

Encino Vista Landscape Restoration Project (EVLRP) #54695
Objection to Final EA and draft DN/FONSI

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Reviewing Officer:

Michiko Martin
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Dear Michiko Martin,

After careful review of the Final EA for the Encino Vista Landscape Restoration Project (EVLRP) #54695, proposed for the Santa Fe National Forest in the Coyote Ranger District, I continue to have great concern for significant impacts from this Project.

I respectfully submit the following Objections within the 45-day objection period, which remain unresolved from the comments I provided in response to the Draft EA, via letter dated April 6, 2024 addressed to Mark Sando, District Ranger, Coyote Ranger District, Santa Fe National Forest.

I object to the Finding of No Significant Impact (FONSI) for the Encino Vista Landscape Restoration Project. There is in fact significant and intense impact posed to the area of Canones canyon and the watershed of Canones Creek (an Impaired Function and Eligible Wild River) by the proposed prescribed burn treatments. The evidence and analysis of the Final EA are not adequate to understand or assess the significance of these impacts.

It is my opinion that while the current conditions in the Project area could be improved for wildfire resilience, this Project is not adequately planned for successful and safe prescribed burn treatments in such a remote, very large and highly variable area, or to minimize adverse impacts to the Canones Creek watershed.

Therefore, specific to the 76,000-acres of prescribed burn treatments for this project:

- **This Project is too large and broad.** This Project is proposed at 130,305 acres; Comparatively, the Santa Fe Mountains Landscape Resiliency Project (SFMLRP) #55088 of May 2023 in the Espanola Ranger District, had a planned area of 50,566 acres, in a much less remote location and with fewer unique and complicating features within the Project area. SUGGESTION: Final EA, Appendix E enlarged treatment maps (pages 5-9) each comprise sufficient area for their own distinct projects. Reducing the area of the overall Project would allow for improved analysis of expected conditions.

- **There is inadequate evidence and analysis provided by the Final EA to understand Project impacts.** Considering 40 CFR § 1508.27, factor (b) Intensity, (5) against the Final EA clearly reveals that possible effects on the human environment are highly uncertain or involve unique or unknown risks.

In the agency response to Draft EA Comments, the responsible official states that “Due to the size of the project area, it is not realistic to expect that all areas of the project can effectively be surveyed by FS Staff.” (Page 7)

If the Project area is admittedly too large to allow for adequate analysis, it should not be undertaken in its current form.

There is no specific data or modeling within the Project EA for the Canones watershed or canyon areas, which are topographically unique with features that alter wind and weather behavior compared to areas nearby. The EA seems to assume the entire Project area is homogeneous - it is certainly not. The most impaired watershed in the Project area, Cañones Creek, is not directly analyzed. Instead, the EA analysis includes only Coyote Creek as a proxy peak flow analysis for all others, while being smaller and less complex than Cañones Creek and with much less agricultural acreage and acequia systems dependent upon it. This is inadequate evidence and analysis to understand the impact of the proposed Project.

- **There is expected negative impact to Canones Creek water quality as a result of proposed treatments, but Project Design Features do not include appropriate mitigation actions.** The final Watershed Specialist Report acknowledges there will be negative impact to the water quality due to sedimentation (page 22). Table 4, on page 25 of the report, indicates that Canones Creek will experience the highest amount of sedimentation impact of any watershed in the EVLRP. This report further indicates that a slow pace of treatment implementation with opportunity for iterative recovery would help reduce this negative impact. However, the EVLRP Appendix C PDFs for categories “Wild River” or “Water” do not include this provision, contrary to the statements offered in the agency response to Draft EA comments.
- **There is not adequate available staffing to undertake this Project safely.** The response document to Draft EA comments indicates that the responsible official believes there are adequate resources, but no evidence or analysis is included to that effect in the Final EA. This Project is proposed for an incredibly remote location, with travel times of hours on rough roads and without communication coverage. This is a serious concern - whether there will be adequate resources to respond to any potential escaped prescribed fires in time to contain them.

Thank you for this opportunity to provide input and objection for consideration.

Sincerely,

