

January 22, 2023

From: Patricia L. Mann RN, MSN

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**Re: Santa Fe Mountains Landscape Resiliency Project- Objections**

**Responsible Official — Acting Forest Supervisor James Duran. The project is located in the Santa Fe National Forest, in the Espanola and Pecos – Las Vegas Ranger Districts.**

To US Forest Service, Santa Fe National Forest,

I am writing to state my objections to the current and "final" Environmental Assessment for the Santa Fe Mountains Landscape Resiliency Project. In my email today, I am referring first to my previous draft environmental assessment comments dated October 27, 2021 regarding this project as below. The USFS in their final EA does not adequately address my concerns stated during the comment period.

I will then state my objections to the final EA for this project.

See below.

**My comments on draft EA, October 27, 2021:**

The Santa Fe Mountains Landscape Resiliency Project

- October 27, 2021

From:

Patricia Mann RN, MSN

Santa Fe, New Mexico

Re: My Comments on The Santa Fe Mountains Landscape Resiliency Project

As a native New Mexican, Health Care Professional and resident of Santa Fe, I am deeply concerned about the enormous size of the proposed Santa Fe Mountains Landscape Resiliency Project and that there has been no Environmental Impact Statement (EIS) regarding its effects on our beloved forest or the health of people, our forests, wildlife and the quality of our soil, air and water.

I demand there be an Environmental Impact Statement. It is unthinkable that a project of this magnitude would not have a full EIS.

I am concerned about the ecological impacts on our forest as the plan includes major thinning and burning on thousands of acres of forest land, the use of heavy equipment and the creation of new roads (even if “temporary”) into forest areas as well as the use of herbicides for invasive plant species.

I would also like you to study the health impacts on our air quality, soil quality and water quality and the impact on the environment as a whole as well as on our wildlife and people when doing prescribed burns. Toxic smoke is emitted from these burns and causes harm to all wildlife and all people, not just those who are “smoke sensitive” or who have underlying conditions such as COPD, Asthma, Chemical Sensitivities, Heart Disease, etc.

It is also important to study the impact of ignitions using accelerants, whether doing hand ignitions and/or creating containment lines using diesel fuel or doing aerial ignitions containing potassium permanganate, ethylene glycol or other toxic chemicals.

A thorough study should be conducted as to how these toxic chemicals

- being released into the environment are currently affecting our health and well-being. As I write these comments today, there is a prescribed burn going on in the Santa Fe Watershed that has been started using toxic chemical accelerants. This is our watershed. These chemicals will get into our air, soil and water. The smoke from prescribed burns and these harmful chemicals also impact the economy, tourism and reputation of Santa Fe as one of the cleanest air cities in the country.

Many citizens of Santa Fe are complaining about prescribed fires and the negative 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 chemical accelerants that are in the air when prescribed burns are being conducted.

These burns are becoming larger and larger and more frequent. 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, Pulmonary Fibrosis, 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.

The proposal to use herbicides in the Santa Fe National Forest is also a public health threat. Herbicides are toxic chemicals that can get into the air and pollute land and water. An EIS should also examine the adverse health impacts of herbicides on the human environment, including impacts on vulnerable populations. Invasive plants can be manually removed thus avoiding introducing toxic chemical herbicides into our environment.

Recently, in August, 2021, (August 9-12) the herbicide "Rodeo" containing the toxic chemical glyphosate, was sprayed on invasive plants, the Oxeye Daisy, on the East Fork trail in the Jemez Mountains. The trail was left open during the spraying and any hikers as well as the pesticide applicators would have been exposed to this toxic chemical. These herbicides can also persist in the environment.

- Glyphosate has been linked to many forms of cancer and class action suits are currently ongoing on behalf of those who have been chemically injured by exposure to glyphosate including applicators of glyphosate-containing herbicides as well as others who have been exposed to glyphosate and now have terminal cancers.

Additionally, these herbicides are severely impacting our wildlife. Every year the Wildlife Center in Espanola treats birds, including our beloved raptors, for herbicide poisoning. Many cannot be saved. These herbicides go right up the food chain and are impacting not only people but all of our wildlife including our beneficial pollinators such as bees, butterflies and

moths.

Please take into consideration all the impacts of this Santa Fe Mountains Resiliency Project. Please consider the health of the people and animals.

Please provide an Environmental Impact Statement (EIS).

Thank you,

Sincerely,

Patricia Mann RN, MSN

Health Care Professional, Registered Nurse

Santa Fe, New Mexico 87508

As I previously stated, The US Forest did not sufficiently address my concerns as stated above during the comment period in the Final Environmental Assessment. It is imperative these issues be properly addresses using a Full Environmental Impact Statement for this extensive project.

**Here are my Objections to the US Forest Service's final Environmental Assessment which includes not properly addressing my concerns stated in the comment period and new objections to your final EA:**

1) An Environmental Impact Statement must be completed for the project.

— A EIS is required when a project has significant impacts on the human environment that is controversial, and when a project damages forest resources.

— A range of alternatives is required. “Action” and “No Action” are not enough. There must be other alternatives, including a conservation alternative. This project is complex and has a substantial impact on the public. A range of alternatives will provide options to find a solution that is acceptable to the public and beneficial for the forest ecosystem.

