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First name: Dyan

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Organization:

Title:

Comments: Ms. Debbie Cress, Forest Supervisor? Santa Fe National Forest

11 Forest Drive

Santa Fe, NM 87508

RE: Scoping comments for the Santa Fe Mountains Landscape Resiliency Project

Submitted by email to comments-southwestern-santafe@fs.fed.us

Friday 29 October 21

Ms. Cress,

As a resident of Santa Fe's Wildland Urban Interface. I live just 100 yards from the forest boundary. I am also a former Forest Service employee on the Malheur National Forest (Region 6). I served as an initial attack firefighter so I have significant firsthand experience on wildfires.

I am deeply concerned about the enormous size of this proposed project, the earlier short comment period allowed to the public. Unfortunately, the repeated response by the Santa Fe National Forest Service employees is that there will be no Environmental Impact Statement regarding its effects on our beloved forest.

The SFMLRP is also of unprecedented size. At 50,000 acres it is one of the largest single vegetation clearing and burning project ever proposed on SFNF's eastside. It took longer, with more public input, to approve the small Railyard Project, in comparison to the 50,000 acres in this project. As evidenced by the two public meetings already earlier held, this project is highly controversial.

The lack of details in the earlier scoping documents and in the draft Environmental Assessment, plus the lack of clarity in answers provided during the public meetings have left the public with insufficient information to submit thoughtful comments at this time. The public must be genuinely included in project planning.

Many in our WUI community are confused. Some are dispirited that their voices don't matter. Residents of our community adjacent to the forest want to know if thinning will occur adjacent to our homes, and, if so, how severely will the forest adjacent to our homes be thinned. The maps in EA are illegible at best and easily misunderstood.

I asked the district rangers to attend a community gathering here in La Canada. They attended. However, our many concerns have not been seriously taken into account. Alas, promises were made and broken. For example, "There will be no feller bunchers used on the proposed project." The EA includes feller bunchers.

Numerous requests that prescribed burning be decreased and health impacts from prescribed burn smoke documented and considered have been ignored and denigrated. and in relation to their request that a conservation approach be taken in the planning of the project.

The condition-based approach must not be utilized in the analysis of this project. Site-specific information must be provided. The sites vary greatly from the area surrounding the watershed to those of us that have homes adjacent to the forest. I understand and appreciate your concern to protect the watershed that provides 40% of the water for Santa Fe. Treat the area surrounding the watershed intensively. The outlying areas far from the

watershed do not need that intensive treatment.

Furthermore, I don't expect consensus amongst all the scientists. However, A broad range of the best available science must be incorporated in the planning and analysis of this project. That has not been done so far. The Agency has chosen to not only ignore but malign the scientists that do not support the Proposed Action. The environmental assessment analysis does not use a broad range of the best available scientific information. It appears that the Forest Service used studies done by scientists that agree with your perspective and virtually none from highly-regarded scientists with a conservation perspective.

The Santa Fe National Forest employees and your contract scientists are continuing to argue that the entire proposed project area needs to be thinned and burned. But, the research of Dr. Chad Hansen and Dr. Jack Cohen shows that the most effective mitigation of damaged property in the event of wildfire is to directly treat around homes and structures. This current conservation science must be considered carefully.

Leading climate scientists with experience in forestry, such as Dr. Dominick Della Salla, PhD, to weigh in during this critical time of massive loss of species, habitat, and plants in the proposed project area. The last thing we need is to cut our carbon sequestering plants. They provide Santa Fe our only buffer against the climate crisis. We truly need every tree we have and every other plant in Santa Fe to help us bring moisture and rain, keep the ground cool as the temperatures rise, and decrease winds and the spread of pests and other parasites on trees that occur with thinning.

So now it is imperative that a comprehensive Environmental Impact Statement, with a full range of alternatives, must be completed for this project. This project is very controversial. The effects on the human environment and forest resources have not been adequately analyzed during the Environmental Assessment process.

