

Date submitted (Mountain Standard Time): 7/11/2019 10:02:34 AM
First name: James
Last name: Melonas
Organization:
Title:
Comments:
FW: Scoping Comment - Santa Fe Mountains Landscape Resiliency Project

James E. Melonas
Forest Supervisor

Forest Service

Santa Fe National Forest

p: 505-438-5312
f: 505-438-5391
james.melonas@usda.gov <mailto:james.melonas@usda.gov>

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Santa Fe, NM 87508
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<<http://usda.gov/>> <[https://twitter.com/forestservice](https://twitter.com/forestsservice)> <<https://www.facebook.com/pages/US-Forest-Service/1431984283714112>>

Caring for the land and serving people

From: Sara Smith [<mailto:ssmith@santafecountynm.gov>]
Sent: Thursday, July 11, 2019 9:56 AM
To: Melonas, James -FS <james.melonas@usda.gov>
Cc: Anna C. Hansen <ahansen@santafecountynm.gov>
Subject: FW: Scoping Comment - Santa Fe Mountains Landscape Resiliency Project

Good Morning James,

Commissioner Hansen submitted the attached comments and resolution yesterday afternoon at 4:39 p.m. (email below). She was notified this morning that the email address is not correct. Please confirm receipt of her comment for consideration by the deadline. Thank you in advance!

Sara Smith

Constituent Services Liaison

505-986-6263

From: Sara Smith

Sent: Wednesday, July 10, 2019 4:39 PM

To: 'comments-southwestern-santafe@fs.fed.us' <comments-southwestern-santafe@fs.fed.us
<mailto:comments-southwestern-santafe@fs.fed.us> >

Cc: Anna C. Hansen <ahansen@santafecountynm.gov <mailto:ahansen@santafecountynm.gov> >

Subject: Scoping Comment - Santa Fe Mountains Landscape Resiliency Project

Please find attached, Santa Fe County Commissioner Anna Hansen's scoping comment for the Santa Fe Mountains Landscape Resiliency Project and two related resolutions from the Santa Fe County Board of County Commissioners.

Sincerely,

Sara Smith

Constituent Services Liaison

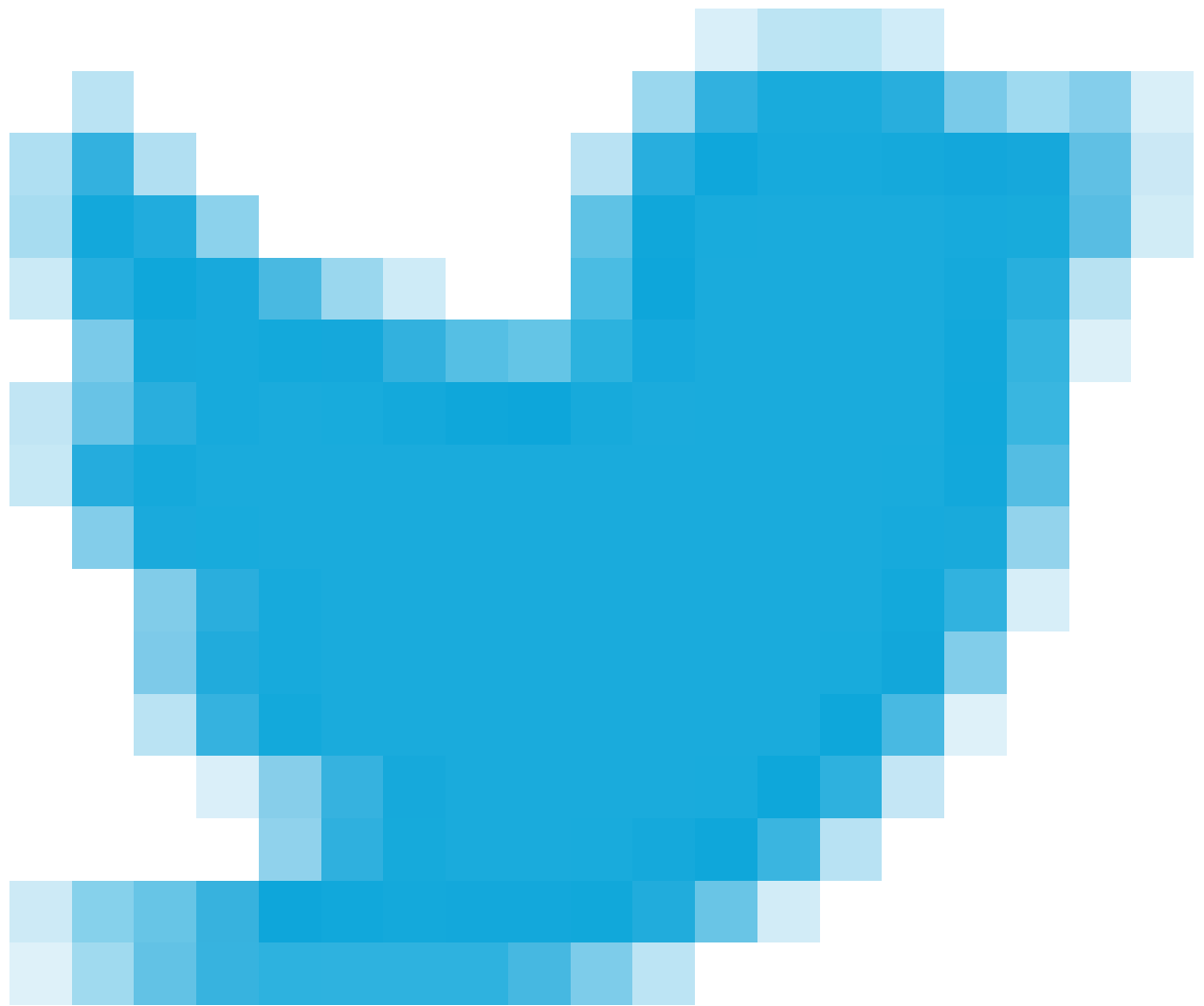
Santa Fe County Commissioner Anna Hansen District 2

