

Data Submitted (UTC 11): 10/29/2021 6:20:43 PM

First name: Lauren

Last name: McGavran

Organization:

Title:

Comments: I am requesting that the USFS prepare an Environmental Impact Statement for the Santa Fe Mountains Landscape Resiliency Project. The draft Environmental Assessment is not sufficient. It ignores scientific studies that contradict its proposed Action.

I have spent my life hiking in and exploring the Santa Fe National Forest. Now that I am retired, we visit the Forest several times a week for gentle walks in the woods. The forest is an integral part of my being; its health is as critical to me as my own. I see this Project ignoring recent scientific studies and damaging the forest, not helping it.

This project is huge and controversial. Its impacts have not been adequately addressed. An Environmental Impact Statement is needed to ensure that alternatives have been carefully considered. The binary "Action/No Action" does not offer alternatives. The proposed plan of burning and aggressive thinning leaves a degraded "forest." It destroys cool, shaded woodlands and leaves sparse, unshaded, windy areas barren of undergrowth and filled with invasive weeds. I have seen the results of these treatments in the Jemez Ranger District.

The Project needs to be more specific about where treatments will be applied and how they will be done in each area. The maps show areas of potential treatments, but do not include all the areas that might be treated, nor details about what will be done in any specific area. How close will treatments come to communities? How much will be removed there? How will you proceed in Roadless Areas?

Perhaps my biggest complaint with the Environmental Assessment is that it uses studies that support the Action alternative and ignores opposing studies. The "desired condition" is sparse trees, no canopy, and no understory. There is evidence that this is not the historical or natural state of a forest. Using fire scars to construct historical fire conditions has limitations that are not addressed. Intense fires do not leave burn scars; the trees are killed. The size and number of plot samples affect the conclusions; data must be interpreted with those parameters in mind. Studies (e.g. by Dr. Chad Hanson) show that Mexican spotted owls benefit from areas of intense fire and are harmed by thinning and prescribed fires. The EA defines high severity fires more broadly than is generally used, thus overstating its potential. Studies also show that thinned forests often burn more intensely and move more rapidly than unthinned ones. Fire models corroborate this finding.

The EA does not adequately address the issue of carbon release and storage. An analysis must include the total carbon release, including the fossil fuels needed to carry out the treatments, the effect of soil compaction, the loss of sequestration potential by reducing the number of trees, the carbon released by slash burning, and the regrowth rates, among other effects.

The Forest Service has not been forthcoming to the public with the analysis process. It has not presented opposing scientific studies; it has not shared public scoping comments; spokesmen have said, in meetings, that only "small" trees (<10" DBH) will be thinned, but the EA includes trees up to 16" DBH.

The USFS needs to complete an EIS that has real alternatives. These alternatives must include leaving the forests less disturbed. That is, leave more trees, more time between burns, an undamaged understory and forest floor, fewer roads. Cattle must be restricted to keep them out of riparian areas. The EIS needs to look at scientific studies that refute its current desired actions.