Data Submitted (UTC 11): 6/21/2024 11:42:43 PM
First name: Myron
Last name: Temchin
Organization:
Title:
Comments: Amanda GinithanJune 21, 2024
Deputy District Ranger
11776 HWY 337
Tijeras, New Mexico 87059

ATTN: Myron Temchin Comment, Placitas Resident
North Sandia Fuels Reduction Project
REVISED COMMENT TO INCLUDE ADDITIONAL PETITION SIGNATURES
Dear Ms. Ginithan:

Representing over 340 residents of the of Placitas Community, (Public) whose signatures are attached to this Comment as ATTACHMENT 2, we thank to the United States Forest Service (FS) for seeking public comments on its current proposal defining a Sandia Fuel Reduction Project, to restore, maintain, and improve forested conditions on approximately 2,956 acres on the Sandia Ranger District, Sandoval and Bernalillo Counties, Sandia Mountains, north of I-40 (NM165 Project).

Following our detailed analysis of information, the FS provided information presented in the Placitas Library Meeting of April 24, 2024 in the Placitas Library and, information currently available on the FS's project specific web site, rightfully or not, it appears that there are numerous existing CONCERNS AND UNCERTAINTIES in the Public's understanding of WHY the FS is rapidly moving to formalize a "Prescribed Burn" ("Decision -07/01/24 (Estimated)") for the subject project (in specific the NM165 hazard tree canyon area) without providing adequate documentation and communication justifying this methodology as its "best-fit" proposed preferred remedy.

It is important to note that this lack of collaboration and outreach to the Public coupled with the difficulty in finding additional supporting documentation (not provided by the FS that could answer our concerns), leads to the understanding that some of the comments presented herein may be based on misperceptions that could easily be dismissed if the Placitas Community truly had a collaborative communication process, a FS/Community "Partnership".

As a result, based on the best available data, the Public represented herein believes that the FS's Prescribed Burn proposed remedy apparently may not comply with its own Forest Service Handbook (FSH) requirements nor does it appear to comply with the recommended corrections, enhancements and improvements mandated in the Gallinas-Las Dispensas Prescribed Fire Declared Wildfire Review, Santa Fe National Forest, Southwestern Region (lessons earned Report). In summary due to the lack of collocative communication we have the following perceptions and/or misconceptions as the truth of the situation will reveal:
*Many years of FS "Suppression Policy" & continued rejection of residential permit requests to remove wood
*Lack of faith in the FS Prescribed Burn performance based on Hermit's Peak/California Canyon tragedy
*Questionable basis for arriving at a Prescribed Burn decision as an appropriate "Best Solution":
oComment #1: Failure to update decision using Gallinas-Las Dispensas Prescribed Fire Declared Wildlife Review Report
oComment #2: Lack of Specificity in Purpose and Needs Report
oComment #3: Concerns associated with April 24th FS Slide Presentation & lack of a "Collaborative Process" with the Placitas Community
oComment #4: Lack of discussion of "Prescribed Burn Control" details
oComment #5: These Concerns & Uncertainties constitute EXTRAORDINARY CIRCUMSTANCES and lead to mandatory additional studies not discussed with the Public

Based on these CONCERNS and others, we respectfully submit in ATTACHMENT 1, the following substantive comments and discussions that define UNCERTAINTIES along with, supportive reasoning and justification for each comment as they specifically relate to FS's proposed Prescriptive Burn.

oComment #6: AS A RESULT, TO ADDRESS AND DISPEL ANY MISPERCEPTIONS THAT MAY EXIST WE RESPECTFULLY REQUEST THAT THE FOREST SERVICE CONSIDER INCLUDING IN ITS PROPOSED DECISIONING PROCESS TO FINALIZE THE PRESCRIBED BURN IN JULY 2024,
* THE DEVELOPMENT OF A HIGHLY PROACTIVE PLACITAS COMMUNITY "PARTNERING CORE TEAM" TO:
*Develop an optimized path forward to quickly remedy the hazardous fuels threat (Attachment 1, Figure 2: Decision Tree Flow Chart, Pathway), and
*Communicate the results of the Core Team's synergistic efforts to the Public to dispel misperceptions and continue to build Public confidence and support.
To support the validity of these requests, ATTACHMENT 2 contains a PETITION that contains the signatures of 300+ Placitas residents supporting the requests summarized above.
In closing, we want the FS to know that our PLACITAS COMMUNITY SHARES THE ITS CONCERNS OVER THE CURRENT CONDITION OF THE PROJECT AREA. We only ask that the FS rapidly make a best effort to develop a Placitas Community Core team; "Invite our leadership to the Table" to join in the development of optimized plans for hazardous fuel reduction and acquiring and confirmed resources necessary to solve the inherent threats that exist with absolute minimum negative impact to human health and the environment.
As such, we are immediately available to participate in such a "partnership" with the FS to support, maximize and accelerate the benefits of your future work efforts.
Once again, we thank the FS for the opportunity to submit these Comments, to define our concerns, to dispel misperceptions, to communicate the value of actions that will take place in the future and to support the FS in the implementation of what we hope will be a most successful project.
Respectfully;

Myron Temchin
for THE ATTACHMENT 2, PETITION DEFINED PLACITAS COMMUNITY