505-986-6263

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P Conserve resources



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**BOARD OF COUNTY COMMISSIONERS
OF SANTA FE COUNTY
RESOLUTION NO. 2010- 110**

INTRODUCED BY:

Commissioners Holian and Montoya

A RESOLUTION

**ENDORISING WILDERNESS DESIGNATION FOR THE INVENTORIED
ROADLESS AREAS ADJACENT TO THE PECOS WILDERNESS**

WHEREAS, the U.S. Forest Service has inventoried Forest Service Roadless Areas adjacent to the Pecos Wilderness, some of which are in Santa Fe County; and

WHEREAS, the Roadless Rule of 2001 generated hundreds of thousands of public comments, and 600 public hearings across the country with the majority of Americans in support of the Rule; and

WHEREAS, these public lands are national treasures, prized by New Mexicans and the people of Santa Fe County for the quality of life they bestow; and

WHEREAS, these public lands provide significant economic benefit to our community in the form of tourism, real estate value, influx of new residents and businesses and activities directly related to their use and enjoyment; and

WHEREAS, all of the above-mentioned economic benefits directly result in a significant tax base for Santa Fe County; and

WHEREAS, these public lands provide exceptional recreation and scenery, key to the culture and custom enjoyed by residents of Santa Fe County and critically important to current and future generations; and

1 **WHEREAS**, these public lands in their natural condition provide many benefits
2 including clean and abundant water supplies, clean air, and superior wildlife habitat; and

3 **WHEREAS**, New Mexico was the home of the first Gila Wilderness in the United
4 States; and

5 **WHEREAS**, New Mexico has fallen behind other Western states, and currently only 2%
6 of New Mexico's acreage is designated as Wilderness, compared to 6% in Arizona, 15% in
7 California, 6% in Colorado, 9% in Idaho, 4% in Montana and 5% in Wyoming; and

8 **WHEREAS**, Wilderness designation allows grazing, hunting and fishing, hiking and
9 horseback riding; and

10 **WHEREAS**, these unique Roadless Areas, with their special landscapes, can only be
11 permanently protected by Federal designation as wilderness areas;

12 **NOW, THEREFORE, BE IT RESOLVED** that the Santa Fe County
13 Commissioners support Wilderness designation for the inventoried Roadless Areas,
14 which are adjacent to the Pecos Wilderness.

