

Justin S. Greene
Commissioner, District 1

Anna Hansen
Commissioner, District 2

Camilla Bustamante
Commissioner, District 3



Anna T. Hamilton
Commissioner, District 4

Hank Hughes
Commissioner, District 5

Gregory S. Shaffer
County Manager

January 23, 2023

TO THE FOREST SUPERVISORY CHAIN of the SFNF
Acting Supervisor of the Santa Fe National Forest James Duran or other
Email: objections-southwestern-regional-office@usda.gov
Re: Santa Fe Mountains Landscape Resiliency Project (SFMLRP) Project 55088, SFNF

I am a public official with considerable overlapping responsibilities to those of the Forest Service. My main responsibility is toward the health and safety of my constituents, therefore I ask you to consider that my comments arise from concerns regarding this region's air quality, water production, climate mitigation, economy, and future, as well as the forested Santa Fe National Forest (SFNF) we depend on for these things.

We need serious discussions on alternatives to this Plan, in all of its aspects. Due to delay in USFS getting copies of relevant documents to me, I have had only 15 days to review these issues, and this set of Objections and Solutions is in not complete. While I can indeed offer concrete alternatives, including a more general approach to forest planning that would be more appropriate for our climate change challenges, I was unable to incorporate these and their scientific references and contacts into this document.

Please accept these comments in the spirit in which they are intended: I am serious in my efforts to work with you in a collaborative fashion to create a sustainable and vibrant future for Northern New Mexico's forests. Only in doing this can I assure a best future – and present- for my constituents.

Please read my two previous letters (attached) to you on these issues for confirmation that my previous comments are related to these comments (see attached). I reserve the right to comment on events, issues and concerns that not only relate to this plan but to the current status of forest, its risk and endangerment by you, and all additional events relevant to these critical matters, including the Hermit's Peak & Calf Canyon Fires (HPF/CCF). The implied and indeed predicted dangers of prescribed burning came true here on April 14, 2022, and have destroyed the east side of the Sangre de Cristos; surely these recent matters are the crux of our discussion?

Your restrictions on the commenting process are unnecessary, now that we are only 8 Objectors out of 11,000 who disagreed with you plans for this forest. That is seven percent of one percent! Your instructions for these comments show that USFS blocks and constrains everything from even those

eight people. Yet clearly are objections are meritorious – please consider *conversations* with us as well as hearings.

Because your imposition of unreasonable guidelines and limitations on critical commentary make a mockery of the communication USFS is supposed to engage in, in good faith, in order to understand the very real and meaningful objections we bring, that apparently you did **not** consider. We also speak for thousands of others with similar concerns. Please consider that your framing and assumptions and inertia on Forest actions may have blinded you to larger concerns, and listen to these voices from outside your echo chamber.

Given that two of the objectors all but predicted the Hermit’s Peak/Calf Canyon Fires, perhaps you should trust our words more than those whose judgement fired up our biggest, most expensive fire on our most treasured forest through a series of comical and deadly mistakes.

Even I, as an elected official, have been hindered, rather than assisted, in this opportunity to review the critical situation we find ourselves, wherein the SFNF FS has changed little in their plans, and has not at all adequately, or in any way publicly, refuted our objections. Further, after a public hearing in which I requested to Supervisor James Duran that USFS provide SFC Commission with 10 copies for our review, rather than facilitate this, your personnel did not know what documents were under review, and my repeated requests were ignored. Thirty days later (30+) – two-thirds of the way through the review period- they were supplied. I did not even have enough time to send an official letter asking for a delay in order to incorporate my full response here.

This is no way to treat a cooperating partner in an agency agreement – or anyone, especially as the review period should be 90 days at least, **and I hereby request that in the future such periods be at least 90 days.**

In my previous letters to you (attached) I raise many issues you will see again here, but many I have not time to address. Please review them for the overview that you are missing; even the jovial time frame of this document: “short term (1-6years) adverse effects” ignores that window’s criticality to the existence of SFNF’s ecosystems. Within the first 7 years of this Plan’s time frame, 2030, it is expected that rising temperatures – especially here in southwest mountain forests – will exert increasing effects, altering the altitudinal range of our trees and thus their ability to both survive and regenerate.

