

## Comments regarding the North Sandia Fuel Reduction Project

Unquestionably, the North Sandia forest is in critical need of fuel reduction. The USFS is to be commended for addressing this issue. As a resident of Placitas and owner of property at the base of Las Huertas Canyon, I appreciate the opportunity to express comments about fuel reduction activities in this area to ensure that the safety of the forest, wildlife, human life, and surrounding communities and property are prioritized.

The primary concern I have is the use of prescribed burning, even after multiple fuel reduction measures have taken place. I do not pretend to be an expert on this topic, but am hopeful that the USFS takes the following concerns into serious consideration.

The possibility of a prescribed burn becoming uncontrollable in any fuel reduction project is exacerbated in the North Sandia area by steep canyon walls, unpredictable winds, and thick underbrush. USFS representatives at the meeting in Placitas discussed implementing a strict go/no-go plan for any prescribed burning. Although a go/no-go burn plan would be based on 'best practices', such plans are clearly far from perfect, as we have seen from other prescribed burns that have become unmanageable because of unforeseen circumstances and circumstances beyond human control.

Above all, the risks involved in the situation of an escaped prescribed burn in this area would seem to far outweigh the benefits of any use of prescribed burn measures (which are really nothing more than a cost savings). The risks of a prescribed burn becoming uncontrollable in this specific area, including loss of life (human and wildlife), property damage, forest damage, loss of wildlife habitat, and flooding, together with the high costs of fire-fighting measures, flood mitigation, property reparations, and forest rehabilitation, are just too great to consider implementing any type of burning measures.

In addition to the example of the 2022 Calf Canyon/Hermits Peak fires, the Coconino National Forest experienced a devastating forest fire, presumably caused by a spark from a USFS contractor's equipment in a fuel reduction project, which resulted in a huge barren forest landscape, massive flooding which also resulted in the loss of human life, expensive and unsightly flood control measures, and a city filled with sandbags that have been laying stacked and rotting in residents' yards for years. (Granted, this was not the result of prescribed burning, but clearly illustrates the inability of the USFS to foresee many of the risks involved in any fuel reduction program.)

Which also brings up the issue of unqualified residents performing any fuel reduction activities, which was brought up and discussed at the meeting. While community involvement is important in the overall plan for fuel reduction in this area, I believe any such unsupervised activities, with or without training, should be strictly prohibited by the USFS.

In addition to a plan for fuel reduction, preventive measures are just as vital. I would like to know if the Forest Service has a plan in place to impose and enforce strict preventive measures in this area? Are there plans to close the forest to hikers, bikers, and vehicles when the fire danger is high? Are there plans to restrict campfires and barbeque grills in the forest during the dry season? Is there a cooperative plan with Sandoval County to restrict the use of backyard fire pits and charcoal grills during extremely dry conditions? Are there enforcement policies such as fines for violations of these measures? (Obviously, there is still the risk of lightning caused fires; however, the vast majority of forest fires are human caused.) Such fire prevention measures have been utilized in the Coconino National Forest and in cooperation with Coconino County and have been crucial in the overall scope of forest management and in addressing wildfire risk. It seems that the implementation of strict prevention measures in the North Sandia area would greatly reduce the risk of wildfires in the absence of fuel reduction plans that have yet to be implemented.

Thank you for your thoughtful consideration of these concerns.