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?As a Santa Fe resident, a frequenter of the project area in question, and (as a U.S. citizen and Federal taxpayer) a shareholder in these Federal lands, I submit the following comments on the Santa Fe Mountains Landscape Resiliency Project Draft Environmental Assessment.

## 1. UNDEFINED TERMS

The use of the word "catastrophic", which occurs 46 times as a wildfire descriptor in this document, is undefined in the EA glossary, plays purely on emotions without any precise, shared, or operational scientific or ecological meaning, skews opinion without any clear grounding in science or fact, and is thus inappropriate for inclusion in a document of this nature. Since this word has no clear or shared definition in reference to fire, all instances of it should be removed from the EA and all other current and future Project-related documents.

The word "uncharacteristic", which appears 33 times to describe wildfire in this EA, is similarly undefined in this document.

The word "severe" appears 25 times in conjunction with fire in this document. While the word "severe" is defined generically ("the quality or state of distress inflicted by a force. The degree of environmental change caused by a disturbance (e.g., fire)", this is a simple dictionary definition, and not a particularly good one at that. It is, yet again, not a technical term. "Severe fire" as such is never defined in this EA.

The word "severe" is used in conjunction with the word "uncharacteristic" in reference to fire 10 times in this document. Given the above, this means that "severe" appears without "uncharacteristic" in reference to fire 15 times in this EA, and "uncharacteristic" appears 23 times without "severe" in reference to fire in this EA.

The phrase "high-intensity" appears 74 times in this document. It, too, is undefined.

For this to purport to be an actual BASI-based Environmental Assessment, assembled and written by professionals, and yet fail to precisely define the terms central to the Project's purpose-the prevention of "catastrophic"/"uncharacteristic"/"severe"/"high-intensity", etc. wildfire-is representative of the sloppy and slipshod approach this Forest has taken to this entire project. As is clear from the above, there is zero clarity, for the reader but also apparently for the writers of this EA, as to what any of these terms actually means in reference to wildfire, or relative to one another. Are they actually interchangeable? Can a fire not in fact be "severe" but still not "uncharacteristic"? Or "severe" but still ecologically appropriate? Or "severe" and not "catastrophic"?

And what of a "crown fire"? This is defined in the glossary as follows: "Crown fire (crowning): a fire that burns and moves through the uppermost branches (crowns) of trees and spreads from crown to crown. Fire burning in the crowns of trees is an indicator of a high-intensity wildfire." What, then, is a "high-intensity wildfire"? Is it the same as a "severe" fire? Or an "uncharacteristic" fire? Or a "catastrophic" fire? Are all crown fires a problem? Is "crown fire" a synonym for "severe", or "uncharacteristic", or "catastrophic"? Or are some crown fires okay? If so, then when are they okay and when not? Is it a function of simple acreage? If so, how much acreage? Or is it "intensity"? Then what defines "intensity"? Scale? Temperature? Or must it be both?

Where is the science, and particularly the ecology, in any of this sloppy imprecision?

Given the above, this and any related project documents must be rewritten so as to convey with standard and

appropriate scientific precision, clarity, consistency, and supporting citations the operating definitions, distinctions, and various usages of each one of these terms so frequently used in this document. In addition, each instance of their respective use within this and related project documents should be applied with the same precision, clarity, and consistency. Anything less than a full and complete edit to correct what amounts to a confusingly incomprehensible stew of emotionally shrill but functionally empty fire descriptors with no substantive definitions, can (and will) be construed as either base ignorance, cavalier negligence, or intentional obfuscation on the part of this Forest.

## 2. RIPARIAN TREATMENT

The third paragraph on p. 38 reads:

Fencing may be installed if needed to protect restored areas if it is determined that riparian vegetation regeneration is being hampered by browsing and grazing.

If it is "needed to protect restored areas" and "it is determined that riparian vegetation regeneration is being hampered by browsing and grazing", then there is, by the wording of this very sentence, a "need".

This should therefore be changed to: "Fencing will be installed if needed to protect restored areas if it is determined that riparian vegetation regeneration is being hampered by browsing and grazing."

This wording also needs correction on p. 45: "For proposed riparian restoration activities within Tesuque Creek and Arroyo Hondo, fencing may be installed, if needed to protect restored areas if it is deemed that riparian vegetation regeneration is being hampered by browsing and grazing." For the same reason, this sentence should be changed to: "For proposed riparian restoration activities within Tesuque Creek and Arroyo Hondo, fencing will be installed, if needed to protect restored areas if it is deemed that riparian vegetation regeneration is being hampered by browsing and grazing."

## 3. WATER QUALITY

a. The first bullet on p. 132 reads:

Within affected pastures, grazing would be deferred for at least one year; longer if vegetative ground cover is not thriving and adequate to protect the soil from erosion (Range-12).

The citation to Appendix C, Range 12 reads:

Range-12. Livestock would be managed to allow for habitat response after project implementation. Allotment pastures would be rested from grazing for a minimum of one year following broadcast burning of that pasture. Prior to livestock being authorized to graze an area that was treated with prescribed burning, interdisciplinary vegetation monitoring would be conducted to determine if plant health and groundcover has recovered sufficiently to support grazing and protect soil.

