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Organization:

Title:

Comments: To whom it may concern,

I'm writing you regarding the planned Santa Fe Mountains Landscape Resiliency Project. As an avid hiker and resident of Santa Fe, I'm a frequent user of the Santa Fe National Forest and therefore in the group of people most impacted by this project.

Below are five of the main requirements/concerns I believe haven't been addressed sufficiently at this stage of the project:

#### I. Environmental Impact Statement

- A EIS is required when a project has significant impacts on the human environment that is controversial and when a project damages forest resources
- A range of alternatives is required. This project is complex and has a substantial impact on the public and the environment. A range of alternatives will provide options to find a solution that is acceptable to the public and beneficial for the forest ecosystem.
- The prescribed burn emissions in the mountains outside of Santa Fe would have a substantial adverse effect on human health. It is in no way proven that prescribed burns substantially replace wildfire or that prescribed burns do not increase the amount of smoke we inhale. In fact, indications are that prescribed burns are largely in addition to wildfire. The Forest Service must analyze how much more smoke the public will be exposed to as a result of this project.
- Widespread thinning and burning does not improve the scenic quality of the forest, it degrades it.

#### II. The condition-based approach should not be used to analyze this project.

- The parameters for treatments are so generalized that we know neither where treatments will occur nor how they will be carried out in a site-specific way.
- There are maps that show potential thinning/burning units across the project area, but it is also stated that treatments may be implemented outside of the areas designated on the maps: "The actual location of forest treatments would occur where deemed appropriate at the time of implementation." (Environmental assessment, p. 31)
- Residents of forest communities want to know if thinning will occur adjacent to communities and to what degree.
- We need more information about where and how treatments would occur in Inventoried Roadless Areas, which are intended to be preserved in a natural state.

#### III. The environmental assessment analysis does not use the best scientific information available

- The Forest Service used only studies done by scientists that agree with its ecological perspective and none from scientists with a conservation perspective.
- The areas of the project where thinning and repeated prescribed burning is done will be essentially lacking an

understory. There were no references in the environmental assessment to indicate that historical forests had no substantive understory. The existence of an understory is a natural condition at any time and beneficial to wildlife species.

- The analysis over-relies on fire scar studies to reconstruct historical fire regimes, and it provides no discussion of limitations of such studies. Limitations include that the fire scar studies utilized a small number of plot samples, and that trees that burned at high intensity no longer exist. Multiple lines of evidence are necessary.
- The analysis assumes that proposed fuel treatments will be beneficial to Mexican spotted owls when there are a number of studies calling that into question.
- There is no analysis of the health effects of the increased amount of smoke the public will inhale due to prescribed burning.
- There is no analysis that estimates how much smoke is emitted by wildfire compared to the combination of prescribed burns and wildfire.
- Burning every 5-15 years is too often and does not allow the understory to return.
- High severity fire is defined in the environmental assessment as over 75% tree mortality, while most studies define high severity fire as 90% tree mortality. As a result, it overstates the potential for high severity fires.
- Thinning from approximately 500 trees per acre down to 2-50 trees per acre is approaching a clear-cut. It leaves the forest dry and open, allowing trees to blow over and the wind to whip between trees, intensifying wildfires.

#### IV. The Forest Service has not really included the public in the analysis process

- The Forest Service has not given sufficient notice of project comment periods. A number of commenters stated in their scoping comments that they did not know about the comment period in time to write thorough comments.
- The Forest Service only presented science at public meetings that was in accordance with its own perspective.
- The Forest Service did not allow the public to view any of the over 5,000 public scoping comments online or even in person at Santa Fe National Forest headquarters.
- Freedom of Information Act (FOIA) requests are often fulfilled by the Forest Service months or even years after the request is made and often past the time that the FOIA request will be useful to the requester.
- The Forest Service has been understating the extent of the project to the public. Forest Service personnel on multiple occasions stated in the media they would only be thinning small trees, when in reality the draft environmental assessment states that even larger-sized trees will be thinned.

The Forest Service defines small trees as trees under 9.9" DBH (diameter at breast height), and they propose to thin trees up to 16" DBH.

#### V. The Forest Service's project planning and analysis must...

- Include an Environmental Impact Statement, with a full range of alternatives.
- Reduce the amount of trees to be removed by at least 75% (leaving more trees per acre) and greatly reduce the

number of acres treated. We need more trees, not fewer. Forests that are thinned and/or logged tend to burn more often and at a higher intensity.

- Increase time between prescribed burn treatments.
- Leave most of the forest understory.
- Close and decommission forest roads which increases fire risk and are damaging to forest ecology.
- Not build more roads or improve existing roads, unless there is a critical need to do so.
- Analyze impacts of thinning and prescribed burns on the Mexican spotted owl. The current environmental assessment is inadequate in this regard.
- Keep livestock out of riparian areas, and preferably keep livestock out of the project area altogether.
- Reduce the amount of emissions from the project (smoke) by at least 75%.
- Not thin in Inventoried Roadless Areas.

Thank you for your time and consideration.

Sincerely,  
Kurt Stritzl