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Organization: The Forest Advocate

Title:

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Debbie Cress, Forest Supervisor

Santa Fe National Forest

11 Forest Lane

Santa Fe, NM 87508

Submitted via email

Re: the Santa Fe Mountains Landscape Resiliency Project environmental assessment

Dear Supervisor Cress,

The Forest Advocate is respectfully submitting the following comments concerning prescribed burn smoke and the health impacts on the public.

The Santa Fe Mountains Landscape Resiliency Project EA contains a proposal to apply prescribed fire to 38,000 acres of forest nearby Santa Fe, and then to periodically repeat the burns. This would greatly increase smoke pollution from prescribed burns in the Santa Fe area. Although we understand there may be some justification for very limited and occasional burning in targeted areas, the amount of burning proposed is many times too much given the severe health impacts current smoke levels are already having on many local area residents.. People are truly suffering, and the Forest Service has so far not seemed willing to even acknowledge it.

Dr. Erica Elliot sent you a letter dated February 21, 2021, describing the severe effects of prescribed burns on her patients. It is attached below. There are many people who are not patients of Dr. Elliot that have equally severe effects from prescribed burns smoke. There are also many others who are not suffering quite as intense effects from the smoke, but for whom the smoke still has a substantial negative impact on their lives.

It is not true that prescribed burns largely replace wildfires, or that if there are prescribed burns, the

amount and intensity of wildfire will decrease proportionately. Only about 1% of fuel treatments per year are encountered by wildfire, and fuel treatments are only effective for a window of about 10 years, so most prescribed burns are not preventing wildfire. The truth is that prescribed burns emit amounts of smoke that are largely in addition to the amounts of smoke emitted by wildfire. The large amounts of prescribed burning has made living in our area increasingly difficult to tolerate for many, and some people are contemplating moving in order to try to preserve their health. We are attaching below a SFMLRP draft EA comment that was just submitted today, from a woman named Peggy McCarthy who describes her suffering. We hope you will read it and understand how all-encompassing this is to her life.

We recommend that the Forest Service monitor health impacts from prescribed burn smoke on the public by systematically taking in prescribed burn smoke health impact reports. These could come from those affected, from their doctors, or from both. This would give the Forest Service feedback on when they are doing particularly excessive amounts of harm to the health of residents of the Santa Fe area.

It is not acceptable to simply rely on the Air Quality Index (AQI) to determine if the health of Santa Fe area residents are being impacted by prescribed burns. There are days when the AQI may be in the 51-100 range (officially considered acceptable except for sensitive individuals), and yet we can smell the smoke and see it. Moreover, people are often getting very ill at these levels. There was a study done at Harvard T.H. Chan School of Public Health in 2016 which found that death rates among people over 65 are higher in zip codes with more fine particulate air pollution (PM2.5) than in those with lower levels of PM2.5. PM2.5 is the most harmful component of wood smoke, including smoke from prescribed burns. The harmful effects from the particles were observed even in areas where concentrations were less than a third of the current standard set by the Environmental Protection Agency (EPA).

Although prescribed burn smoke is likely to contain residues of fire accelerants such as potassium permanganate, gas and diesel, and the amounts and effects of breathing these chemicals when

volatilized into smoke has not been measured or evaluated by the Forest Service, the most damaging aspect of breathing smoke is the PM 2.5. This fine particulate can affect lung function, cause eye and nasal symptoms, adversely affect the immune system, increase heart attack risk, and increase cancer risk.

In addition to particulates, wood smoke contains benzene, formaldehyde, acrolein and polycyclic aromatic hydrocarbons. In New Mexico, smoke from prescribed burns may also contain heavy metals, including uranium, as the trees draw up heavy metals from the soil, which are volatilized when trees burn. These chemicals are toxic in various ways to the human body.

The health impacts of smoke are well documented, but in their analysis, the Forest Service pays only cursory attention to them (EA 143), without presenting data demonstrating the detrimental effects of prescribed burn smoke on different segments of the local population with varying ages and health conditions. Not a single medical or other scientific source is cited in the EA detailing the effects of smoke on the function of the human body. A well-documented, comprehensive, and scientific analysis of how prescribed burn smoke from the Proposed Action is likely to affect both the people who implement fuel treatments and the people who live and work in and nearby Santa Fe is essential.

Through the scoping comments for the project submitted by the public, the Forest Service was made well aware of the suffering prescribed burn smoke causes for many local residents. However, the Forest Service has never publicly acknowledged the presence of such comments or even significantly modified its Proposed Action so as to generate less smoke. As a publicly funded agency conducting and proposing a highly polluting fuel treatment, the Forest Service has an obligation to be sure every resident of Santa Fe and health care provider in Santa Fe is directly provided with full disclosure of the health impacts of the smoke which would be created by the Proposed Action.

