

From: [REDACTED]
To: FS-objections-southwestern-regional-office
Subject: Objection to the Santa Fe National Forest final EA FONSI
Date: Monday, May 9, 2022 3:28:57 PM

Regional Forester
333 Broadway SE
Albuquerque, NM 87102

A Fatal Prescription: Nil Nocere!

I object to the Santa Fe National Forest final EA 'findings of no significant impact' (FONSI) for the proposed Santa Fe Mountains Landscape Resiliency Project (<https://www.fs.usda.gov/project/?project=55088>)

Given that I submitted comments throughout the NEPA process in July 2019 for the Scoping document and October 2021 for the Draft EA (see embedded), I understand that I have standing to object. I've consistently commented that a full EIS is necessary to address the breadth and complexity of sustaining healthy ecosystems.

The COSTS of USFS policies greatly Outweigh the Benefits and the NEPA process must account for ALL social, environmental and economic cumulative impacts. The draft EA FONSI determination for the Santa Fe National Forest is flawed and must be reevaluated in a full EIS in light of recent **uncontrolled prescribed burns** and current complex scientific data on climate change increasing droughts and severe rainstorms causing erosion.

The Draft EA did not adequately address the scale and complexity of intense fires destroying organic matter in soil, increased severity of rain causing erosion of topsoil, degraded water quality resulting in permanently changing the landscape from woodlands to grasslands. My previous comments on the draft EA further described why the EA is flawed including:

"USFS has not provided adequate cost-benefit analyses with alternatives that include impacts to climate change, increases in carbon emissions from prescribed burns, use of herbicides, degraded water quality due to the prescribed burns from chemicals, erosion, and more impacts."

Another major concern is the scale of proposed prescribed burning of 28,000 acres needs to be addressed. Only a through EIS alternatives with significant public involvement and extensive up-to-date science will be able to resolve these challenging issues.

It appears obvious that uncontrolled prescribed burns have become catastrophes including the current Las Dispensas/Hermits Peak fire in Las Vegas, New Mexico and previously the Cerro Grande fire in Los Alamos, New Mexico in 2000. According to the Government Accountability Office report (GAO, <https://www.gao.gov/assets/t-rced-00-273.pdf>)

"The Cerro Grande fire exposed policy implementation issues that need to be addressed for managing prescribed fires. Most of the issues involved procedural gaps or a lack of clarity about how policies are to be implemented. These issues affected both the planning and implementation of the burn."

Why didn't the USFS adequately heed GAO's warning that have allowed numerous uncontrolled 'prescribed' burns? USFS proven malfeasance that they cannot control prescribed burning shows they have become the ARSONIST no matter what good intentions they may have had originally.

Change happens! Medical doctors and drug companies are being forced to STOP PRESCRIBING

painkillers after prescribed addictive opioids have resulted in approximately one million fatalities in the past 20 years just in the U.S. obviously contrary to the Hippocratic Oath of 'nil nocere' of do no harm. The USFS is responsible for property damage, public health, and more. Your destructive and immoral policy of Prescribed Burns is outrageous and must immediately stop!

I agree with a friend of mine who said the NEPA document must include air quality tests before, during and after the burns with charts showing the ill affects of smoke inhalation on babies, the sick and elderly. Decisions regarding our environment and what governments and private citizens do on the land cannot be based purely upon historical records since our entire local/global climate has drastically changed and we must now going forward make decisions based upon present and current data, and not just do things the same old way as has been done for a hundred years!

Here are some photos given as testimony to Congress:

Dominick DellaSala's slide of intact forest vs. fuel treated forest within the Santa Fe National Forest, shown at the March 16 House Environment Subcommittee hearing:

dominick comparison slide



Header photos

Top left – Santa Fe watershed, thinned in the early 1990's and burned twice. Photo: Fred King.

Top right – Prescribed burn smoke over the Santa Fe ski basin. Photo: Satya Kirsch.

Bottom left – A USFWS firefighter watches a prescribed fire. Retweeted by Santa Fe National Forest. Photo by USFWS.

Bottom right – La Cueva Fuel Break, thinned in 2017 and burned once. Photo: Lyra Barron.

