

**Henry P. Roybal**  
*Commissioner, District 1*

**Anna Hansen**  
*Commissioner, District 2*

**Rudy N. Garcia**  
*Commissioner, District 3*



**Anna T. Hamilton**  
*Commissioner, District 4*

**Hank Hughes**  
*Commissioner, District 5*

**Gregory S. Shaffer**  
*County Manager*

May 12, 2022

To Debbie Kress, Forest Supervisor of the Santa Fe National Forest

Email: [objections-southwestern-regional-office@usda.gov](mailto:objections-southwestern-regional-office@usda.gov)

**Re: Santa Fe Mountains Landscape Resiliency Project #55088**

Santa Fe National Forest

Dear Supervisor Kress,

My last letter dated 7/10/2019 (attached) outlined major concerns with Forest Service action on the Santa Fe National Forest that have not been addressed nor reconsidered. My explicit concerns about the ecological NON-necessity of thinning or burning “for the forest” during accelerating climate change were partnered with concerns about what I now know is “potential regeneration failure” of ponderosa and other tree species in ponderosa, pinon-juniper, and mixed-conifer forest of the SFNF. These actions are sufficient to destroy the ecological integrity of the forest, and its ability to provide this region with ecological resources including temperature mitigation and other climatological good.

The most current science dismisses the fire science used by the Forest Service to justify its prescribed burns, and counters their need to 90% thin the majority of our surrounding forest with more recent research showing that all tree mortality is reduced by a light touch approach rather than logging, thinning and burning (Bradley, Hanson, DellSalla, 2016, Ecosphere v7). This renders most actions on the Santa Fe undertaken by the Forest Service not only NOT supportive of all forest resources, but destructive of them; not preventing fire or wildfire spread, but enabling it; and NOT reducing overall risk of fire, but increasing it. I therefore object to your ongoing pattern of thinning and prescribed fire on the SFNF, especially the SMLRP, and especially in the Santa Fe watershed.

I explicitly object to

- assumptions of thinning as restorative, without current ecological pattern analysis given climate change;
- assumptions of prescribed fire as risk-mitigating when the scientific consensus is at best equivocal
- ponderosa treatments of even light fire, which would cause 100% ponderosa seedling mortality (Partelli-Felton et al, 2019)
- wide-scale, planned-repeat every-3-years burning of any and all of the Santa Fe watershed, or indeed the Project area. This rate is almost half the lowest estimates for our natural fire return (which may be 10 times too low: your estimates of 5-15 years are countered by other estimates of 55-year fire return) – a rate one expert told me was “not an ecological rate, not an evolutionary rate” for our forests, and would decimate even our largest trees given the 12-25% absolute mortality rate for all trees in any fire, even low-intensity prescribed burns. I am currently researching solutions and remedies which we must work on together.

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Your apparent rejection of climate change which resets all conditions, risks, costs and benefits that we must consider in managing a forest in clearly accelerating climate change, indicated that core Forest Service assumptions about treatments and impacts were wrong even in 2019, that mistakes would be made, and that risk would be increased by the agency we trust to reduce it.

This is all proven by the two escaped wildfires you set as prescribed burns. The Hermit's Peak and Overflow fires, set on a Red Flag day, means the we can no longer trust you in any capacity to correctly assess costs, benefits or risks of the "fuel-reduction" management actions the Forest plans to continue as soon as public attention wavers. Forest Service willingness to set a fire in conditions that should have prevented it, shows us directly that the FS does not and has not placed any value on New Mexican residents, communities, or water infrastructure or resources. FS willingness to risk cities, health, the Santa Fe and New Mexican economy, and even the forest resources that it is tasked with protecting, means Santa Fe County requires in-depth discussions with the Forest Service before any further risky actions are undertaken by you – and by that I mean any fuel reduction plans.

Given this, I formally demand that you postpone all prescribed burns – even those agreed to at the federal level and already approved – within the Santa Fe watershed, and the entire SFNF, until formal discussions have been held with my, and other county, city, and state offices; until we convene meteorological, ecosystem, forestry, and other fire experts than those who have apparently been ill-advising you on the risks and impacts of fire; and until local officials and communities have received extensive briefings from you and others on alternative plans and other options to mitigate fire in Santa Fe County.