The scoping document did not delineate the potential for environmental harm to a host of critical resources, including: (1) inventoried roadless areas (IRAs); (2) high and moderate value wilderness characteristic areas; and (3) endangered species, forest service sensitive species, and critical habitat, leaving the "potential for environmental harm" largely unknown. There is a woefully inadequate coverage of the impact of climate disruption on the forest now and in the coming years.

I would also like you to consider the health of the wildlife and the public when using aerial ignitions containing potassium permanganate, ethylene glycol and diesel fuel and how these are currently affecting our health and well-being. These harmful chemicals also impact the economy, tourism and reputation of Santa Fe as one of the cleanest cities in the country. Many citizens of Santa Fe are complaining about current fires and the health affects (whereas the equally impacted wildlife cannot).

I am also concerned about opening roads (either lightly loaded or inventoried roadless areas) and increasing the exposure of our wilderness to further exploitation by industry which can degrade wildlife habitat, spread invasive species, and allow arsonist and wildlife poachers free access. Many roads in the forest should be completely obliterated, not improved for access.

The following areas of concern were not adequately addressed in your Environmental Assessment.

CLIMATE DISRUPTION From the United Nations website regarding climate change.

"Climate change is the defining issue of our time and we are at a defining moment. From shifting weather patterns that threaten food production, to rising sea levels that increase the risk of catastrophic flooding, the impacts of climate change are global in scope and unprecedented in scale. Without drastic action today, adapting to these impacts in the future will be more difficult and costly."

(<https://www.un.org/en/sections/issues-depth/climate-change/>)

HABITAT - AREAS FOR HABITAT IMPROVEMENT What are some of the pressing issues for habitat improvement that need to be addressed? Please be specific - beavers? Bobcats? Bears?

ESA - MOST PRESSING ENDANGERED SPECIES (ESA) ISSUE(S) What are the most pressing ESA issues that need to be addressed? Mexican spotted Owl? Other threatened species?

MANAGEMENT TECHNIQUES Thinning and prescribed fires? How likely are they to bring about the major changes you seek over time? Do they make sense in light of the realities of climate disruption?

EFFECTIVENESS OF MANAGEMENT TECHNIQUES How effective do you think the management techniques will be? How often do you see needing to repeat them? Are you prepared to repeat the thinning and burning as need? Perhaps every 20-30 years?

WATERSHED Will increase your focus on areas near the watershed? If so, in what way or how? How will you go about balancing your long-term, multiyear-projects with many new and pressing issues that arise?

TOP PRIORITIES Please identify top priorities for treatment in the next three years, what would they be? What factors would you consider when deciding what projects to take on first?

WUI - WILDLANDS URBAN INTERFACE What is your plan for management/treatment around the WUIs?

INVENTORIED ROADLESS AREAS (IRA) What is your plan for management/treatment in IRAs?

INFESTATIONS - MOTHS AND BEETLES What is your plan for management/treatment of pests? Tussocks moths? Bark beetles?

VISUAL BARRIERS AND BUFFERS What are your plans visual barriers and other visual buffers?

ROAD IMPROVEMENTS What are your plans road improvements? Forest Road 79? Forest Road 79W? Ancillary roads? Grading? Widening? How do you plan on getting masticators in the treatment areas?

BUDGET What are your projected budget? What funding sources will you be looking for?

CONTRACTOR AVAILABILITY How available do you think contractors will be? How will you assure that the contractors are indeed documented workers that are fairly treated and adequately paid? Where will the contractors come from? In state? Out of state?

CONTRACTOR OVERSIGHT How do you plan on addressing quality assurance and contractor oversight? How will you oversee the contracts to assure compliance? You will let the contract to the lowest bidder. All too often the lowest bidders use and abuse undocumented workers.

Thank you for your consideration of this matter. Please include this letter as part of the project record. Let me know if you have any questions. Please include me on the list of interested parties.

Thanks for taking the time to review my comments. I look forward to hearing from you in confirmation.

Sincerely,

Dyan Oldenburg