While this stipulates that pastures must be rested for a minimum of one year following burning, it provides no objective criteria for the determination of when that pasture will be reopened. "Not thriving and adequate to protect from erosion" is not an objective criterion. Neither is "recovered sufficiently". What constitutes "thriving"? What constitutes "adequate"? What constitutes "sufficiently"? Is it a percentage of total ground cover? A vegetative height? How does slope gradient bear on this? What about particular vegetative compositions?

This and the related project documents must provide and articulate an objective measure for what constitutes its

criterion for "thriving", "adequate to protect from erosion", and "recovered sufficiently". Simply citing "interdisciplinary vegetation monitoring" is not sufficient, and not science. This EA must clearly articulate what specific numerical or other criteria this monitoring will use for making its determination that the pasture "has recovered sufficiently to support grazing and protect soil."

This applies by extension to the second bullet on p.135: "Design criteria would prohibit grazing any pasture for at least one year following a broadcast burn, potentially longer depending on ground cover response and vitality." Yet again-what response? How will this be measured? And just what constitutes "vitality"? What is the objective measure for this determination?

b. The fourth bullet on p. 132 reads:

\* "If deficient or affected, riparian vegetation would be planted to increase stream shade."

Yet again. "Deficient" is not an objective criterion. This EA must explicitly articulate what constitutes "deficient", in some objectively and numerically measurable term. What is the objectively measurable threshold at which "deficient" becomes "sufficient"? If this project is actually rooted in science and not just empty rhetoric, the Forest should and must be able to provide its criteria and citation of supporting documentation.

#### 4. INVENTORIED ROADLESS AREAS

-The first full paragraph on p.133 reads: "Overland travel by vehicles that do not require roads to be constructed (e.g., masticators, UTVs) may occur (U.S. Forest Service 2021m)."

The very definition and sine qua non of an Inventoried Roadless Area is that it be roadless, and the Forest is required to ensure that this characteristic is preserved. The use of any "vehicle", including masticators and UTVs, necessarily risks the creation of a de facto road, whether or not the Forest chooses to define it as such. This Forest has a long-standing and ongoing problem with illegal road and trail creation and illegal use by ORVs of ostensibly closed and decommissioned Forest roads. Four years ago, I personally accompanied District Ranger Steve Romero and the Forest's sole Law Enforcement Officer into just such an existing closed road and illegal trail incursion area in one of the very IRAs included in this proposed project, in the Arroyo Hondo area bordering the watershed. At that time both District Ranger Romero and the Law Enforcement Officer present acknowledged that illegal trail construction and use of ostensibly "nonexistent" (on the ground but not on the map) roads by vehicles and ORVs were occurring here. Both the District Ranger and Forest Law Enforcement Officer also acknowledged that, with only one law enforcement officer on the entire Forest, this was not something the Forest could ever actually monitor or enforce.

This project, through its additional route-making via "overland travel" by Forest vehicles, increases the opportunities for yet further illegal incursions into IRAS, thus enabling the extension and expansion of a problem the Forest has acknowledged it already cannot properly address. This EA makes absolutely no explicit provision for ensuring that any de facto trails and de facto roads created by "overland travel by vehicles that do not require roads" are fully and effectively decommissioned and made inaccessible following the proposed thinning and burning actions. Since this Forest is legally obligated to ensure that the roadless character of any IRA is preserved, this EA must address and define the design features and mitigation measures it will use following the proposed overland vehicular travel in these areas to ensure that these project-created routes are effectively decommissioned and made inaccessible for any and all subsequent ORV or vehicle use by the public. Failure to do so makes this Forest culpable in undermining the defining feature of an IRA.

#### 5. POTENTIAL LOSS OF CONTROL OF A "CONTROLLED BURN"

As someone who was present in Santa Fe during the Cerro Grande Fire, I have witnessed first-hand the effects of a so-called "controlled burn" gone entirely out of control within less than a day of its ignition. I find nothing in this EA that addresses any of the potential environmental consequences of a Forest-ignited burn within the proposed "project area" leaving the project area. Since there are structures, communities, Inventoried Roadless Areas, other watersheds, and a Federally listed species all in areas immediately adjacent to, or directly downwind of, the area defined by this project, it is incumbent upon this Forest to explicitly disclose and address the potential effects of any burns in this project area escaping their intended bounds. Were a fire to leave the project area, what is ultimately at risk? This document fails to address in any way this possibility, which the Cerro Grande Fire demonstrated in no uncertain terms is a very real. To fail to do this is to neglect potential environmental impacts that are not purely hypothetical, but indeed possible, as the Cerro Grande showed all of us who were here.

## 6.. EIS

The above are just a few of the striking examples of the failure of this Forest, in its sloppy haste, to do its due diligence in effectively planning for a project of this magnitude and complexity. By side-stepping a full and proper EIS, this Forest irrevocably undermines its credibility on this and all other future projects. The Forest's failure to initiate an EIS from the very start, and subsequent failure to heed the many voices requesting an EIS, reeks of partisan bureaucratic fast-tracking at the expense of a full, measured, comprehensive scientific planning. I thus reiterate my request that the Forest conduct a proper Environmental Impact Statement, and thereby hold itself to a higher professional standard than the sloppiness of so much of this EA gives evidence of.