

Data Submitted (UTC 11): 10/5/2021 8:01:30 PM

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Title:

Comments: OPPOSITION TO "THE SANTA FE MOUNTAINS PROJECT"

I am a retired attorney who practiced in Santa Fe. I live in the La Cueva region next door to your proposed thinning and prescribed burning plan. I have listed the reasons why I am adamantly opposed to this Project:

1) The Project is the largest thinning and prescribed burn effort ever proposed for our mountains. The Forest Service plans to cut a majority of trees within 18,000 acres, then repeatedly burn 38,000 acres within a 79 square mile area. Past projects have left damaged, barren and dried-out ecosystems, destroying the natural beauty of our fragile, high desert forests. Over 5,000 comments have been received with the vast majority opposed to this Project, yet the FS has only performed the minimal "Environmental Assessment", rather than the more thorough Environmental Impact Statement. We insist the FS perform this more comprehensive analysis.

2) One of the major reasons for this Project is to prevent wildfires from burning our homes. However, it has been proven that active thinning around structures renders them safer than cutting down the forest. In 2016 a study revealed that such treatments are useless for decreasing the amount and intensity of fires in Western forests, and may even increase fire impact. Also, the open land resulting from the removal of the majority of trees increases wind speeds and enhances destructive fire behavior. In fact, thinned and open forests are drier and more flammable. Debris left from logging and thinning causes wildfires of greater intensity. Simple observation of "treated" areas demonstrates that forest ecology has been greatly harmed.

3) Another justification for this Project is eradicating the so-called "over-abundance" of trees and vegetation. However, by removing the vast majority of trees and understory and by repeated burning, you insure that understory will never return to support a natural and healthy forest. Furthermore, our local watersheds have been severely damaged due to draught caused by climate change, and this Project will cause further damage to these vulnerable areas.

4) Wildlife habitat will also be severely affected by this Project. With urban sprawl many species of wildlife are already threatened. This Project will guarantee the loss of many more precious animals

5) The FS uses outmoded research justifying prescribed burns and thinning every 5-15 years, whereas more recent research argues that treatment should be applied only every 55 years. (William Baker, 2017) Intentionally burning forests this frequently creates dry, barren and sterile forests lacking ecological integrity and diversity. Trees help cool the forest floor and retain moisture for a healthy forest ecosystem.

6) Ten years ago, the Santa Fe region had exceptionally clean air. Today, with the amount of prescribed burn smoke in the air, which has increased yearly, the public health is being substantially impacted according to local physicians. The most damaging aspects of breathing smoke is inhaling the tiny particulates known as "PM 2.5". These fine particulates affect lung function and can cause eye and nasal symptoms, adversely affecting our immune systems and increasing the risk of heart attack and cancer. (Doctors and Scientists Against Wood Smoke Pollution)

7) Lastly, when forest projects of this scale are planned, which significantly affect the human environment, environmental law requires rigorous analysis, such as an Environmental Impact Statement, to be conducted to insure our safety and forest health using the best available science.

This Project, if it proceeds, will unquestionably have devastating effects on our forests and our health for generations to come.

Please halt this Project until a thorough E.I.S. is performed.

Thank you