

Comments for USFS Concerning Proposed North Sandia Fuels Reduction #65654

Note: These comments are for the Placitas area and do not address any issues in the “East Mountain” area or Albuquerque or surrounding communities.

I. Background.

I have owned a home and lived in Placitas, NM for almost 25 years. I have had concerns about a HUGE fire in Placitas since shortly after moving here.

The first notice I received of the Proposed Fuel Reduction in Las Huertas Canyon (“Burn”) by the USFS was on Monday, April 22. The meeting was scheduled for Wednesday, April 24 at 7 PM in the Placitas library. I received notice in the form of a very basic email from a neighbor. When I arrived early for the meeting, the library designated parking area was very crowded and some people were parking on the mostly minimally maintained and rough shoulder of NM route 165. Some people may have been dissuaded from attending due to the limited remaining parking. I estimate that there were 100 people in the main room, and there were an unknown number of people in an overflow room. There were multiple Placitas area neighborhood organizations represented with a combined total of about 20 people from these organizations present. There were two victims from the 2022 Calf Canyon / Hermits Peak fire. There were several representatives of the Sandoval County Fire Department (who were standing in the back), about 5 to 10 USFS personnel and a few others who seemed to be from governmental agencies, but I am uncertain of which.

Of the Placitas residents present, the general feeling I had was that everyone was to a variable degree opposed to the proposed Burn. I think that many people had an emotional feeling of fear at the thought of a Burn. Part of this might have been that many appeared to think the Burn had already been scheduled for the immediate future, such as June or July of this year. Fears were somewhat allayed by USFS clarifying that the proposed Burn was in a very preliminary study stage. Placitas residents seemed opposed to a burn even if it was in the more distant future. Even after the study is completed there are more steps before any actual Burn would take place. Comments from the audience that were each repeatedly mentioned were 1) Notice to the residents of Placitas was almost surely not to all residents 2) Sufficient time was not allowed from receipt of notice of the meeting to the meeting time 3) The deadline for submission of comments was inadequate and 4) The meeting room was too small to accommodate attendees. Additionally, I think the map slides were inadequate in that I could not understand the maps shown as there were no clear landmarks or legend (this is from a person who is familiar with maps, and has many maps and can consult them and understand them both online and on paper). I did not get a paper handout with a post office address, phone number and email address to send / speak comments. I received

an email comment address, but it was not from an official source, so it is possible that there was data corruption from an unknown number of intermediaries.

II. Comments regarding administrative and procedural issues.

1. The April 24th meeting should be considered a very preliminary meeting. Another meeting should be scheduled at a larger venue. I have never been there, but possibly the Bernalillo High School Auditorium would be a better choice. Maybe a video connection should be made to the Placitas Library for those who choose to remain locally.

2. This future meeting should be more extensively advertised. I would propose a mailing to the entire Placitas community as well as postings at public gathering spots both in Placitas and Bernalillo. The mailing should include not only individuals, but also businesses, churches, schools and governmental agencies. Perhaps any mailing should be by certified mail as is required for zoning issues in New Mexico. After all, an escaped “Controlled Burn” which has a potential to burn down my house is more important to me than a zoning change which changes the view outside my front door. Should any Burn be actually be scheduled, an approximate date should be provided to residents using similar means.

3. The initial comment period should either be extended substantially (This was done, Thanks) and a new comment period be established after the future meeting.

4. Paper color maps of the studies done to this point should be printed for distribution at the future meeting. These same maps should be made available online. Perhaps larger copies such as a poster size for wall hanging should be available in the libraries. Updated maps should be provided as they become available.

5. A list of relevant contacts should be made. This should include names and phone numbers for not only the USFS but relevant local agencies such as the Sandoval County Fire Department, Sandoval County Sheriff, Bernalillo Police Department, Sandoval County Emergency Services and any other relevant agencies such as those from the State of New Mexico.

6. The Martha Liebert Public Library in Bernalillo and Placitas Library should have all relevant documents on file for those who might lose them, are new to the area, or don't have internet access.

