



Northern New Mexico Group

Rio Grande Chapter
1807 Second Street, Suite 45
Santa Fe, N.M. 87505

February 22, 2016

Carson National Forest

Attn: Forest Plan Revision
208 Cruz Alta Road
Taos, NM 87571

Comments submitted via email to carsonplan@fs.fed.us

Re: Scoping Comments on Carson National Forest Plan Revision

The comments submitted below are pursuant to the scoping process for the Carson National Forest Plan Revision currently underway.

These comments are submitted on behalf of the Northern New Mexico Group of the Rio Grande Chapter of Sierra Club that represents 2,500 members. Nationally, Sierra Club has 2.4 million members.

Summary

The Carson National Forest covers close to 1.5 million acres in northern New Mexico, and comprises some of the most biologically diverse lands and most significant watersheds in the state. Preserving water quality and quantity as well as wildlife abundance and diversity is central to our comments.

1. Climate Change impacts on Water and Vegetation Resources

Temperature rise and reduced levels of snowfall and other precipitation are calculated to escalate until 2100. Actions adequate to protect water supplies against an impact from a small temperature bounce may be completely inadequate to protect supplies from a sustained temperature rise or prolonged drought.

Recommended Actions:

1. Carson National Forest Plan should address predicted climate change variables and *give priority to alternatives* that ameliorate these changes and reduce impacts to the greatest extent to achieve the 2012 Planning Rules directive “to provide for the social, economic and ecological sustainability” 36 C.F.R. § 219.8.
2. Planning alternatives should include an evaluation of the *suitability* of lands for various uses and if a certain use will enhance or diminish the resiliency of the ecosystem to climate change.
3. The Plan should identify “Ecological Response Units” such as Spruce-Fir Forest and Piñon-Juniper Sagebrush as highly vulnerable to climate change and require that management decisions consider that as a significant risk factor before permitting any additional land use.
4. Collect data on “regional climate change” to help predict regional variables and impacts on wetlands and vegetation systems within Carson National Forest.
5. Implement strategic weather data collection similar to stations on the Valles Caldera National Preserve to predict wildfire, flooding and other significant conditions.
6. Account for the value of eco system services provided by the forest sequestration of carbon and reflect that value as a reduction in the Social Cost of Carbon (Total Economic Valuation).
7. Enhance forest sequestration of carbon through appropriate forest restoration projects.
8. Studies have identified several optimal tree species for carbon storage, and botanists continue to experiment with new hybrids. When choosing trees to plant, consider:
 - Fast growing trees store the most carbon during their first decades, often a tree’s most productive period.
 - Long-lived trees can keep carbon stored for generations without releasing it in decomposition.
 - Large leaves and wide crowns enable maximum photosynthesis.
 - Native species will thrive in your soil and best support local wildlife.
 - Low-maintenance, disease-resistant species will do better without greenhouse-gas-producing fertilizers and equipment.
9. Enhance forest watershed efficiency through appropriate thinning and prescribed burn treatments to achieve a mosaic of canopy and grassland for maximum snowfall accumulation, infiltration and lowest evaporation.
10. Protect what are termed “Wetland Gems” from destruction or misuse so they will continue their historic functions as biodiverse hotspots and wildlife habitats as their *primary and highest function*.
11. Manage and monitor existing surface waters for water quality and quantity.

Forest users should be made aware that almost half of Carson’s assessed water quality segments are “already impaired”. The Plan should require that any use – recreational, industrial or commercial – comply with the Clean Water Act and meet those water quality standards.

2. Climate Change impacts on Wildlife Resources and Biodiversity

In a rapidly changing world with hardening demands for water, land and food security, Carson National Forest should identify and limit all uses that will degrade or reduce the forest's ability to sustainably provide functioning watersheds, forage and breeding habitat for wildlife and healthy surface waters for fish and aquatic life.

