

Data Submitted (UTC 11): 10/25/2021 6:00:00 AM

First name: Maria

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Organization:

Title:

Comments: Good Day,

I am writing to comment on the Santa Fe Mountains Resiliency Project and my objects to the current version of the Forest Service's draft environments assessment. I am a member of Audubon Southwest, the Cornell Lab of Ornithology and the UU Santa Fe Environmental Justice Team. As a birder, I walk in the forests around Santa Fe county frequently and am always grateful to observe the beauty of all the flora and fauna that thrive in such a healthy forest with many trees, undergrowth, native plants and other beneficial ecosystems that protect our Earth from climate change. I am saddened to see the destruction of some of these areas by the Forest Service's wrong-minded policies that continue to create worsening conditions for everything that depends on the health of the forest, thus contributing to climate change rather than mitigating it. The Forest Service must stop business as usual practices and re-examine their draft environment assessment of the Santa Fe Mountains and beyond!

I wholeheartedly agree with the comments below put forth by a number of forest advocates and would add that those who choose to build their homes in or near a forest should not be the chief beneficiaries of this type of "resiliency" project. Humans have continually destroyed the natural ecosystems of Earth and this project continues in the same vein.

Thank you,

Maria Spray

Santa Fe resident

1) An Environmental Impact Statement must be completed for the project.

[mdash] A EIS is required when a project has significant impacts on the human environment that is controversial, and when a project damages forest resources

[mdash] A range of alternatives is required. "Action" and "No Action" are not enough. There must be other alternatives, including a conservation alternative. This project is complex and has a substantial impact on the public. A range of alternatives will provide options to find a solution that is acceptable to the public and beneficial for the forest ecosystem.

[mdash] The frequent prescribed burn smoke in the mountains outside of Santa Fe would have a substantial adverse impact on human health. It is in no way proven that prescribed burns substantially replace wildfire or that prescribed burns do not increase the amount of smoke we breathe. In fact, indications are that prescribed burns are largely in addition to wildfire. The Forest Service must do the analysis to determine how much more smoke the public will be breathing as a result of this project, compared to the "No Action" alternative.

[mdash] Widespread and aggressive thinning and burning does not improve the scenic quality of the forest; it degrades it.

2) The condition-based approach should not be used for the analysis of this project.

[mdash] The parameters for treatments are so generalized that we know neither where the treatments will occur nor how they will be carried out in a site-specific way.

[mdash] There are maps that show potential thinning/burning units across the project area, but it is also stated that treatments may be implemented outside of the areas designated on the maps: "The actual location of forest treatments would occur where deemed appropriate at the time of implementation." (Environmental assessment, p. 31)

[mdash] Residents of forest communities want to know if thinning will occur adjacent to communities, and how severely.

[mdash] We need more information about where and how treatments would occur in Inventoried Roadless Areas, which are intended to be preserved in a natural state.

3) The environmental assessment analysis does not use a broad range of the best available scientific information

[mdash] The Forest Service used studies done by scientists that agree with their ecological perspective and virtually none from scientists with a conservation perspective.

[mdash] The areas of the project where thinning and repeated prescribed burning is done will be essentially lacking an understory. There were no references in the environmental assessment to indicate that historical forests had no substantive understory. The existence of an understory is a natural condition at this time, and beneficial to some wildlife species.

[mdash] The analysis over-relies on fire scar studies to reconstruct historical fire regimes, and it provides no discussion of limitations of such studies. Limitations include that the fire scar studies utilized a small number of plot samples, and that trees that burned at high intensity no longer exist. Multiple lines of evidence are necessary.

[mdash] The analysis assumes that proposed fuel treatments will be beneficial to Mexican spotted owls when there are a number of studies calling that into question.

[mdash] There is no analysis of the health effects of the increased amount of smoke the public will breathe due to prescribed burning.

[mdash] There is no analysis that estimates how much smoke that is emitted by wildfire compared with the combination of prescribed burns and wildfire.

[mdash] Burning every 5-15 years is too frequent and does not allow the understory to return.

[mdash] High severity fire is defined in the environmental assessment as over 75% tree mortality, while most studies define high severity fire as 90% tree mortality. As a result, the potential for high severity fire is overstated.

[mdash] Thinning from approximately 500 trees per acre down to 2-50 trees per acre is approaching a clearcut. It leaves the forest too dry and open, can cause leave trees to blow over, and allows the wind to whip between

trees, fanning up flames in a wildfire.

4) The Forest Service has not genuinely included the public in the analysis process

[mdash] The Forest Service has not given sufficient notice of project comment periods. A number of commenters stated in the scoping comments that they did not know about the comment period in time to write thorough comments.

[mdash] The Forest Service only presented science at public meetings that was in accordance with their own ecological perspective.

[mdash] The Forest Service did not allow the public to view any of the over 5,000 public scoping comments online or even in person at Santa Fe National Forest headquarters.

[mdash] Freedom of Information Act (FOIA) requests are often fulfilled by the Forest Service months or even years after the request is made, and often past the time that the FOIA request will be useful to the requestor.

[mdash] The Forest Service has been understating the extent of the project to the public. Forest Service personnel on multiple occasions stated in the media they would only be thinning small trees, when in reality the draft environmental assessment states that larger-sized trees will be thinned.

The Forest Service defines small trees as trees under 9.9" DBH (diameter at breast height), and they propose to thin trees up to 16" DBH.

5) The Forest Service's project planning and analysis must:

[mdash] Include an Environmental Impact Statement, with a full range of alternatives.

[mdash] Greatly reduce the amount of trees removed (leave many more trees per acre) and greatly reduce the number of acres that will be treated. Consider reducing by at least 75%. We need more trees, not fewer, for carbon sequestration and to hold moisture into the forest. Forests that are thinned and/or logged tend to burn more often and at a higher intensity, not at a lower intensity. .

[mdash] Greatly increase time between prescribed burn treatments.

[mdash] Leave most of the forest understory, which is an important part of forest ecology.

[mdash] Close and decommission forest roads which increases fire risk and are damaging to forest ecology. Do not build more roads or improve existing roads, unless there is a critical need to do so.

[mdash] Further analyze impacts of thinning and prescribed burning on Mexican spotted owls. The analysis of this in the environmental assessment is inadequate.

[mdash] Do not masticate trees or understory.

[mdash] Keep cows out of riparian areas, and preferably keep cows out of the project area altogether.

[mdash] Reduce the amount of prescribed burn smoke emitted from the project by at least 75%

[mdash] Do not thin in Inventoried Roadless Areas