Data Submitted (UTC 11): 11/12/2021 6:16:52 PM

First name: William Last name: Gooch Organization:

Title:

Comments: Santa Fe National Forest Plan Interested Person Request

I'm hereby requesting to be included as an interested person regarding the proposed Forest Management Plan for the Santa Fe National Forest. I've previously commented on or about October 16, 2021 regarding my objections to the plan on the following grounds:

- 1. There is no scientific basis to justify the plan's assertions that it will accomplish its stated goals.
- 2. The plan as proposed is far too vague about what exactly will be done in which portions of the forest.
- 3. Insufficient attention has been given to protecting endangered species under the proposed plan. There is no basis for the assertion (for instance) that the spotted owl habitat will be adequately sustained.
- 4. No substantive environmental impact assessment of the plan has yet been done.
- 5. The data used to support the proposed plan's assertions regarding the historical frequency and severity of naturally occurring wildfires is biased, largely due to the use of burn scar evidence that obscures the appearance of severe burns. This contributes to erroneous conclusions regarding the proposed high frequency of prescribed burns.
- 6. Rapid, massive thinning of trees as has been practiced by the USFS in recent times is recognized by experts to unnecessarily stress the remaining vegetation for a variety of reasons (including but not limited to the use of heavy equipment, thinning during damaging pests' active times, and removing a large percentage of trees at once), substantially limiting its ability to recover.
- 7. Contrary to claims made in the proposed plan, scientific studies some conducted under the auspices of the USFS itself show that thinning as proposed does little to affect the impact of wildfires.
- 8. The proposed plan does little or nothing to limit the impact of motor vehicle traffic or livestock grazing within the forest.