



**BlueRibbon Coalition / Sharetrails**

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**October 29, 2021**

Debbie Cress, Forest Supervisor

Santa Fe National Forest

11 Forest Lane

Santa Fe, NM 87508

BlueRibbon Coalition/ShareTrails (BRC) is writing to provide feedback for the Santa Fe Mountains Resiliency Project. BRC is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands and waters for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with natural resource managers and other recreationists. Our members use motorized and non-motorized means of recreation, including OHVs, horses, mountain bikes, and hiking to enjoy federally managed lands throughout the United States, including those of the Forest Service. Many of our members and supporters live in Oregon or travel across the country to visit Oregon and use motorized vehicles to access USFS managed lands throughout New Mexico. BRC members visit this land for motorized recreation, snowmobiling, sightseeing, photography, rockhounding, hunting, wildlife and nature study, camping, observing cultural resources, and other similar pursuits. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

Many of our members hold organized events that include organized rides in this area. A significant portion of the education mission of organizations like ours and the fundraising that supports organizations like ours comes from these organized events, and we see the

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continuation of these events as an integral expression of protected rights including freedom of speech and freedom of assembly.

### **Project Specific Comments**

We support the USFS utilizing an EA for planning this project, and we don't believe that the impacts from this project would require an EIS. The impact of leaving the forest vulnerable to catastrophic wildfire is far more significant than the minimal impacts from this project.

An article published by the Sacramento Bee<sup>1</sup> references the scientific work of several prominent wildfire experts who have rebutted the agenda-driven science that is often used to delegitimize vegetation treatment projects. NEPA requires that the agency use the best available science as part of its requirement to take a hard look at environmental impacts. We recommend that the USFS locate and incorporate the academic work of Crystal Kolden, Keala Hagmann, Susan Prichard and the hundreds of other academics who are backing up the need for proper management of forests to reduce wildfire risk. We also agree with the 15 major conservation organizations who have called on the USFS to actively manage forests to reduce wildfire risk.<sup>2</sup>

The EA says: The Proposed Action includes closure of 1.5 miles of Forest Service Road 79W near Arroyo Hondo, which would have some impact on the Arroyo Hondo trailhead access in this area. It would require all users to park at the Arroyo Hondo trailhead rather than continue driving up the rough road, which many prefer to hike anyway.

*BRC: It is not specified whether this is a temporary or permanent closure. This should not be a permanent closure and needs to be justified through the travel management plan as with all closures, temporary or permanent. All temporary closures should only be closed for a reasonable period of time which should be specified before the closure.*

EA: Off-highway vehicle riding may have more opportunities available as a result of the Proposed Action... particularly projects that create new access roads (both temporary and permanent), such as fuels reduction and forest restoration projects. These projects often encourage increased off-highway vehicle use through "curiosity," and users may use the access roads of the Proposed Action and other reasonably foreseeable projects' access roads to view the activities and/or sites (subject to existing New Mexico off-highway vehicle laws and regulations).

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<sup>1</sup> <https://www.sacbee.com/article254957722.html>

<sup>2</sup> [https://www.uniondemocrat.com/news/article\\_fdf9baea-f949-11eb-8ee9-53bf0505c634.html](https://www.uniondemocrat.com/news/article_fdf9baea-f949-11eb-8ee9-53bf0505c634.html)

*BRC: We support increased off-highway vehicle use as long as management and best practices are used. We believe that through proper forest management and roads will provide the resources to keep the forest healthy.*

BRC supports the broad project objectives to keep forests healthy and reduce the risk of wildland fires. We recommend using commercial treatment in the maximum amount of land possible. Best available science should be used in making these decisions. Past forest fires that have burned rampant because of the lack of forest projects should be looked at when making decisions.

The plan states a possible method to use is prescribed burns. If this method is chosen for an area, and a wildfire arises at any point, that wildfire should be treated as such and the USFS should not allow the wildfire to burn in order to meet prescribed burn objectives. This involves a lot of risks and wildfires should always be treated with as much urgency to suppress the fire as possible.

We would like to close by saying we support “shared use”. As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and nonmotorized recreation use often overlap as OHV’s often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

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Sincerely,



Ben Burr



Simone Griffin

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