Suggesting that vulnerable people stay inside behind closed doors and windows, and perhaps drive to pick up a loaned air filter, is far from sufficient protection for vulnerable populations. Finally, the

Forest Service must recognize that many Santa Fe area residents, particularly those who are most vulnerable to the health impacts of smoke, do not have the time, flexibility, and/or resources to evacuate to a different area before every prescribed burn, if that is necessary. The Forest Service must disclose in an EIS, therefore, that its Proposed Action will cause some vulnerable residents to stay in place, breathe the smoke from fuels treatments, and as a result suffer dangerous health impacts.

The EA utilizes some unproven and exceedingly unlikely assumptions in comparing the emissions from prescribed burns versus wildfire. The Forest Service unrealistically assumes that over the next 10-15 years:

- a) The chances of the entire Project Area succumbing to wildfire is 100% if the proposed fuels treatments are not undertaken, and
- b) The chances of there being a wildfire anywhere in the Project Area if the proposed fuels treatments are undertaken is 0%.

EA 149-151. Note that at the same time, the Forest Service states that:

The vast majority of the SFMLRP area has not burned in over 100 years.

EA 10. The Forest Service assumes the Project Area will burn severely in the upcoming 10-15 years if the Proposed Action is not implemented, without explaining why it is not more valid to assume that the Project Area will follow the past trend of not burning, at least to some extent, rather than suddenly and radically changing to a new trend.

The agency owes the public a scientifically reasoned, credible analysis of a) the probabilities of wildfire in the Project Area, and b) the expected efficacy of its fuels treatments in preventing wildfire. Without such an analysis, there is no reasonable basis for the Forest Service's Proposed Action. The Forest Service must do the analysis and include it in an EIS.

The Forest Service must complete a comprehensive Environmental Impact Statement for the proposed SFMLR Project and thoroughly analyze the real effects on the public of the prescribed burning that has been both completed and proposed to be completed in the Project Area. The

Forest Service must analyze the cumulative impacts of prescribed burn smoke from the Proposed Action along with the prescribed burn smoke from ongoing projects, and from other proposed projects such as the Encino Vista Landscape Restoration Project. This includes fires that are managed for resource benefit, which are often managed similarly to prescribed burns.

Thank you for your attention,

Sarah Hyden

Jonathan Glass

February 3, 2021

To: The Forest Service

Re: Health Impacts of Prescribed Burns

My name is Erica Elliott. I am board certified in both family practice and environmental medicine. I am writing on behalf of my patients, many of who suffer from severe allergies, asthma, and chemical sensitivities.

Each time the Forest Service carries out a prescribed burn, those sensitive patients suffer terribly. Most of them have nowhere to escape in order to get relief from the smoke. Some seal up there windows and doors with tape, but the smoke still manages to seep into their homes.

Over the years, I think you have gotten similar emails and letters, and yet it doesn't seem to have made any difference in the burn practices.

I look forward to hearing from you.

Thanks,

Erica M. Elliott, MD

To Whom It Concerns, My response to these plans for the forest is very personal, as I have relocated to NM

from CA 24 years ago to escape the impact of herbicide on my condition of severe MCS, and found myself having to constantly defend myself against the negative impact of smoke and all the chemicals it contains, increasingly through the years here. My health and my home have no stability, as I suffer severe relapses in my condition and exacerbation of life threatening symptoms, every time a prescribed burn takes place, if I do not literally pack up and leave the area, for days, weeks or months.

in spending a significant amount of time in Colorado to dodge these burns, i have found that the burning that takes place there is administered with a lot more care and concern for the public, better notification, and burns not getting out of control and causing catastrophic impacts, in comparison with what has gone on in New Mexico, especially since around 2005. never have i seen a burn implemented up there, or known of it, as I am on notification lists up there even when I am here, when 15 to 25 mph wind gusts are either forecasted or present, as they were this past Wednesday when 350 acres were burned with aerial ignition in the watershed, approximately 2 miles or less from my home in Santa Fe.

The impact of such smoke causes me to suffer cognitive and motor coordination failure such that I become accident prone, and have injured myself several times during burns, dropping heavy or sharp objects on my feet, and tripping and running into things. This is in spite of having a HEPA air purifier running in all the rooms of my home..

With the increasing amount of acreage proposed to be burned and the increasing frequency, with herbicide added into the mix, I may not be able to maintain any presence in Santa Fe any longer, literally being driven out of here, out of my home too frequently to maintain it any longer, and becoming homeless. If i fail to be able to leave at the right times and/or relocate away from here permanently, I may land in the hospital, due to inability to breathe and/or the results of a smoke induced accident at home or in my car..will the forest service pay my medical bills?

i am literally one of the 'canaries in the coal mine", and my problems illustrate the impact on everyone that either does occur without being acknowledged (how many people really know where their headaches and spaciness and medical problems are coming from?) or can and will occur over time as more and more people succumb physically and mentally to these impacts.

Please seriously consider all the information submitted by Dr. Ann McCampbell and others concerning the extreme toxicity of smoke/chemicals and herbicides involved in your plan, and alter the plan in favor of the survival of the forest and the people...Thank you, Peggy McCarty