III. Comments regarding the proposed Burn.

1. According to census.gov the population of Placitas was 5,041 in 2020. Of this total population, 41.6% were over 65 years of age and 5.3% were under 18. Nearly half

(46.9%) are at higher risk than the average adult in needing help in the event of an evacuation caused by a Burn that escapes confinement. According to the same census, there were 2,015 households. For the basis of the following calculation, I am going to assume that 1 household = 1 house. Houses with more than one adult commonly have more than one motor vehicle. As far as I know there are no apartment buildings in Placitas, very few town homes, and that every household has a house as there are either no unhoused people, or very few unhoused people. 2.7% (about 1 in 40) of people did not have an internet connection. According to a mailing by a local real estate agent, the average sales price for the 91 houses sold in Placitas in 2023 was \$693,930. The main access road to Placitas is NM Route 165. It rises from a low point at Interstate 25 to the Cibola NF entrance at the end of NM 165. Along the length of this road, the terrain changes from grassland / scattered Junipers to more and more trees with Pinions and Junipers. I am not a forestry expert, but given the widely reported intense burning of the predominant trees in the terrain, and making a scientific wild ass guess (SWAG) from roughly milepost 3.5 to the end of the road will burn given an escaped Burn higher up in Las Huertas canyon. About half the houses in Placitas would burn in such a situation. Very Rough Calculation: 2,015 houses x $\frac{1}{2}$ of the houses burn x \$700,000 per house burned (by the time of the Burn sometime in the future) = (very approximately) \$700,000,000 in houses destroyed. Of course the land would still be there which is included in the sales price of a home, but the land would be devalued because of loss of cover, erosion, utilities, etc. and this calculation did not include the value of the contents of the house, burned vehicles, and pets and livestock. Then there could also be loss of human life which is hard to value. This calculation did not include the values for 2 churches, 1 post office, 1 elementary school or multiple businesses (of which there are 117 according to the census, but it is not clear if these are all in Placitas or only a mailing address). My very rough estimation of the total damages sustained in Placitas by an escaped burn would be in the range of 1 billion US dollars.

2. A survey of people requiring assistance in the event of an escaped Burn should be made. This would include blind and / or deaf, the very elderly, those unable to drive, those with no motor vehicle transport, people with amputations, users of wheelchairs, chronic respiratory illnesses, those very infirm, or other disabilities, unhoused people (possibly 0 unhoused currently). Perhaps these people should be evacuated in advance of the Burn as this would lower the burden on emergency responders should this become a need.

3. Perhaps people with livestock or many pets should evacuate them in advance of a Burn as it is likely the livestock could not be evacuated in the event of an escaped Burn and it might be hard to round up many pets in an emergency.

4. Rules for citizen removal of dead or downed wood from the proposed Burn should be reevaluated. Perhaps hold a class to instruct in ecologically safe, physically safe and

allowed removal of downed wood, dead wood, and maybe even some living trees and issue a license. Perhaps mark areas needing the most attention from the public.

5. Consider the merit of manual removal of ALL of the excess wood and vegetation. Sure, that would cost millions. Compare that to the cost of the US government making Placitas whole in the event of a major fire, which would include buildings, contents, lowered land values, temporary housing, lost time at work, loss of business, compensation for injuries and death and confidence in the US government.

6. Given that the combustibles are not only in the NF, but wide spread on private land education and assistance to residents should be provided to encourage / enable removal of excess combustibles on private land. Dumpsters, masticators, access to chainsaws (with safety instructions), manual pruners, etc. should be provided. Regulations to designate areas for roadside piles of vegetation should be permitted considered and arrangement for pick up by the county, state or US government.

7. Native American Tribes (Santa Ana, San Felipe, Sandia, and possibly others further afield depending on how nervous one is about an adverse outcome) and all relevant agencies and businesses (at the very least Sandoval County Fire Department, Sandoval County Sheriff, Town of Bernalillo Police Department, Sandoval County Emergency Services, State of New Mexico (multiple agencies, but I don't know which) ambulances, hospitals) should be ready for foreseeable adverse events and hold drills before any Burn in case the Burn escapes confinement.

8. Currently there are very limited routes of egress from Placitas. There is NM Route 165, which is a well maintained two lane road starting at I25 and proceeding to the National Forest. There are also two winding and confusing streets that branch off of NM 165 around mile post 2 and proceed down to the I25 Frontage Road. These two residential streets should be clearly marked for easy egress if needed in an emergency. By my estimation, 30 vehicles per minute can pass a given point at a safe separation of one vehicle every two seconds. This would be 1800 cars per hour, which would be most of Placitas if each household evacuated in only one vehicle. But as noted, households with more than one adult commonly have more than one car, so maybe there would be 4,000 cars, so a complete evacuation of Placitas along NM 165 might take several hours if everything went well. Some fires spread very fast (example: Talent, Phoenix, others, in Oregon 2020, Lahaina, HI 2023, Louisville and Superior, Boulder County, CO, 2021, Camp Fire, CA, 2018). This possible evacuation time does not take into account slow moving over loaded vehicles, breakdowns, crashes, screaming matches, fist, knife or gun fights, blocked road due to smoke, fire, gear falling off of trucks, blockages from firefighting equipment, etc. It should be noted that one of the causes of death in the Lahaina, Maui fire of August 2023 was a single escape route with the other road out of town blocked by fire.

