

**Multiple
Chemical
Sensitivities**

TASK FORCE of New Mexico

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May 11, 2022

To: Debbie Cress
Forest Supervisor
Santa Fe National Forest

Re: The Santa Fe Mountains Landscape Resiliency Project
Española and Pecos-Las Vegas Ranger Districts
Santa Fe National Forest

On behalf of the Multiple Chemical Sensitivities (MCS) Task Force, I submitted comments on the draft Environmental Assessment (EA) for this project and therefore have standing to object to the Final EA.

Our comments expressed concern over the public health impacts of smoke from prescribed fires. Our comments included a report entitled "*Human Health Effects of Wildland Smoke*" that summarized the most up-to-date and available science on this issue. Over 50 reference articles were also submitted with the report.

The Final EA completely avoids discussion of the public health impacts of smoke. These concerns were dismissed without analysis or justification. According to the section 3.8 Air Quality and Climate, the Final EA did not even attempt to evaluate the impact of prescribed fire smoke on *people*. The only question asked was "*How would the proposed prescribed burning treatments impact local air quality?*" Then the Final EA dismissed the impact as being minimal and transient, again without analysis or justification.

Questions not even asked, let alone answered, include the impact of prescribed fire smoke on humans, especially vulnerable populations; the enhanced impact of breathing smoke during the Covid pandemic; the different toxicity of smoke from prescribed fire compared to wildfires, considering the increased PM2.5 emissions per amount of vegetation burned and toxicity of accelerant chemicals); the inadequacy of National Ambient Air Quality Standards (NAAQS) to protect public health; the toxicity of burning vegetation to which herbicides have been applied; and the total public health impact of prescribed fires compared to wildfires.

According to Table 3.31 on page 3-94, the amount of PM2.5 emissions from prescribed fires in the U.S. is almost equal to the amount from wildfires. In the aforementioned report, an Australian study found that of the total estimated health costs from particulate pollution, 51% was attributable to prescribed burns and 41% to wildfires. In other words, there is much evidence that the impacts on public health of breathing smoke from prescribed fires is quite significant.

Because the impact of this project on the environment, including the human environment, will undoubtedly be significant, an Environmental Impact Statement (EIS) must be done. The EIS should include, among other things, a careful and comprehensive analysis of the adverse public health impact from prescribed fire smoke.

An EIS is also required because the Final EA failed to use the best available science to analyze the health impacts of prescribed fire smoke. In fact, it used almost no science at all.

Please keep me informed on developments regarding this project.

Thank you.

Ann McCampbell, MD
Co-Chair
MCS Task Force of NM