

Date submitted (Mountain Standard Time): 7/8/2019 11:21:51 AM  
First name: Clinton  
Last name: Nagel  
Organization:  
Title:  
Comments:  
Santa Fe Mountains Landscape Resiliency Project

Jul 8, 2019

Forest Supervisor James Melonas

Dear Forest Supervisor Melonas,

Having lived in Santa Fe and enjoyed the mountains and terrain of the Santa Fe National Forest for many years, I want to take this opportunity to comment on this issue. I want to thank you for the opportunity to comment on the Scoping Document for the Santa Fe Mountains Landscape Resiliency Project. In this day and age, any time the public is notified of decisions concerning public lands is a good thing. In that regard, it still does not diminish the fact that I have a number of concerns with the Forest Service's proposal:

1. I agree wholeheartedly that the EA approach is not adequate for a project of this size and scope. Fifty thousand acres is a massive scale that would impact many threatened and sensitive species on forest. There are also issues of old growth forests, roadless areas and streams and riparian areas. Even though it has been several years since I participated in any activities in the Santa Fe National Forest, I can imagine that if this forest is like many others across the west, old growth forests are becoming a more rare entity among the forest landscape. There must be a plan in place to secure these rare ecosystems upon the forests. They provide value to wildlife and to the health of the forest as a whole. They increase biodiversity in both plant and animal worlds. There should be an analysis or inventory of the this forest resource. A thorough, site-specific analysis of all environmental impacts in an Environmental Impact Statement is required.
2. I totally agree that the Forest Service must analyze a full range of alternatives to the agency's proposal, including the Santa Fe Conservation Alternative submitted by WildEarth Guardians and others. I now live on Montana and here the Custer Gallatin National Forest is in the process of analyzing public comment for their Revised Forest Plan. It took a lot of effort and work to do, but it is a necessary requirement. The public needs to have options before them in order to know the possibilities.
3. The Forest Service must identify and implement the minimum road system on a landscape scale and employ a thoughtful, strategic approach to assuring public access while reducing negative impacts from forest roads to water quality and aquatic habitats, and improving watersheds and forest resiliency by returning expensive, deteriorating, and seldom-used forest roads to the wild.
4. The Forest Service must consider the best available science. This is key. Myself and the organization I support here in Montana presented what we thought was the best available science. It should not be ignored. The agency cannot cherry-pick the science and data to support its proposal while ignoring contrary, credible views and data.
5. One issue I learned during my comment period of forest service plans

is the tendency to ignore the facts and science on climate change. Carbon sequester is a real thing and a forested slope is key in fighting the changes from a warming climate. Climate change intensifies the adverse impacts associated with tree thinning, prescribed burning, and roads. The Forest Service must consider the risks of increased disturbance when analyzing the proposed project, as part of the affected environment, and as part of the agency's hard look at impacts.

6. The Forest Service must analyze the cumulative impacts of the proposed project with all other past, present and foreseeable future projects within the broader landscape, including the Hyde Park and Pacheco Canyon projects, livestock grazing, and motorized use.

Sincerely,

Clinton Nagel  
1385 Golden Gate Ave  
Bozeman, MT 59718  
clint\_nagel@yahoo.com

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