Data Submitted (UTC 11): 10/14/2021 6:00:00 AM

First name: Jon Last name: Klingel Organization:

Title:

Comments: It contains some correct statements, some incorrect statements and some unjustified conclusions. It seems to be designed to be emotional and cause confusion.

- 1) The brochure emphasizes wood fire smoke is not healthy. The recent science seems to verify this is true. However, humans have lived and probably evolved with wood fire smoke, from forest and cooking fires, for many, many thousands of years. The Alaska native word for summer is "smoky season". I suspect the health problems reported may be the result of being added to all the other serious air pollutants we humans generate and breath in daily. Fire is a regular, often common, natural part of many forest systems. Some forest systems have evolved to need fire for maintenance and regeneration (e.g. serotinous cones). Ponderosa pine and frequent fire dry mixed conifer in New Mexico need regular low intensity fire.
- 2) The brochure says some of the Encino Vista Project areas "have dense stands of even-aged trees as an aftereffect of logging projects of the past". Likely a true statement. It does not say what type of forest it is. Is it Ponderosa pine, frequent fire mixed conifer, wet mixed conifer, or spruce-fir? Whether thinning and burning is appropriate depends on the forest type. It would be appropriate in ponderosa pine and frequent fire mixed conifer. It would not be appropriate in wet mixed conifer or spruce-fir. Considering that the project is on the north side of the caldera (i.e. northern exposure), it likely includes significant amounts of wet mixed conifer and spruce-fir at higher elevations where thinning and burning would not be appropriate. The devil is in the details.
- 3) The brochure says material would be brought out on 'existing or "temporary roads", which typically become permanent roads'. True. Roads and heavy equipment are bad for forests for many reasons. We need fewer roads, not more. Forests in NM (and perhaps all of Region 3) do a grossly inadequate job of closing roads and the situation is getting worse with ATVs. Are there any forest roads in NM that have been recontoured? To what extent are these projects primarily or significantly logging projects that are being "green washed"? We are seeing this happening on the Carson NF to the north of the Santa Fe NF. It does not encourage confidence in Forest Service projects in NM.
- 4) The stated purpose of these projects is to" reduce the impacts of wildfire and improve forest health". Whether the projects will be good for the forest or do a lot of harm depends on the type of forest, which is not stated in the brochure. Based on the size of the project areas, they contain a lot of forest where thinning and burning are not appropriate, and certainly contain some forest where it is needed. "The devil is in the details" of what, where and how. There will be some significant adverse impacts even where thinning and burning are appropriate and needed, especially considering the size of the projects. The impacts need to be thoroughly analyzed and made public.
- 5) The brochure emphasizes that the most important thing for structure protection (houses) is fire proofing the

structure and area close to the structure. This is a true statement. Thinning appropriate places in the forest and fire breaks can be helpful in fighting a "normal" fire, when conditions are not too extreme. Under extreme burning conditions, forest thinning and fire breaks are meaningless. Under these conditions, everything burns and spotting distances are measured in kilometers and miles. Most structures will not survive a fire storm. In NM, we are seeing more extreme conditions caused by drought and wind, with low live and dead fuel moisture. It is a result of global warming. Whether we will see the kind of fires that the west coast has been experiencing, remains to be seen. Does the Forest Service document clearly distinguish between "normal" burning conditions and extreme burning conditions?

- 6) Thinning does result in a drier forest, as pointed out in the brochure, with more grass and shrub growth in the understory. A ground fire will move through the open understory faster under normal fire conditions. Under extreme conditions, it does not matter. Ponderosa pine and dry frequent fire mixed conifer, under natural conditions, are drier forest types. They also experienced frequent low intensity fire under natural conditions. Ponderosa stands in the Southwest had a natural fire return interval of 2-11 years. Dry frequent fire mixed conifer probably had a natural fire return interval slightly longer. Most of the fire history data is from Ponderosa pine. Thinning and regular low intensity ground fires are good for these forest types, with grasses and shrubs replacing the sterile mat of needles that accumulates without fire.
- 7) The brochure states, "Debris left behind from logging and thinning can cause wildfires to burn more severely". True, under normal fire conditions. Red needle logging slash has long been considered the worst fire control situation, under normal fire conditions. Chipping and mastication also puts a lot of flammable material on the ground and will result in significant impacts if burned. Under extreme fire conditions, it does not matter, everything burns.
- 8) The brochure states, "Fires of all intensities have an ecological role in our forests". It depends on forest type. In Ponderosa pine, intense stand replacing fires probably almost never occurred under natural conditions. In spruce-fir, stand replacing fire is the normal situation, but the natural fire return interval was 200+ years.
- 9) The brochure states, "There has been no increase in high intensity fire in Western forests in the past two decades". I believe that is a completely false statement. I was involved with fire fighting in the 1960s into the 1980s. I don't recall any situations similar to what has been happening in CA, OR or WA. 1967 was the most intense fire year since 1910, up to that time, and was nothing like today's situation. It seems clear that global warming is having a significant impact on our forests. Thinning and burning in appropriate forest types may help the fire situation and will improve the health of these forest types.
- 10) There are many statements in the brochure that ignore science, are simply untrue, or appear to be designed to stimulate people's emotions and create confusion. Examples of these types of statements include: "may have been historically"; "so that most of the naturally-occurring understory does not return, ..."; "increase the risk of bark beetle outbreaks"; "fire is applied much too frequently"; "dry, barren, and sterile forest"; "from relatively natural forests to 'frankenforests'.

- 11) I disagree with many of the statements, conclusions and intent of the brochure. I am also concerned with the generalization of using the word "forests" to include all the different forest types. They can not be lumped together, especially when talking about thinning and fire. The science is clear that Ponderosa pine and dry frequent fire mixed conifer forest types should be much thinner than the current situation and that they need frequent low intensity fire. The science is also clear that spruce-fir and wet mixed conifer should not be thinned and burned. This brochure does not separate the forest types. Do the Forest Service plans separate proposed actions by forest type? I'll admit to being skeptical after seeing what the Carson NF is planning. "The devil is in the details".
- 12) I try to pay attention to Forest issues on the Santa Fe and Carson National Forests, and do volunteer work on both Forests. I was aware of the Santa Fe project and think it will generally be good for the forest, if done properly. I was not even aware of the Encino Project. Even well designed large projects will have some adverse impacts, some potentially very significant. Large scale projects such as these two, certainly will have some adverse impacts. Therefore, a pretty complete and thorough analysis of the impacts is appropriate (and required by law) before making a decision. Also, the public has a legal right to know and comment on what is being proposed. That means a full Environmental Impact Statement (NEPA 1969) is required for each of these projects. An Environmental Assessment (EA) is not adequate. I do recognize that the past year with Covid 19 has been a problem for both agencies and the public. Perhaps that is why these projects were so low profile and only documented with EAs.