Recommended Actions:

1. Promote monitoring of Species of Greatest Conservation Need and identify their habitats and ranges for management purposes and preservation.
2. Improve habitat connectivity and wetlands to ensure greater diversity and redundant populations of game and non-game animals as well as waterfowl and fishes.
3. Protect movement corridors and connect river valleys to montane ranges to maximize the resiliency of species striving to adapt to warmer and drier conditions by migrating to higher and cooler elevations.
4. Support the recommendations of The Wilderness Society regarding road and trail management to mitigate habitat fragmentation and widespread erosion.
5. Prohibit any commercial or recreational use that specifically degrades, disrupts or contaminates key habitat and breeding ranges as well as critical water supplies required for the maintenance of sustainable wildlife populations.
6. Manage habitats for maximum biodiversity to ensure food chains are left to be both redundant and able to sustain niche populations endemic to New Mexico and essential for the existence of rare plants and niche ecosystems.

Given the limited amount of known fossil fuel reserves under Carson National Forest, all unleased land should be designated as unsuitable for future fossil fuel leasing and development. *BLM should work with Carson NF to protect Carson's natural resources and adopt plans to maximize high carbon sequestration capacity (see recommendations from the Federal Forest Carbon Coalition) as well as watershed, water supply and wildlife resources.*

3. Carbon Sequestration

Resiliency – and carbon sequestration – is expressly called for by Executive Order 13,653, “Preparing the United States for the impacts of Climate Change.”

Section 1:

“The impacts of climate change – including an increase in prolonged periods of excessively high temperatures, more heavy downpours, an increase in wildfires, more severe droughts, permafrost thawing, ocean acidification and sea-level rise – are already affecting

communities, natural resources, ecosystems, economies, and public health across the Nation. These impacts are often more significant for communities that already face economic or health-related challenges, and for species and habitats that are already facing other pressures. Managing these risks requires deliberate preparation, close cooperation, and coordinated planning by the Federal Government, as well as by stakeholders, to facilitate Federal, State, local, tribal, private sector, and non-profit sector efforts to improve climate preparedness and resilience; help safeguard our economy, infrastructure, environment, and natural resources; and provide for the continuity of executive department and agency operations, services, and programs.”

Taking this direction further is Section 3 of the Order:

Mandating that agencies take action “to make watersheds, natural resources and ecosystems, and the communities and economies that depend on them, more resilient in the face of a changing climate.” This Order goes on to include both protection and restoration efforts.

Recommendations

The Rio Grande Chapter (Northern Group) has collaborated with the US Forest Service in fulfilling the monitoring, education and outreach components in northern New Mexico Collaborative Forest Restoration Projects (CFRP) with local partners in Canjilon, Rowe Mesa and Santa Clara Pueblo. These local projects require additional funding and the opportunity to treat more forest acres.

As signatories to the Rio Grande Water Fund in 2014, we strongly urge the Carson NF to increase watershed restoration projects and thinning projects to make watersheds more productive and to protect against catastrophic wildfire events.

The “wetland gem analysis” conducted by Amigos Bravos identified the following wetlands in the Carson NF as priorities for restoration:

1. Bobcat Pass
2. Cruces Basin
3. La Jara Canyon
4. McCrystal Creek
5. Midnight Meadows
6. Rio Santa Barbara
7. Serpent Lake
8. Valle Grande

We fully support the comments and recommendations contained in the full report and maps of these Gems found at:

<http://amigosbravos.org/on---the---ground---restoration>

Conclusion

The Carson National Forest Revision Plan offers the public the opportunity to push for the priorities it feels are most important.

Wild lands, water and wildlife are the resources our members value most in a national forest. Industrial development and extractive for-profit uses are not compatible with what a national forest provides to the **public at large**:

A functioning ecosystem, complete with water supplies that are sustainable and that are annually replenished by snow sheds and watersheds feeding the streams and run-offs, purified by meadows and wetlands, inhabited by fish and game accessible to the public, and populated by wildlife of all classifications that are vital keystone species for the complex and interrelated food chains and vegetative resources of the forest.

A haven of solitude, beauty and quiet away from the pressures of modern life.

A commons of national lands where all Americans are welcome to roam, enjoy and explore for their physical, mental and spiritual benefit.

Thank you for this opportunity to comment.

Sincerely,



Teresa Seamster, Ed.S.
Northern New Mexico Group Chair
Rio Grande Chapter of Sierra Club