

Data Submitted (UTC 11): 10/16/2021 6:00:00 AM

First name: William

Last name: Gooch

Organization:

Title:

Comments: To Whom It May Concern,

The currently proposed Santa Fe National Forest Management Plan should be scrapped and rethought completely. As it stands, the plan is overly aggressive and would result in massive, perhaps unrecoverable destructive impact to the forest. The plan lacks any sound scientific basis for achieving the stated goals, and a substantive environmental impact assessment has yet to be done. At the same time, the plan as stated is vague and unspecific, leaving far too much room for variation in its application.

The proposal for massive, rapid thinning and frequent subsequent prescribed burns will not in any sense "restore" the forest to a semblance of a natural or healthy state. Instead, thinning as prescribed will transform the areas treated into savanna rather than forest, and prescribed burning at 5-15 year intervals will prevent needed regrowth and recovery. Much of the wildlife in the forest, including endangered species, will not be able to remain in a healthy natural state as a result. In addition, the failure to substantially reduce or eliminate livestock grazing and motor vehicle traffic will result in additional adverse impacts to areas that are already stressed by overly aggressive treatment under the plan.

What the forest needs to be restored to a healthier, more natural state is largely to be left alone for nature to take its course. Rather than stepping back after recognizing the faults in prior management practices, the forest service is proposing to become even more aggressive in an attempt to engineer the forest into a man-made, completely unnatural state. The result would be an environmental disaster, not only due to the forest and soil destruction caused by heavy equipment used to do the proposed thinning, but also because of ongoing smoke pollution caused by frequent prescribed burning.

There is legitimate reason for concern about the health of the forest after decades of a policy of blanket fire prevention. To its credit, the forest service has moved away from this policy and is more often allowing wildfires to take their course unless structures are threatened. Even so, the best way to prevent wildfire from damaging structures has been demonstrated to be removal of trees in a small radius around the structures themselves. Forest thinning has been shown to have little or no effect in terms of protecting structures, and may in fact cause fire to pass more quickly through thinned areas than it otherwise would.

The plan is inaccurate in its assessment of the frequency of severe burns in a natural forest setting, due to the use of incomplete, biased data. Severe as well as more minor burns are a natural part of the cycle in a healthy forest. The forest is naturally able to recover from such burns, and in fact its long term health depends on burns at all levels of severity.

Nature has a way of achieving a healthy balance in wild areas when it is allowed to take its course. What the forest needs is gentle and mostly hands-off management, as well as the removal of man-made adverse impacts including livestock grazing and motor vehicle traffic. Although some degree of thinning in very limited areas may be indicated, there is no sound scientific basis for wide-scale thinning treatments or burning as proposed.

Please reconsider this entire plan, and start over. The forest and the environment are far more important than the unknown agendas driving the currently proposed plan.

Thanks for your time and attention.

Bill Gooch

Santa Fe, NM