9. Further up NM 165 when the dirt road starts, it is basically non passable to most vehicles due to the lack of upkeep. Even if the road is repaired, this would not be a good escape route as the route goes right through the area which would be burning. However, if road was repaired and upgraded a bit this road would support individual citizens and crews removing downed or dead wood, excess living vegetation, masticators, dump trucks and etc. It would also support crews if a Burn was conducted, and most importantly allow easier access to fire fighters if the Burn escaped confinement. I have been told this is a State of New Mexico road. I have been told that there is great inertia for changes or improvements on the part of the State such as improving this road. To this I reply: the State should “get the lead out” and “Make It So”. A Burn should not be conducted under any circumstances with the dirt portion of NM 165 in its current condition.

10. There are some foot trails out of Placitas going South into the Sandia Mountains. These are not a realistic escape route in my mind due to the rugged terrain and steep climbs involved. However, these should be evaluated by a professional and improved should a foot evacuation be an absolute need.

11. There are several possible escape routes north of Placitas. These mostly depend on passing through the San Felipe Pueblo Reservation. The reservation boundary may be fenced. Several of these routes would involve driving or walking down a dry wash (if it was running, there would almost surely not be an escaped Burn). In a desperate situation, this might suddenly seem better than burning alive. This should be evaluated by a professional. San Felipe Pueblo should be contacted and appropriate arrangements made.

12. There is an east/west oriented power line which goes through or near the Placitas Open Space. There is a trail of some sort along this power line. This might be made passable for cars.

13. Hagon Road starts in San Felipe and ends near or at an electrical substation North East of Placitas. I have been told Hagon Road some how might connect to the Diamond Tail subdivision. This might be a more realistic escape route for some people in the Northern and Eastern portions of Placitas. This should be evaluated. I have been told the road is currently closed off by San Felipe Pueblo due to a remote history of criminal activity, but should be temporarily opened for an event of possible great import such as the Burn, again by consultation with San Felipe Pueblo.

14. There is a pipeline road or trail that starts near the letter “T” of the word Las Huertas subdivision as shown on the Open Street Maps map of Placitas at magnification level 17. The satellite view of this does not show it to be obviously passable to cars, but

it might be upgradeable. I think this would likely be passable on foot judging from the aerial maps I have seen. Markings would be needed. This road / trail goes through to NM Route 14 on the East side of Sandia Mountain.

15. Government needs to become more responsive to citizens regarding the above issues. I have met a stone wall. Details available on request.

16. PNM, the local electrical utility, used to sponsor a recycling center near to I25 just off the North side of NM 165. It has not been used for this purpose for several years. The physical structure remains. This could be useful as a drop off site for dead wood, downed wood, cleared living trees, mastication, etc. I don't know the reasoning for PNM setting up the recycling center years ago, but I presume it was a tax deduction in some form. I think they would be happy to have their tax deduction return.

17. Perhaps the Sandoval County Landfill could be persuaded to allow free dumping of cleared combustibles from Placitas.

18. The Placitas Library might be willing to loan pruning clippers, pruning saws and maybe even electric chainsaws with protective gear.

19. Perhaps much of what the USFS envisions for reduction of combustibles could be achieved through use of logging equipment. Maybe that would be more expensive than a "controlled" Burn, but might be cheaper in the long run considering costs associated with the possibility of an escaped Burn.

Conclusions.

1. If nothing is done with respect to accumulated combustibles, I think it is pretty obvious that Placitas is a conflagration waiting to happen on the basis of the large amount of combustibles in the NF and possibly also for reason of a large amount of fuel on private land. All of this needs to be cleaned up manually if possible in my mind.

2. I am hesitant to have a so called "Controlled Burn" anywhere near Placitas, given the history of controlled burns that turned into oopsies and major conflagrations: Cerro Grande in 2000, Calf Canyon / Hermits Peak in 2022 and others. If a Burn is to be done, maximum advance detailed and thoughtful preparedness with local resident input is advised.