



BILL RICHARDSON
Governor

April 20, 2009

Mr. Daniel J. Jiron
Forest Supervisor
USDA Forest Service
Santa Fe National Forest
1474 Rodeo Road
Santa Fe, New Mexico 87505

Dear Mr. Jiron:

The New Mexico Environment Department (NMED) provides this letter regarding the "Jemez Emergency Protection Order" Citizen Petition seeking closure of specific motorized routes in the Santa Fe National Forest (SFNF).

NMED's Surface Water Quality Bureau provided comments on April 22, 2008, during the initial scoping phase for development of a Travel Management Plan for SFNF. Those comments emphasized the need for SFNF to meet the guidelines of the current Forest Plan, including reducing road densities on Forest lands. Road density estimates should include user-created roads and trails, which typically lack design elements and best management practices (BMPs) to reduce their impact compared with system roads and trails.

The protection order identifies a subset of trails and roads within the Jemez Ranger District which have the greatest undesirable impacts to air quality, wildlife, water quality, and soils when compared with other trails and roads in the District. For example, the protection order describes 118 stream crossings and 4.36 miles of motorized routes adjacent to streams in a relatively small area south of the Valles Caldera National Preserve. This is more than half of the perennial stream crossings in the entire Santa Fe National Forest (Travel Analysis Process Report, p. 30). Another concern is that under-resourced enforcement and maintenance programs compromise the successful closure of motorized routes, resulting in ongoing negative water quality impacts. NMED also wishes to reiterate the need for SFNF to follow the site-specific recommendations provided in the April, 2008 correspondence from the SWQB, which focused on protection and restoration of streams on New Mexico's list of impaired waters.

The National Forest Management Act (NFMA) requires SFNF to specify resource protection goals in decision-making processes including development of the Travel Management Plan. To prevent further degradation of New Mexico's surface waters, SFNF must consider and address

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RON CURRY
Secretary
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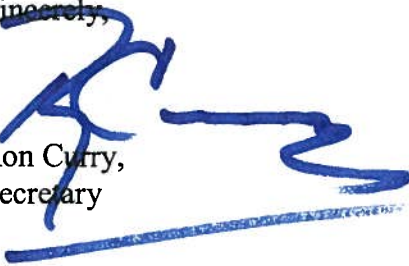
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damage to the watershed, and should ensure that the use, maintenance (or lack thereof) and unplanned construction of motorized routes do not compromise New Mexico's surface water quality standards.

In addition to water quality impacts, the protection order describes in detail the harm to human health and the environment caused by unmanaged motorized recreation on specific trails and roads in the Jemez Ranger District including the impacts of air pollutants generated by off-road vehicle engines. We request that the SFNF address these impacts in its closure of specific motorized routes and that decisions regarding road closures be made as quickly as possible to address these threats.

Sincerely,

Ron Curry,
Secretary

A handwritten signature in blue ink, appearing to be "Ron Curry", written over a horizontal blue line. The signature is stylized and somewhat abstract.