

General C.F.

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July 27, 2000

Elizabeth Withers
NEPA Compliance Officer
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Dear Ms. Withers:

RE: DRAFT ENVIRONMENTAL ASSESSMENT FOR WILDFIRE HAZARD REDUCTION AND FOREST HEALTH IMPROVEMENT PROGRAM AT LOS ALAMOS NATIONAL LABORATORY, LOS ALAMOS, NEW MEXICO; PREPARED BY DEPARTMENT OF ENERGY, LOS ALAMOS AREA OFFICE; JULY 6, 2000

The following transmits New Mexico Environment Department (NMED) staff comments concerning the above-referenced Draft Environmental Assessment (DEA).

A. Background

In May 2000, The Cerro Grande Fire burned approximately 43,000 ac (17,200 ha) of land, of which approximately 7,500 ac (3,000 ha) were located within the Los Alamos National Laboratory (LANL) boundaries. The potential for regional and local wildfires poses a substantial risk to the current operational capabilities that ensure mission requirements are met at LANL. Consequently, there is a defined need to (1) reduce the risk of damage and injury to property, human life and health, and biological resources at LANL from high-intensity wildfires and (2) enhance forest health at LANL. This plan intends to address those concerns.

B. General Comments

The Cerro Grande Fire has significantly reduced the available Mexican Spotted Owl (MSO) habitat on the Pajarito Plateau. The Cerro Grande fire destroyed the majority of the suitable MSO habitat west and north of LANL in Pajarito, Water, Valle, Rendija, and Guaje Canyons (Figure 5, page 9).

The suitable MSO habitat at LANL is primarily limited to the mixed conifer/aspen vegetation zone. It should be noted that the extent of mixed conifer/aspen vegetation zone is limited to stringers in the western ends of LANL canyons (Page 5, Figure 3). These remnants of MSO



habitat will be critical for the survival of the MSO population at LANL (and the Pajarito Plateau) until severely damaged MSO habitat recovers. These mixed conifer/aspen stringers also provide habitat and migration corridors for other important species such as black bear.

C. Specific Comments

1. Page 16, Development of End-State Conditions:

The end-state conditions described may be appropriate for the Ponderosa Pine habitat or pinion pine/juniper habitats found at LANL but are not appropriate for the mixed conifer/aspen habitat.

The reduction of under story (removal of "ladder" fuels), reductions of canopy cover to 40-60 percent, separation of tree crowns, reduction of tree density, and reduction of ground fuels (MSO prey habitat & cover) all severely limit the suitability of MSO habitat. These end-state conditions, if applied to currently suitable or potentially suitable MSO habitat, would effectively eliminate that habitat as suitable or prevent potential habitat from attaining suitability in the future.

Recommendation: All mixed conifer habitat (suitable and potential MSO habitat) should not be treated and all treatments should be restricted to ponderosa pine or pinion pine/juniper habitat. This would provide protection for the MSO habitats without destroying them.

2. Threatened and Endangered Species Protection Measures section; Page 21, Mexican Spotted Owl section:

The actions proposed for both core and buffer areas for MSO Areas of Environmental Interest (AEIs) within 380 m of explosives testing and firing sites are excessive and if applied to mixed conifer habitat would render it no longer suitable MSO habitat. Limiting treatments to 10 percent in historically occupied habitats may be excessive treatment considering that the Cerro Grande fire has severely reduced MSO habitat over the entire Pajarito Plateau.

There is no mention of limiting treatments in unoccupied MSO habitat. This indicates that all MSO habitats will be subject to treatments. Considering the limited post-fire MSO habitat distributions at LANL and on the Pajarito Plateau, this could result in severe reductions in available MSO habitat.

Recommendation: See Specific Comment number 1.

3. Ecological Field Studies; page 23:

After noting the need for ecological studies of the effects of forestry treatments on local fauna and flora, the DEA states that these studies may be initiated based on need and funding (emphasis added). These post-treatment studies should be initiated based on need and should not be subject to future funding cuts.

Recommendation: The DOE should anticipate the need for these studies and should commit to allocating adequate funding for them.

4. Environmental Consequences; page 42:

USFWS concurrence with DOE's determination that management measures described in the Habitat Management Plan may affect, but would not likely adversely affect listed species, may need to be revisited considering the large-scale impacts of the Cerro Grande fire on MSO habitat and the potential effects of this Wildfire Hazard Reduction and Forest Health Improvement Program on available MSO habitat.

5. Air Quality Issues:

The LANL area is currently in attainment for all National Ambient Air Quality Standards (NAAQS). The no burn alternative would be the preferred alternative for air quality related issues. If either of the Limited Burn or Burn alternatives is chosen, LANL must work with the Department's Air Quality Bureau and receive permits prior to conducting these burns. If the program is carried out as described in the DEA, unacceptable impacts to air quality should not occur.

We appreciate the opportunity to comment on this document. Please let us know if you have any questions on the above.

Sincerely,



Gedi Cibas, Ph.D.
Environmental Impact Review Coordinator

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