My first OBJECTION: You have not incorporated climate science in any way, except to promote succession of this forest to grass/rangeland in a time when we need all trees to keep carbon in the ground. I further object to your ignoring the Paris Agreement, as well as your own scientific data from RMRS scientist Mike Battaglia and others on ponderosa regeneration failure – please see your own special issue on this!

The forest is stressed from years of drought – your “negative” (removal) forest treatments are stressing a forest at its tipping point **for regeneration failure**. That is apparently a **proven** point, according to your own scientists at Rocky Mountain Research Station. A special bulletin called “Resilience Test: Can Ponderosa Pine Bounce Back after High-Severity Fire?” documented USFS and other scientists are already widely seeing such the death of ponderosa and other forest through enhanced mortality and failure of trees to regenerate – resulting in transition to

grassland/rangeland/shrubland.¹ This is exactly the path USFS is choosing to take with the SFMLRP, and which Objectors have pointed out to USFS repeatedly; but the Objectors meeting in 2022 made clear that USFS in the SFNF chain were unaware of this possibility.

Thus my next OBJECTIONS: First, I object that your plan will kill most if not all the trees in the forest, especially ponderosa, as a direct result of your multi-stressor negative “restoration” treatment plan. Please examine and desist in this at once. The only thing your plan restores is forest “structure” that assists grazing at the expense of trees that we need. I further object to that on the basis of survival of my constituents, the ability to live and thrive here for all of Northern New Mexico’s inhabitants and their descendants. You directly interfere with the water production capacity of the SFNF by your taking- cutting, burning, thinning- - the trees that produce the water we drink, here. Deforestation whether through thinning or cutting or burning has the same result: it will change not just the SFNF but our entire region, as it dries out from the inside and depletes all local sources. What are estimates of capacity loss due to HPF/CCF?

The SOLUTION to this is to 1. Reduce fire risk in other ways 2. Restore forest ecosystems by building them with positive treatments, or at least not stressing them to death. A real solution would be a multi-pronged, systemic approach utilizing all the tools available, including positive treatments that support soil ecosystems, forest ecosystems, riverine ecosystems, on the Santa Fe National Forest. We need to have a conversation about alternatives. Contact me for further connections and details.

USFS Mission:

The mission of the USDA Forest Service is to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations.²

I would like to frame my objections to you with the following irrefutable facts – please consider the following objections through the lens of these facts.

1. NNM has very little water to fight any fire. We have lost billions of gallons of water– entire town water supplies – to Forest Service use of what little water we have, being used to fight HPF/CCF. Even this has damaged the area for decades, if not centuries.
2. According to the Paris Agreement, we must stop deforestation – not only as a regulation but because it makes our problem worse through a triple whammy
 - generates more carbon
 - destroys carbon sequestration of living and older trees at highest capacities
 - actively diminishes the water production capacity of the forest, used to fight fires.

We cannot afford any of these losses, yet you do not count them!

¹ Forest Service Rocky Mountain Research Station. **Resilience Test: Can ponderosa pine bounce back after High-Severity Fire?** Science You Can Use Bulletin September/October 2021 | Issue 50, p. 1-11

² <https://www.federalregister.gov/agencies/forest-service#:~:text=The%20mission%20of%20the%20USDA,of%20present%20and%20future%20generations.>

I therefore register this OBJECTION: you have not correctly **measured** what you are destroying, neither in hydrogeographical capacity nor carbon desequestration, nor a myriad of other critical ecological capacities we have yet to accurately measure. This must be at least examined in the light of climate science, and you have certainly not incorporated it. You are actively deforesting these mountains, apparently mostly around here for cattle grazing!

A more modern, current science incorporating ecological network understandings, climate science, one reaching out to the already current rehabilitative power of regenerative ecology and agroforestry, is critical to assisting our forest ecosystems to survive.

You have addressed the problem of risk in our forests in the cheapest, riskiest, and least discerning way, but are not accepting the reality then, that such an approach cannot work where extreme care is needed, or when the potential costs are so high as to negate the approach itself. Your own risk assessment matrices agree with me, but not with your actions in burning on the SFNF in late spring, for instance. All fire is not bad, obviously, but the wisdom of using fire in a drought-ridden, stressed forest, with no water, is.

