



April 11, 2024

**RE: Comments on the Preliminary Environmental Assessment for the Encino Vista Landscape Restoration Project**

To Whom it May Concern,

Please accept the following comments from Trout Unlimited (TU) regarding the proposed Encino Vista Forest Landscape Restoration Preliminary Environmental Assessment (EA). We understand the purpose of this project is to improve forest and watershed health in the treatment area through a combination of non-commercial forest treatments, prescribed fire, and road improvement and decommissioning. We agree with you that this work is necessary to improve ecosystem health and resiliency on the Coyote and Cuba Ranger Districts of the Santa Fe National Forest.

**Project Purpose and Need**

We agree with the purpose and need for this project, specifically that there is a need to restore forest health through management actions that create safe conditions for the reintroduction of fire, improve and maintain diverse wildlife habitats, and enhance watershed function. The management actions proposed in the Encino Vista Draft EA can improve watershed function, reduce the risk of catastrophic wildfire, and benefit fish and wildlife species.

By improving forest health and the quality of watershed habitat, native species will benefit, including at-risk species. As noted in the Santa Fe National Forest Land Management Plan (LMP), there is a need for restoration and maintenance of ecological conditions that contribute to the recovery and conservation of federally listed species (threatened and endangered) and maintain viable populations of the species of conservation concern. Riparian areas play a critical role in the life cycles of many species found on the SFNF, including both aquatic and terrestrial species, and we urge you to make riparian area enhancement a component of this project where those opportunities exist. As noted in the LMP, riparian areas occupy less than 3 percent of the Santa Fe National Forest but provide some of the most important and biodiverse habitats and are critical for providing ecosystem services to downstream communities.

Trout Unlimited appreciates your efforts to responsibly analyze, plan, and implement the restoration of frequent fire adapted ecosystems. Restoration that is anchored in science and reintroduces low to moderate intensity fire is severely needed in this landscape to avoid the potentially devastating effects on forests, wildlife, fish, and water resources. We believe this preliminary environmental assessment adequately assesses the proposed actions and alternatives, and we view the assessment as a necessary step in building public trust in this project.

### **Riparian Areas, Stream Function, and Native Species**

Upon reviewing the EA, Trout Unlimited has several suggestions for forest managers to consider to better improve habitat and watershed resiliency to the benefit of native species in the Encino Vista Forest Restoration Project:

1. When prioritizing restoration projects, assess ancillary opportunities to improve riparian habitat and stream function, habitat for at-risk species, and partner interest.
2. Assess opportunities to benefit trout and native species through forest and riparian area restoration, including potential expansion or improvement of habitat for Rio Grande cutthroat trout (RGCT) in Canones Creek, Coyote Creek, Poleo Creek, Chihuahueros Creek, Corralitos Creek, and other waterways.
3. Identify opportunities to address the impacts of chronic headcutting and channel incisions.
4. Identifying opportunities to increase the quantity and duration of stream flows by dual purposing forest restoration actions towards attenuating surface runoff (e.g. contour felling, cross drainage placement of felled trees).
5. Prioritize naturalization and obliteration as alternatives to road decommissioning, especially in riparian management zones and where long-term sedimentation concerns exist.

### **Specific Restoration Actions**

Due to the presence of permitted grazing and the need to address forest encroachment and the paucity of aspen stands, we suggest that following measures when addressing shrinking meadows, particularly those where riparian areas are present:

1. Consider meeting with relevant grazing permittees when implementing forest treatments that may impact or enhance local range conditions.
2. As ecologically appropriate, expand meadows to the effect of disbursing grazing impact.
3. When feasible, consider felling and leaving medium to large trees along contour lines or across sloping meadows to attenuate sheet flow, with a preference for spruce trees (where possible), whose branching pattern is a disincentive to fuelwood collectors preferring ponderosa pine. Such actions could have several benefits: thick branching inhibits cattle access to grass, thereby creating a seed bank; reduced cattle access reduces local hoof shear and compaction; large woody debris provides habitat for rodents, possibly bolstering the food base for MSO and goshawks; downed trees may act as drift fences, encouraging cattle to walk meandering instead of straight paths; downed trees act as water and wind breaks, increasing water infiltration and maintaining soil moisture.
4. Consider felling smaller trees and leaving them in nascent erosion gullies, with a preference for spruce or fir trees to discourage fuelwood collection.
5. In pinon/juniper woodlands and sage areas, consider implementing the lop and scatter technique, especially on bare ground, which may be exposed to chronic wind and water erosion. This technique has been shown to be conducive to the reestablishment of native grasses like blue gramma and side oats gramma.

Generally, Trout Unlimited is particularly interested in riparian areas that will be targeted for restoration under this proposal. In some locations, conifer encroachment into riparian areas presents a heightened fire risk and treatments could help restore native riparian vegetation such as aspens, willows and alders, but management activities in riparian areas should be done with the additional purposes of improving the quality of riparian and aquatic habitat.

Throughout the Encino Vista project area, trout populations are vulnerable to the impacts of

high intensity fire and associated impacts to streams and water resources and will benefit from forest treatments designed to reduce conifer encroachment, restore native species, and reduce sedimentation from roads and chronic headcutting.

We appreciate your recognition that roads can impair water quality and riparian function, thus harming native species like RGCT, by channelizing water and contributing to erosion and sedimentation. The proposed project provides an opportunity to address road impacts and move toward desired conditions for properly functioning road systems with limited sedimentation and impacts to water quality and native species. We support the road improvement, closure, and decommissioning treatments in the project area and believe it will result in natural resource benefits. Where resource impacts are occurring, naturalization and obliteration methods should be viewed as preferential to decommissioning, as this could result in larger benefits to habitat function and water quality.

Finally, in your analysis of the impacts of road improvements, we ask that you consider all of the potential impacts from improvement of forest roads, including those associated with increased vehicular traffic, changes in forest recreation, and other associated impacts that an altered road system can have on forest resources, including negative impacts on fish and wildlife.

### **Summary**

In conclusion, we appreciate this opportunity to participate in this planning process for the Encino Vista Landscape Restoration Project and thank you for the consideration of our suggestions and input. We hope the planning team finds our comments helpful and we remain available to answer any questions you may have. We look forward to working with the Santa Fe National Forest throughout the development and implementation of this project to ensure it results in healthier watersheds and ecosystems that are resilient to changing climate conditions, to the benefit of both native fish and the public.

Sincerely,



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