



May 14, 2025

Regional Forester Michiko Martin, Forest Service Southwest Region
Deputy Regional Forester Kristin Bail, Forest Service Southwest Region
Forest Supervisor Jason Freeman, Lincoln National Forest

Submitted via email to: Michiko.Martin@usda.gov, Kristin.Bail@usda.gov,
Jason.Freeman@usda.gov

Re: South Sacramento Restoration Project, Lincoln National Forest

Dear Regional Forester Martin, Deputy Regional Forester Bail, and Forest Supervisor Freeman,

The Center for Biological Diversity has long supported the U.S. Forest Service's work to reduce the risk of large-scale, high-severity fire on the Lincoln National Forest. Since its inception, we have been engaged as a partner and stakeholder in the South Sacramento Restoration Project to support the goals of safely restoring ecologically beneficial fire, reducing fire risk, restoring forest structure, and protecting and enhancing plant and wildlife habitat of the Sacramento Mountains.

Given this engagement, we are disappointed to see the dangerously unrealistic plans set forth in the Final Environmental Impact Statement for the South Sacramento Restoration Project.

Rather than providing a plan for thinning sufficient to safely and quickly reintroduce beneficial fires at scales commensurate to risks, the Forest Service's plan of extensive logging and roadbuilding is predicated on industrial capacity that does not exist, would require decades to implement, is cost-prohibitive, and will cause needless environmental harm.

Such a plan will undoubtedly see another wildfire before implementation.

Specifically, the project involves the construction of 125 miles of new roads; logging across 53,910 acres—more than a third of the project area; logging of trees up to 24 inches in diameter—the largest and most fire-resistant trees—across 33,500 acres; and herbicide applications across thousands of acres each year, for the foreseeable future.

The project also includes the operation of large logging machinery on slopes as steep as 80%, even though no such machinery is available near the project and is likely to be prohibitively expensive and damaging.

The Forest Service's decision to pursue the actions described in the FEIS likely will ultimately preclude action in general, for lack of industrial capacity, for lack of agency staffing and capacity, for lack of the specialized machinery necessary to log steep slopes, for lack of federal funding to subsidize road-building and logging, and for lack of time should there be a large-scale wildfire within the project area before the decades of logging prescribed in the FEIS have been implemented.

The Forest Service's insistence on such dangerously unrealistic plans is particularly problematic given the disastrous 2024 Ruidoso fires, the risk to Cloudcroft, the Trump administration's ongoing reduction in the federal work force, and the drastic reductions in federal funding capacity.

We have engaged in this project's planning for eight years to address the urgent need to reduce fire risk in the Sacramento Mountains; scoping for the South Sacramento Restoration Project began in February 2017. It has now been six years since the release of the Draft EIS in March 2019, when we raised these issues of urgency and the need to focus on the most efficient and effective means of reducing the risk of large-scale high-severity fire. It is frustrating that, after eight years, the Forest Service has produced a dangerously unrealistic plan that not only fails to identify the most immediate and efficient path forward, but which is predicated on massive mechanical operations for which there is no local industrial capacity and that will require decades and prohibitively large public funding to complete.

Now, in the wake of an extremely dry winter and facing the prospect of a dangerous fire season, we urge the Forest Service to move decisively beyond this misdirected FEIS.

We urge the Forest Service to immediately promulgate implementation plans that utilize the minimum amount of strategic forest thinning (such as along roads or containment perimeters) necessary to safely and efficiently introduce and manage ecologically beneficial fire at landscape scales in the project area. This approach would fit within the bounds of the FEIS's effects analysis and, unlike the agency's dangerously unrealistic plans, it can be implemented in a timely manner.

We urge the Forest Service to publicly announce plans this year for moving forward in this manner so that we can safely and quickly reintroduce beneficial fire and can reduce the potential for high-severity fire at scales and in timeframes that are commensurate to risks.

We look forward to working with you as partners in this effort, and we request a meeting with you at the earliest opportunity, to discuss prospects for moving forward on this in 2025.

Sincerely,



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