My OBJECTION is thus that you have not delimited the boundaries of where and when you will NOT use prescribed fire, or logging and thinning, based on ecological responses to your previous efforts. And certainly not in response to an understanding of climate change.

Solutions and requirements for solutions

Here is the text from the Resolution that Santa Fe County passed on July 19,2022. It makes explicit our requests for cooperation and collaboration to the USFS. These have not yet been seriously addressed, and I ask that you address them.

NOW THEREFORE, BE IT RESOLVED, that the Board of County Commissioners of Santa Fe County hereby:

1. Encourages the Forest Service to prepare a comprehensive EIS for the Project that would in every respect engage the public, respond to a full and fair discussion of significant environmental impacts, examine alternatives, including preserving forests in their natural condition, and document unavoidable adverse effects prior to commencing any action.
2. Urges the Forest Service to investigate and disclose tactical and strategic alternatives to large-scale fuel reductions, both to restore the forest and to address wildfire risk. Specifically we request that additional experts in regenerative agroforestry, indigenous and historical approaches be consulted, with public access to presentations, and that additional community-based approaches be sought through public meetings.
3. Requests that the USFS use an EIS or additional tools, agencies, or monies to investigate, analyze and disclose to the public, the risks of an escaped intentional burn, specifically under pervasive conditions of drought and climate-change conditions, in comparison to alternative approaches and plans.
4. Requests the USFS use an EIS and additional tools to assess the impacts of USFS forest fuels' treatments on the ecosystems comprising the Santa Fe National Forest combined projects, including catastrophic loss of tree regeneration and ecosystem integrity, and their explicit risk to New Mexico citizens, water supplies, and economies.

5. Requests the USFS cease all prescribed burns on the Santa Fe Mountains Landscape Resiliency Project area until the greater understanding and concomitant risk reduction they provide can insure is in place. Specifically address climate change impacts on New Mexico forests, on when forests die offs are expected (not if), and what the USFS is doing about it? How is your clearing thousands of acres by macerator or by fire, not fall under the deforestation that the IPCC and the world are condemning?

You pretend you do not even need an environmental impact statement when you need a complete reassessment of your procedures, your personnel, and your misguided goals.

If you do not have a Forest or management plan that addresses the mitigation of climate change onto these forest and river ecosystems, onto all the ecosystems of the Santa Fe National Forest (and of course others) – then the Forest Service is already sorely late in its mission:

...to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations³.

Why then, is this next Forest Plan, 35 years later, not planning how to mitigate the impacts of worsening climate change, not planning to aid or manage forest succession, not planning for the regeneration failure of our forests under increasing temperatures?

No, it plans instead for better grazing allotments, while ignoring larger issues that are its responsibility.

Santa Fe County has been affected in every arena by the massive destruction of the fire and its rescue by the USFS. From water resources and the excessive hydro geographical damage wrought on the forest by its saving, through destroyed historical fields and the massive destruction of trees which formerly buffered temperature and winds, the loss of these regional resources impacts all of our local decisions on land and water.

How will the massive HPF/CCF burn scars, opening of canopy, and destruction of forest structure in the eastern part of the SFNF, affect the west side of the SFNF, an engine of NNM's growth from Pojoaque to the south side of Santa Fe county?

I therefore OBJECT to your lack of relevant data on your actions and their impacts on this forest, surrounding communities, ecological resources, and the economy, which are necessary for you to be

-evaluating risk

-evaluating cost

-evaluating impacts.

No serious and responsible entity would proceed given such a lack of understanding on proven risks and dangers, not only to the endeavor, but to the community, to the northern New Mexico region, to the New Mexico state economy, of which this area is a mainstay.

We – whose risk goes uncounted - cannot afford any more such “projects” by the USFS. Please note that what the Santa Fe County Resolution requested, is what you need to study to evaluate these larger issues. But you are working from far too little real, current, data.

