



April 11, 2024

Coyote Ranger District
HC 78 Box 1
Coyote, New Mexico 87012

Re: Encino Vista Landscape Restoration Project Preliminary Environmental Assessment

Dear Ranger Sando,

The Forest Stewards Guild is a national organization of foresters and allied natural resource professionals dedicated to practicing and promoting responsible forestry as a means of sustaining the integrity of forest ecosystems and the people who depend on them. Our organization was founded in northern New Mexico, and we continue to use innovative, science-based solutions to meet the challenges of forest conservation and management in this landscape. Following review of the Encino Vista Landscape Restoration Project (EVLRP) Preliminary Environmental Assessment and discussions with US Forest Service staff at the Coronado Highschool open house on March 20, 2024, **we are writing in support of the Proposed Action Alternative (Alternative B) for the EVLRP.**

The detrimental direct, indirect, and cumulative effects of the No Action Alternative (Alternative A) are severe, would stray from direction outlined in the 2022 Santa Fe National Forest Land Management Plan, and, if no action is taken, would have a significant long-term impact. Given the documented impacts of the No Action Alternative, including homogenous even-aged stands (and decreased drought resilience), severe wildfire (and uncontrolled smoke impacts), increased insect and disease outbreaks, continued sedimentation in waterways, and no new opportunities for community fuelwood harvest, doing nothing is unacceptable. Moreover, EVLRP is part of the Rio Chama Collaborative Landscape Restoration project and Alternative B will further the goals for wider ecological and community resilience. Finally, it was encouraging to see the environmental justice, climate change, and greenhouse gas emission analyses as these are really critical to understanding the broader impacts and tradeoffs.

Overall, the Proposed Action Alternative (Alternative B) is comprehensive, and would be strengthened by considering the following:

1. Inclusion of literature and data guiding old-growth project planning:
 - o Section 1.3.3, page 16, incorporates old-growth direction from the 2022 SFNF LMP and Executive Order 14072, and acknowledges forthcoming direction from December 19, 2023 USDA Notice of Intent in the Federal Register to prepare an Environmental Impact Statement to amend all “national forest land management plans to include consistent direction to manage, conserve and steward old-growth forest conditions”. In addition, Section 3.2, page 46, states “Midscale GIS data was used to allocate old growth in each of the forest types found in table 11”. The draft EA would benefit from a description of the findings of the midscale GIS analysis and

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how the findings relate to the proposed treatments, as well as a better description of how proposed actions would promote old-growth characteristics. More detail on how the Forest Service will identify and map areas of old-growth forest will improve the EA. Project level data on old-growth stands, or potential old-growth, should be combined with on-the-ground assessment to ensure EVLRP actions promote old-growth forest characteristics.

- Section 2.3.1, page 34, notes that "All trees greater than 24" in DBH would be retained regardless of health or condition". We support the retention of old and large trees and have long used the New Mexico Restoration Principles as a foundation. We encourage the Forest Service to increase the specificity of the retention goals. This cap could be refined by focusing on ERU or species, rather than a blanket project-wide cap, and retention of trees with old-growth morphology should be incorporated. Greater detail on retention is important both for ecological resilience as well as community support.
2. Minimize road expansion and road-side mastication to the extent possible:
 - The draft EA notes that the "project area watersheds have some of the highest road densities on the forest" (Section 1.3.6, Page 21), yet Table 9, Page 39 indicates that 14 miles of administrative roads will be updated and 8 miles of temporary roads will be created. The section would benefit from a clearer justification of why these roads would be opened or temporarily created, and what are the objectives and benefits of these actions.
 - The draft EA notes that the "project area watersheds have some of the highest road densities on the forest" (Section 1.3.6, Page 21), and that mastication "will solely focus on unit perimeter prep buffering up to 150 feet along FS roads" (Section 2.3.1, Page 36). The map in Appendix E (Figure 3) however indicates that all roads may receive mastication treatment. The section would be improved by increased alignment between Figure 3 and Section 2.3.1, Page 36. While we understand the benefit of mastication and a roadside buffer for improving safe prescribed and managed fire operations, given the cost, a strategic mastication approach could be considered. Prioritize mastication along roads that are essential for safe ingress/egress and/or fire containment (as determined by fire models, Potential Operational Delineations, or local knowledge from fire managers). As it is currently written, the draft EA would benefit from increased clarity and justification for treating along every road in the project area.
 3. Commit to providing community fuelwood:
 - Section 2.3.1, page 36, notes that forest products "may be sold through personal use and commercial wood product contracts". Every effort should be made to support community-centered fuelwood harvest and use. Existing programs such as the National Forest Foundation's Wood for Life and/or the Leñero programs such as those on the East Zone of the Carson National Forest could be built into EVLRP plans to ensure fuelwood stays local and is accessible for community members.
 4. Commit to project monitoring and Adaptive Management:
 - "Adaptive Management" is minimally mentioned in the draft EA (Page 93, 96, and in the Glossary on Page 174). Given the complex interactions that are expected within the EVLRP footprint (as noted in the draft EA: Vegetation Resources; Fire and Fuels; Roads; Air Quality; Climate Change; Cultural Resources; Wildlife, Fish, and Rare Plants; Range Resources; Recreation and Scenery; Watershed and Soils; Inventoried Roadless Areas; and Socioeconomic and Environmental Justice) and the intended project timeline of 10-15 years, there is ample time to monitor and incorporate findings to improve outcomes. Alternative B would benefit from a discussion of plans to implement project monitoring and outline Adaptive Management check-ins and opportunities.

In summary, we encourage you to move forward with the Proposed Action Alternative (Alternative B) for the EVLRP. The combination of road improvements to reduce sedimentation, multi-tiered approach to conduct large-scale broadcast burns, and the opportunity for increased community fuelwood harvest support a more resilient forest ecosystem and human community than does the No Action Alternative (Alternative A).

Sincerely,

Cody Dems, Rio Chama Manager

Eytan Krasilovsky, Deputy Director