

Date submitted (Mountain Standard Time): 6/25/2019 2:19:01 PM  
First name: Garry  
Last name: Taroli  
Organization:  
Title:  
Comments:  
Santa Fe Mountains Landscape Resiliency Project

Jun 25, 2019

Forest Supervisor James Melonas

Dear Forest Supervisor Melonas,

Thank you for the opportunity to comment on the Scoping Document for the Santa Fe Mountains Landscape Resiliency Project. I appreciate the Forest Service soliciting public comment on this project, but have a number of concerns with the Forest Service's proposal:

1. An EA is inappropriate for a project of this scale and complexity that impacts many threatened and sensitive species, old growth forests, roadless areas and streams and riparian areas. Because this project will have significant impacts to these and other resources, a thorough, site-specific analysis of all environmental impacts in an Environmental Impact Statement is required.
2. 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.
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. The agency cannot cherry-pick the science and data to support its proposal while ignoring contrary, credible views and data.
5. Climate change intensifies the adverse impacts associated with timber harvest, 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,

Garry Taroli  
15 South Franklin Street  
Wilkes Barre, PA 18711  
gtaroli@rjglaw.com