³ <https://www.federalregister.gov/agencies/forest-service#:~:text=The%20mission%20of%20the%20USDA,of%20present%20and%20future%20generations.>

Objection and Request: I object to the incompetence, ignorance, misplaced enthusiasm— whichever is responsible – that must have been involved in the Hermit’s Peak & Calf Canyon Fires. The seriousness, cost, and easy replication of the Hermit’s Peak Fire/Calf Canyon Fire disaster demands an **outside investigation into HPF/CCF**, including the errors, training, personnel, judgement of the decision-making chain, reasons why multiple safety measures failed (list: checklist, personnel, communications, vetting of fuel models, location for test, use of weather data (or non-use) and why others must be instituted (to refrain from killing ecosystems, from deforesting including thinning, burning, cutting, etc, mandated seed-keeping, assisted migration). WHO was responsible? Why is this information about what constituted a federal crime, being kept secret? Has any law enforcement investigated the possibility that people who were not USFS were lighting fires on the forest that day? Indeed, who was pressuring those on the mountain to initiate this fire? Until we know these things, we cannot be trusting of Forest Service process or safety in this regard.

These fires raise basic questions about the competence and knowledge of the personnel setting these fires. Yet additional training in FIRE is not all that is needed! Understanding of the ecology, specific ecosystems, and abiotic patterns involved (weather, climate, hydrogeography at least) is needed to understand what is being endangered. To not know that you are burning up the only habitat for Spotted Owls because you aren’t can’t spot it, or that the lack of snowpack was unprecedented the spring of the Hermit’s Peak megafire, is to be unprepared for the situation or its consequences.

We saw what that lack of preparation looked like throughout every single aspect of the bungling that preceded the setting of Hermit’s Peak Fire, and escaped pile fire at Calf Canyon. Some of this may be the result of the conveyor belt approach to personnel through the SFNF, with ecologists, other experts, and forest managers moved as often as 6 months. One forest ranger I asked said this was so they wouldn’t get “attached to the forest”. Meaning – that they would care about it!

But most rapidly-circulated personnel are disconnected from accumulated and institutional knowledge and understanding of the place. The very fact that FS personnel were willing to set hundreds of drip lit fires in erratic high winds in a dry forest— or their associated Fireshed partners who remain unnamed and irresponsible: who are they, how are they trained in ecology and maintenance, or are ONLY fire experts allowed on our forests? Those present either had NO IDEA of ongoing conditions of this forest, or were willing to ignore real conditions that would have prevented prescribed burning.

That the Forest Service consider burning more of this Forest when you have NOT corrected your procedures or brought in experts to re-evaluate your problematic approach, even with a multi-Billion-dollar megafire set by your incompetence or ignorance or pyromania?
The Hermit’s Peak Fire was unconscionable, and ***apparently due to pressure from inside the Forest Service or its partners!***

But not only do we NOT know who set the fires, against the concerns of locals, nor who continued to set fire after the fire was known to be escaped. According to the public report, we do not know who in charge decided this was acceptable and not dangerous, especially in then-current conditions of no snowpack, severe drought, and ongoing climate change impacts. Supervisor Debbie Kress was moved so she didn’t have to answer any questions!

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505-995-2740 www.santafecountynm.gov

Who did the pressuring, and who was pressured?

My next formal SOLUTION:

Stop your explicit strategy to push more prescribed fire in towards the WUI, homes and communities. This alone will temper some fear of the USFS destroying our communities.

Prescribed fire close to communities is not desired, nor is it safe under current climate conditions, but more importantly, it is NOT safe under whatever leadership, training, education, skills and judgement **produced** our recent megafire. Even your tools, from risk management to fuel models (given how easy it was to choose and justify incorrect ones) are now in question: they require review as to incorporation of science from this century, the 21st, given that the science used by USFS barely mentions climate, much less takes it seriously.

As a concrete example, your metrics for determining impacts and safety around fire are outdated. They have been replaced with more sophisticated metrics such as vapor pressure deficit, soil moisture and soil maximum temperature that better predict high mortality to trees and how dangerous fire is due to dry soil, air, vegetation conditions. That you have not incorporated this science yet is an indicator of how behind in scientific research, the USFS is. So please -work with communities, including our local scientists who are current; have meetings with them that are not formally structured to only your purpose. Stop dismissing our concerns.

Nothing has changed since the Hermit's Peak Fire Report⁴; how can we trust Forest Service techniques, as well as the judgement of personnel? I do not distrust science, as it is clear not much science was included here, or we would be discussing the merits of assisted migration for our trees rather than why not to cut and burn them.