Your risk assessments appear to be wildly optimistic and even in denial of the reality of facts and risk. The SMLRP assumptions appear to be that, if Forest Service implements fuel treatment on these mountains surrounding Santa Fe, there will be NO fire there, and if you do not do fuel treatment, there is a 100% likelihood it will totally burn. Ridiculous. At the least, you are ignoring your own risk of starting fires, and the history of prescribed fire in New Mexico.

I therefore request an immediate new statistical analysis of what the true risk of lighting fires in Santa Fe County is, through independent, not Forest Service, scientists. Your stated "one percent escapes" is too much, but two of the biggest fires in New Mexico history is **far** too much, and clearly you have NOT accounted for risk appropriately.

I also formally request the appended reports and documents be provided to Santa Fe County at least 6 (six) months before any further burning – see appended at end of this objection letter.



Anna Hansen, Santa Fe County Commissioner, District2  
505-920-0957

**Appended – formal requests to Forest Service:**

We request the following documents, explanations, and answers to allow us to evaluate Forest Service demonstration of its commitment to resilient forest rather than expensively burned and cut forest, and to evaluate all policies, analyses and evaluations of risk as it pertains to Santa Fe County and other surrounding counties.

1. Is it the case that the Forest Service will only provide negative treatments to the SFNF, that your only treatments are cutting and burning? Please explain why virtually NO positive treatments – no repair of hydrogeography, no planting, tree migration, no seedling starts, no removal of roads, repair of habitat – are being used to build the resilience and ecological integrity of the Santa Fe National Forest?

2. What is the total cost of manpower, equipment, and other expenditures needed to fight the Hermit's Peak/Calf Canyon fire started by the Forest Service? How much water have you bought or paid for to fight this fire? What would it cost to replant burned sections of the forest? Do you expect forest to regrow in these areas, please describe on a map what you expect to occur there in terms of future ecology and water generation by the forest.

3. What would equivalent numbers be, if the SMLRP project of 1000 acres planned to start on April 18, had blown up into an equivalent fire from Canada de los Alamos across the front range of Santa Fe north to Hyde Park Road? How would you, the Forest Service, replace the city's water reservoirs and water resources to serve the County and City of Santa Fe? What do you think would be the cost of replacement of Santa Fe real estate within the SMLRP project area? What provisions have been made by the Forest Service to specifically evaluate the induced risks of wildfire by prescribed burn? What other treatments, options, and approaches did you consider in treating the Santa Fe National Forest, especially the SMLRP project area?

4. Provide references, materials, estimates, and assumptions on any risk assessments done on fire in the SFNF:

-on assessments of wildfire risk from prescribed burns, or thinning-related slash piles.

-on any and all follow-up from the Cerro Grande fire or the recent Pacheco prescribed burn.

5. Ranger Sandy Hurlocker asserted after the Pacheco prescribed fire, which almost escaped multiple times, that many many additional protections and checks would be put in place. What additional specific protections, guidelines, procedures etc., has the Forest Service put in place in response to the Cerro Grande escape and more recent prescribed burns?

6. What exact personnel have been attending and guiding prescribed burns in the Santa Fe National Forest? Participants at the time described their training as "none". What is their rate of pay, and what exact training have they received:?

a. For the Hermit's Peak prescribed burn

b. For the Pacheco prescribed burn

c. For the planned April 18 SMLRP prescribed burn in the Santa Fe watershed?

7. Provide the following:

Forest Service appraisal of health impact to residents from smoke during prescribed burns? During prescribed-burn induced wildfires?

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8. Risk analysis and all components used to determine it, of individual components of the FS approach on the SFNF, including

-increased risk caused by slash piles

-increased risk DUE to prescribed burning, as your beliefs and assessments of risk of fire being reduced in prescribed burning is not being upheld by reality. Notably, the Cerro Pelado fire currently burning in Los Alamos, appears to have started in a former prescribed burn, and has traveled through two further prescribed burn locations of the Forest Service without clear reduction of fire at all!