Here are my previous comments on the Draft EA from October 2021:

"The Santa Fe Mountains Landscape Resiliency Project #55088 is unacceptable as described in the current draft EA. I have lived in that area and enjoyed hiking on USFS managed land. Myself and many friends/residents have asthma and other health concerns that require clean air, minimal not increased burning, and notifications prior to prescribed burns. How will information on burning schedules be communicated and in what languages - including to the local native Americans, Hispanics, and Anglo citizens? The federal government should consider people at risk of health impacts from prescribed burns and offer mitigation such as HEPA air filters.

A full EIS is needed to provide adequate public awareness and evaluate this major federal action. The final PEIS National Forest System Land Management Planning dated 2012 is out of date to support the draft EA for Santa Fe and many other parts of the US where similar measures are being proposed. The USFS has not provided adequate cost-benefit analyses with alternatives that include impacts to climate change, increases in carbon emissions from prescribed burns, use of herbicides, degraded water quality due to the prescribed burns from chemicals, erosion, and more impacts.

It is unreasonable to compare potential future wildfires as the motivation for prescribed burns when there have already been many wildfires in the Santa Fe National Forest. Drought conditions will only worsen with increasing climate change making the forest vulnerable to future fires even after prescribed burns reduce the "fuel." Given the importance of this decision on the region, more updated scientific consideration is needed through the EIS process."

Here are my comments on the NEPA Scoping document:

"Re: Comments for the Santa Fe Mountains Landscape Resiliency Project
July 8, 2019

From:

Bill Dam



To:

Mr. James Melonas, Forest Supervisor
Hannah Bergemann, Fireshed Coordinator
Joe Norell, Deputy Forest Supervisor
Josh Hail, Ecosystems
Lance Elmore, Fire and Aviation
Julie Anne Overton, Public Affairs Officer
c/o Santa Fe National Forest
11 Forest Lane
Santa Fe, NM 87508

Dear Mr. Melonas, Ms. Bergemann, Mr. Norell, Mr. Hail, Mr. Elmore, and Ms. Overton:

The USFS Scoping Document provides a general description of the proposed actions for the Santa Fe Mountains Landscape Resiliency Project. The purpose and need statement does not adequately provide justification for burning up to 43,000 acres which is about 40% of the project area. This also contradicts establishment of a multi-age young to old growth forest as desired in the forest structure. Additional historical context is needed to describe extent of significant previous fires to explain how these devastating fires were not adequate in order to justify that new fires are beneficial to the environment. Given the significance of the Santa Fe National Forest and major federal action impacting many diverse cultures, a full EIS is needed rather than an EA and the public comment period should be extended to 90 days. The cost-benefits must consider numerous factors including impacts on public health, socioeconomics and the environment.

I feel the last thing we need is to cut our carbon sequestering plants. They provide Santa Fe our only buffer against the climate crisis. We truly need every tree we have and every other plant in Santa Fe to help us bring moisture and rain, keep the ground cool as the temperatures rise, and decrease winds and the spread of pests and other parasites on trees that occur with thinning. Leaving downed trees/ slash on the ground can also draw bark beetle infestations. We cannot afford to lose thousands of healthy trees as occurred in the past due to bark beetles.

I would also like you to consider the health of the wildlife and the public when using aerial ignitions containing potassium permanganate, ethylene glycol and diesel fuel and how these are currently affecting our health and well-being. These harmful chemicals also impact the economy, tourism and reputation of Santa Fe as one of the cleanest cities in the country.

I have asthma and know many citizens of Santa Fe are complaining about current fires and the health effects (whereas the equally impacted wildlife cannot). I personally am severely affected as are many people I know by the smoke and the toxic chemicals that are in the air when prescribed burns are being conducted.

This year, 2019 has been especially difficult as the USFS has extended prescribed burns and managed burns into July. These burns are becoming larger and larger and smoke from burns from other US Forest Service areas of New Mexico are reaching Santa Fe. People with Chemical Sensitivities, Asthma, Chronic Obstructive Pulmonary Disease (COPD), Emphysema, Heart disease and other serious health and respiratory disorders are being made extremely ill from all the smoke. Our children and the elderly are especially affected. Santa Fe has a large population of elderly and retired people.

It appears the US Forest Service does not consider smoke from the prescribed burns to be a public health hazard. It is time to wake up to this fact. This smoke is literally life threatening for many people.

Please take into consideration all the impacts of this Santa Fe Mountains Resiliency Project. Please consider the health of the people and animals. Please extend the deadline for public comments. Please provide an Environmental Impact Statement."