Yet because NO attribution to people was given here, we do not know their status, training, or affiliation. Do we even know if they ARE USFS people? Where is the report on personnel? – which personnel uncouncted on an unchecked checklist, and by whom, we don't know. Chief Moore's report states who exactly was there was unknown; that means it could have been anybody. Are fire-happy pyromaniacs filling the ranks? The report states there was a cadre of unidentified people who kept lighting fires way after the order to stop doing so was given.

SOLUTION: The USFS needs an upgrade in judgement. Meaning understanding, education, context, ecological training sufficient to not call pinyon-juniper “trash trees” or joke about incinerating the entire forest. Or not make a dozen mistakes in judgement, execution, even protocol, when starting fires on our high, dry mountains. Or complete risk checklists.

Regardless of anything else, the execution of the Hermit's Peak prescribed burn showed failure of judgement up and down the chain of command.

- whoever OK'd the day despite red flag weather on the mountain
- whoever allowed people on the mountain to fire it up without knowing who was there
- whoever proceeded with the prescribed fire after it had escaped. That is – they noted it had escaped, had not quite stopped it, thought they were going to, and proceeded drip lighting in erratic winds.

⁴ <https://docs.house.gov/meetings/II/II10/20220623/114957/HHRG-117-II10-20220623-SD456456.pdf>

We literally CANNOT safely entrust our people, communities, and future to such execrable judgement that the USFS has shown on the Santa Fe National Forest. Nor the derision with which they are treating citizens and their partners by trying to pretend away a multi-faceted, cultural, educational, and capacity issue.

If the USFS cannot find people with the judgement to prevent a 10-tiered mistake from happening that costs billions of dollars, they cannot be in charge of such projects.

I thus OBJECT to the clearly inadequate risk assessment the USFS is doing. USFS default assumptions about the receiving side of risk – surrounding forest, communities, water resources, etc.- may be applicable if what is at risk is just another patch of 1000 acres of USFS land. But this forest is adjacent to many billions of dollars of real estate, and that would be a direct cost. Indirect costs to the community and economy would be far far more.

SOLUTION: You can find better risk assessment methods – your own! Published in Treesearch or your own bulletins as well as current scientific literature, you can apply risk assessment and risk management analysis that addresses all components, hazards, and impacts of risk; these would finally address community risk on many levels.

In lieu of using risky methods where fire is truly required, USFS should consider the use of real Indigenous fire: small-acreage burns of 1-5 acres, attendant to local ecology and careful in what burned. Indigenous people also do not start with dried underbrush in a dry time, did not typically burn trees unless it was for a specific purpose. Comparison of any USFS fire to Indigenous fire is unwarranted and misleading.

SOLUTION: On behalf of federal, state and county commitments, I request a review of the agenda behind this plan which optimizes grazing allotments while removing much of the trees that constitute actual forest. This is a terrible bargain in terms of all costs and benefits. Our priorities, the literal climate, and the costs and benefits of the situation and, more broadly, your strategy, have all significantly changed. If your own RMRS scientists are warning you of regeneration issues with ponderosa and other species, you must cease considering these trees as incidental to your grazing and timber contracts, and attend to the ecology of the SFNF.

Why? Because this current plan, the SFMLRP, still completely ignores climate change impacts, thus underestimating the risks and costs of your entire project. And certainly it underestimates the costs to all of us who live here: in health, in water, in clean air rather than your possibly radioactive particulates. Forest Service risks and costs are too high for the project it plans, and as you are equally likely to generate another megafire given the lack of accountability for the last one in HPF/CCF, the predictable risks using real risk management are far too high.