— The frequent prescribed burn smoke in the mountains outside of Santa Fe would have a substantial adverse impact on human health. It is in no way proven that prescribed burns substantially replace wildfire or that prescribed burns do not increase the amount of smoke we breathe. In fact, indications are that prescribed burns are largely in addition to wildfire. The Forest Service must do the analysis to determine how much more smoke the public will be breathing as a result of this project, compared to the “No Action” alternative.

— Widespread and aggressive thinning and burning does not improve the scenic quality of the forest; it degrades it.

2) The condition-based approach should not be used for the analysis of this project.

— The parameters for treatments are so generalized that we know neither where the treatments will occur nor how they will be carried out in a site-specific way.

— The EA contains maps that show potential thinning/burning units across the project area, but it is also stated that treatments may be implemented outside of the areas designated on the maps: “The actual location of forest treatments would occur where deemed appropriate at the time of implementation.” (Final Environmental Assessment, p. 44)

— Residents of forest communities want to know if thinning will occur adjacent to communities, and how severely.

— We need more information about where and how treatments would occur in Inventoried Roadless Areas, which are intended to be preserved in a natural state.

3) The environmental assessment analysis does not use a broad range of the best available scientific information

— The Forest Service used studies done by scientists that agree with their ecological perspective and virtually none from scientists with a conservation perspective.

— The areas of the project where thinning and repeated prescribed burning is done will be essentially lacking an understory. There were no references in the environmental assessment to indicate that historical forests had no substantive understory. The existence of an understory is a natural condition at this time, and beneficial to some wildlife species.

— The analysis over-relies on fire scar studies to reconstruct historical fire regimes, and it provides no discussion of limitations of such studies. Limitations include that the fire scar studies utilized a small number of plot samples, and that trees that burned at high intensity no longer exist. Multiple lines of evidence are necessary.

— The analysis assumes that proposed fuel treatments will be beneficial to Mexican spotted owls when there are a number of studies calling that into question.

— There is no analysis of the health effects of the increased amount of smoke the public will breathe due to prescribed burning.

— There is no analysis that estimates how much smoke that is emitted by wildfire compared with the combination of prescribed burns *and* wildfire.

— Burning every 5-15 years is too frequent and does not allow the understory to return.

— High severity fire is defined in the environmental assessment as over 75% tree mortality, while most studies define high severity fire as 90% tree mortality. As a result, the potential for high severity fire is overstated.

— Thinning from approximately 500 trees per acre down to 2-50 trees per acre is approaching a clear-cut. It leaves the forest too dry and open, can cause leave trees to blow over, and allows the wind to whip between trees, fanning up flames in a wildfire.

4) The Forest Service has not genuinely included the public in the analysis process

— The Forest Service has not given sufficient notice of project comment periods. A number of commenters stated in the scoping comments that they did not know about the comment period in time to write thorough comments.

— The Forest Service only presented science at public meetings that was in accordance with their own ecological perspective.

— The Forest Service did not allow the public to view any of the over 5,000 public scoping comments online or even in person at Santa Fe National Forest headquarters, for over a year.

— Freedom of Information Act (FOIA) requests are often fulfilled by the Forest Service months or even years after the request is made, and often past the time that the FOIA request will be useful to the requestor.

— The Forest Service has been understating the extent of the project to the public. Forest Service personnel on multiple occasions stated in the media they would only be thinning small trees, when in reality the draft environmental assessment states that larger-sized trees will be thinned.

The Forest Service defines small trees as trees under 9.9” DBH (diameter at breast height), and they propose to thin trees up to 16” DBH.

5) The Forest Service’s project planning and analysis must:

— Include an Environmental Impact Statement, with a full range of alternatives.

— Greatly reduce the amount of trees removed (leave many more trees per acre) and greatly reduce the number of acres that will be treated. Consider reducing by at least 75%. We need more trees, not fewer, for carbon sequestration and to hold moisture into the forest. Forests that are thinned and/or logged tend to burn more often and at a higher intensity, not at a lower intensity. .

— Greatly increase time between prescribed burn treatments.

— Leave most of the forest understory, which is an important part of forest ecology.

— Close and decommission forest roads which increases fire risk and are damaging to forest ecology. Do not build more roads or improve existing roads, unless there is a critical need to do so.

— Further analyze impacts of thinning and prescribed burning on Mexican spotted owls. The analysis of this in the environmental assessment is inadequate.

— Do not masticate trees or understory.

— Keep cows out of riparian areas, and preferably keep cows out of the project area altogether.

— Reduce the amount of prescribed burn smoke emitted from the project by at least 75%

— Do not thin in Inventoried Roadless Areas

– Consider the potential for escaped prescribed burns, such as the escaped burns that caused the Hermits Peak/Calf Canyon Fire. There is no mention of the possibility, risks or effects of escaped prescribed burns in the [Santa Fe Mountains Project Final environmental assessment](#).

Please, considering the tragic Hermit's Peak/Calf Canyon fires that were both started by the US Forest Service and combined to cause the largest fire in New Mexico's history (one fire the USFS started in Winter and one in our extremely windy Spring), it is time to begin to listen to the constituents, the Santa Fe County Commissioners, the New Mexico US Senators and US Representatives regarding lack of safety by USFS when conducting prescribed burns. It is time to reconsider your approach to Forest Management and reduce the number and size and location of any prescribed burning. The USFS works for us, the constituents. It is our National Forest. Please listen to our concerns!

Thank you,

Sincerely,

Patricia L. Mann RN, MSN

Health Care Professional, Registered Nurse

Santa Fe, New Mexico, January 22, 2023