

Dorothy Holasek

Ref to: FEIS/Draft ROD
Rim Country 4FRI Objection
RESPONSIBLE OFFICIALS AND FORESTS:
Judith Palmer, Forest Supervisor Apache Sitgreaves
Laura Jo West, Forest Supervisor Coconino
Neil Bosworth, Forest Supervisor Kaibab

April 19, 2022

USFS
Reviewing Officer
Southwestern Regional Forester
333 Broadway Blvd. SE
Albuquerque, NM 87102

REC'D 1022A
APR 26 2022
REGIONAL FORESTER'S OFFICE
SOUTHWESTERN REGION

Dear Reviewing Officer:

This letter is part II of my response to the FEIS/Draft ROD to accompany the objection letters dated April 12, 2022, and April 18, 2022. Because of the US Forest Service's history of altering my official comments in the 4FRI process by changing my submitted text to mean the exact opposite of what I submitted, I want all of my actual words to be printed in Rim Country 4FRI on line and in hard copy public comments as written in this letter and the letters dated 4-12-22 and 4-18-22.

I would like to bring special attention to two issues that I argue warrant my audience with the resolution team that convenes prior to the the official ROD being signed into the Federal Register.

The first is the BLACK CARBON SOOT that will be released through the prescribed burns and managed wildfires that the USFS will conduct in 4FRI. I brought this issue forward during the DEIS objection period in the last section of my letter entitled "OVERVIEW" dated December 27, 2019. In my letters sent to your office dated April 12, 2022 and April 18, 2022 under the section entitled "BLACK CARBON SOOT", I again describe the mechanism by which the albedo effect of our alpine snow and ice fields is degraded by the black carbon soot produced in the smoke of prescribed fires and managed wildfires. I also enclosed seven articles for your reference on black carbon soot. In, "Global and Regional Climate Changes Due to Black Carbon", Nature Geoscience, 1, 221 -227 (2008), "...emissions of black carbon are the second strongest contribution to current global warming, after carbon dioxide emissions." Because I did not find a discussion of black carbon soot in the FEIS/Draft ROD for Rim Country 4FRI, I believe that I am eligible for an official objection audience with the resolution team.

Secondly, the references cited in the FEIS/Draft ROD 4FRI are not the best available science. It cites the "Prescribed Burns and Radiation" Pamphlet produced by the USFS which should be taken down from from the USFS website for saying that prescribed burns cannot get hot enough to re-supend CS-137 into the atmosphere. The "New Mexico studies" loosely referred to in the FEIS/Draft ROD 4FRI are also not the best available science as I have explained in my response to the DEIS and, again, in my response to the FEIS/Draft ROD. In "Cesium Emissions From Laboratory Fires", Journal of the Air and Waste Management Association" 68, 2018, Issue 11, that the FEIS/Draft Rod quotes, the authors explain that the exposure they are assessing is EXTERNAL EXPOSURE ". This has always been one of my major points. Just talking and swallowing saliva outdoors constitutes internal exposure along with inhalation.

Once the radionuclides are inside the body they can lodge there and continue to irradiate the surrounding tissue even after the person is dead. The authors also point out that their study does not represent other radionuclides that may be present such as strontium 90 and plutonium 239. What they do suggest as a remediation is for firefighters to wear a high tech breathing apparatus and for land managers to find ways to sequester the contamination such as “Planting trees and shrubs is a long-term option to help fix the contaminants on the site.” NO WHERE DO THESE RESEARCHERS RECOMMEND BURNING FORESTS THAT ARE CONTAMINATED WITH THESE RADIONUCLIDES.

No where in the NEPA, Executive orders 12890, 13990, The Council of Environmental Quality, or the USDA's Environmental Justice Programs does it say that if a threat to public health is just so big or so difficult to understand or so complex that the USFS can simply dismiss it as outside the scope of their analysis.

I argue that I am eligible for an official objection audience with the resolution team based on the the failure of the USFS to use the best available science when it comes to both of the above subjects and their poor comprehension of these issues. In the instructions of how to qualify for an official objection with the resolution, we are to offer alternative methods of forest management. I have done so in in both my objection to the DEIS and the FEIS/DraftROD for Rim Country 4FRI. My argument has always been that the gravity of the harm to our citizens is so great that USFS needs re-design their goals in order to protect our citizens .

Sincerely



Dorothy Horasek