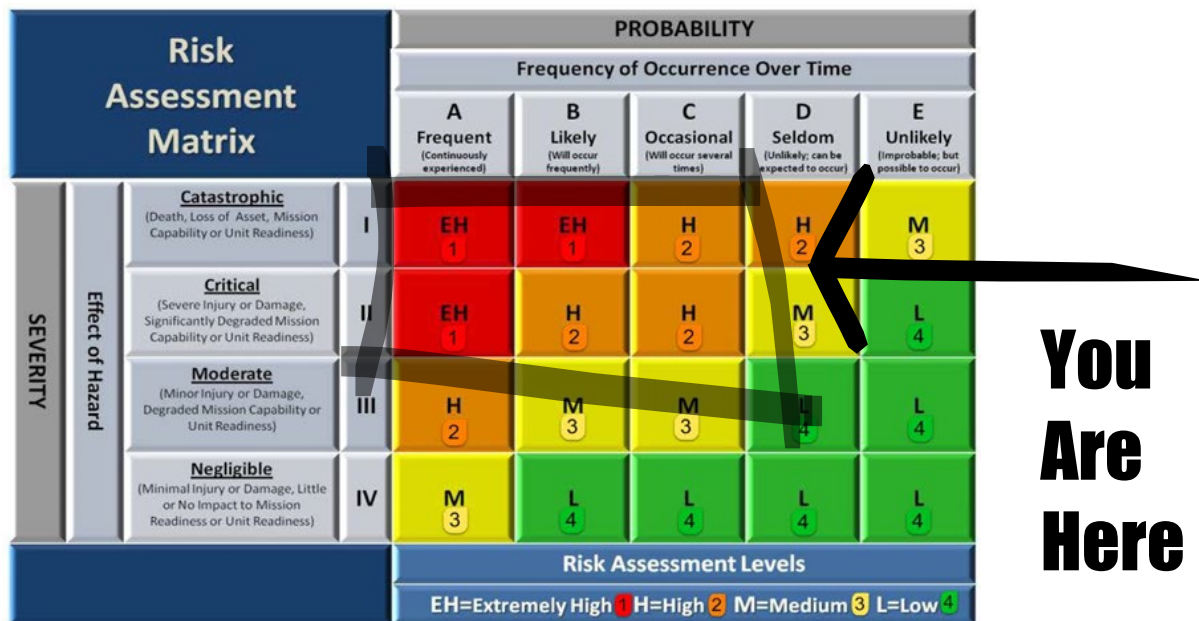
SOLUTION: Why engage in hearings over these issues rather than cooperation? Let's instead:

1. Honor existing cooperation agreements – USFS is not honoring ours when SFC officials request copies of the proposal under review, to the Forest Director in a public meeting – and they take 30 + days, and multiple confused interactions with the Forest Service, to deliver them. Unacceptable – and it derails efforts to truly cooperate on this issue.

2. I propose a new, multi-jurisdiction review – across federal, state, county, and city. It is time for serious review of what our ecological assets are, before they disappear during climate change. Simply the effects of the HPF/CCF on water resources in the entire forest must be considered; our window to ameliorate their degradation rather than mourn their loss, is closing fast.
3. We need faster-response science. We are a science-rich state, let's help design whatever the vision for the future can best be through collaboration with science. Meetings with scientists who have successfully contested FS assertions, and have pointed out current science ignored by USFS, deserve scientific consultations.
4. Lastly, I propose that it be determined with a multi-department, multi-level governmental analysis, including multiple climate change analysts that have so far been *completely absent* from the discussion, whether SFNF, in part or in whole, can be designated as a Climate Reserve or other protected lands that can be administered for afforestation and enhanced water capacity, in order to serve this region for longer than 10 years.
5. The USFS needs to do a Greenhouse Gas Inventory of the forest and the SFMLRP – let us at SFC know how we can help.

Lastly, I again ask that you take a serious look at risk, not just the minimal tools you are using now: your own agency has published articles you aren't using. I leave you with a basic message of your own risk management: the cost in your own terms is catastrophic for another of these escaped fires of yours – according to your risk matrix, you cannot do them.

You, the USFS, we, the community, and the forest ecosystems themselves are here in the critical risky section. Let's not blow it again by repeating clear mistakes, shall we?



It's time we join forces to optimize use of the Forest for the needs of the future, while diminishing the risks and dangers for us all.

Respectfully,

A handwritten signature in cursive script that reads "Anna Hansen".

Anna Hansen, Santa Fe County Commissioner, District 2, my comments are from me as a commissioner, but do include items from our resolution that was passed by the entire BCC.
Chairwomen of the Board of County Commissioner
President of Northern Rio Grande National Heritage Area
Chair of the Coalition of Sustainable Communities of New Mexico

Attachments:

Letter to Supervisor James Melonas
Letter to Supervisor Debbie Kress
Santa Fe County Resolution 2022-50