monitor the effects of both projects, and what impacts the Hyde Park treatments would have on existing wildlife monitoring reference sites.

Finally, we would like to better understand the Forest Service's rationale for invoking an exception to the Roadless Area Conservation Rule's general prohibition on logging. As a staunch supporter of roadless area conservation, The Wilderness Society is very interested in how the two projects will affect the Inventoried Roadless Areas in the project areas. We are glad to know that no road construction or reconstruction would occur as part of either project. However, we would like to know how existing roads within the IRAs would be used, and whether those roads would be decommissioned following the treatments. We are also interested in seeing the documentation that you are providing for the Regional Forester's review of the proposed logging activities, as well as the Regional Forester's response. The fact that both projects would involve substantial amounts of logging in Inventoried Roadless Areas strongly reinforces our view that it would not be appropriate to categorically exclude these projects from environmental analysis and additional public involvement.

Thank you for consideration of The Wilderness Society's comments. We look forward to working with you on these and other management activities in the Santa Fe National Forest.

Sincerely,

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