15 **AND BE IT FURTHER RESOLVED** that a copy of this Resolution be sent to the
16 Governor of New Mexico, the New Mexico Congressional Delegation, and any other
17 interested party.

18
19 PASSED, APPROVED, and ADOPTED this 29 day of June, 2010.

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24 ATTEST:

[Signature]
HARRY MONTOYA, CHAIR


25 *[Signature]*
26 VALERIE ESPINOZA, SANTA FE COUNTY CLERK



SFC CLERK RECORDED 06/30/2010

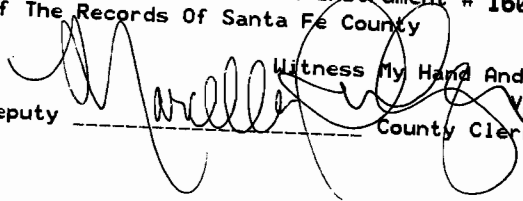
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APPROVED AS TO FORM:


STEPHEN C. ROSS, SANTA FE COUNTY ATTORNEY

Jp/ca/jpmb/2009 res/solar energy agreements



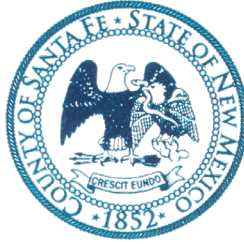
COUNTY OF SANTA FE) BCC RESOLUTIONS
STATE OF NEW MEXICO) ss PAGES: 3
I Hereby Certify That This Instrument Was Filed for
Record On The 30TH Day Of June, 2010 at 02:45:20 PM
And Was Duly Recorded as Instrument # 1603071
Of The Records Of Santa Fe County
Deputy  Witness My Hand And Seal Of Office
Valerie Espinoza
County Clerk, Santa Fe, NM



Henry P. Roybal
Commissioner, District 1

Anna Hansen
Commissioner, District 2

Rudy N. Garcia
Commissioner, District 3



Anna T. Hamilton
Commissioner, District 4

Ed Moreno
Commissioner, District 5

Katherine Miller
County Manager

Supervisor James Melonas

Santa Fe National Forest Service

RE: This is a scoping comment for the Santa Fe “Mountains Landscape Resiliency Project”

Dear Supervisor Melonas,

I have three overarching issues with the SFMLR Project:

1. The 30-day comment period, held over both the 4th of July holiday and as the State ends its fiscal year, is inadequate for any serious attempt to grapple with, and understand the implications of, your proposal to burn 43,000 acres of the Santa Fe National Forest after cutting/thinning 21,000 acres. My constituents say even those in county communities that will be directly affected have not been notified directly, or in neighborhood meetings or postings, and that most people they know are completely unaware of your proposed actions. This 30-day period is certainly inadequate for the County to examine the impacts of a project of this scale and magnitude on Santa Fe County and its future sustainability. Please extend it.
2. A mere EA is not sufficient for a forest Project of this scale, complexity and scope. It is clear that because of direct impacts on one of NM’s largest populations, a full Environmental Impact Statement is necessary – I hereby request one be started as soon as possible.
3. This project plan is quite appalling in its lack of all relevant detail except for acreage, especially given its enormous scale and the potential for catastrophic unintended consequences. Until the proposal states the locations as well as the treatment types and acreages, as you stated you would in your December pre-scoping meeting, it is impossible to evaluate the merits of your plan. With no detail and 50,000 acres to make permanent bad decisions in, this proposal cannot be adequately commented upon and my Scoping Comment is incomplete due to your lack of actual planning and public communication. Please release a site-specific project plan that can be realistically evaluated by experts, citizenry, the City, the County, and the State.

Further, I request that you formally assess, evaluate and analyze all of the following issues and topics and make your findings directly accessible to the public.

-all impacts on water, hydrology, and hydrogeology from this project or anything connected with it and both surface water quality and non-surface water quality;

102 Grant Avenue · P.O. Box 276 · Santa Fe, New Mexico 87504-0276 · 505-986-6200 · FAX:
505-995-2740 www.santafecountynm.gov

-all impacts on air quality, including readings of radionuclides we would be exposed to by the burning of old growth forest that you intend, and data from the DOE which monitors such radioactive hazards – what are the increased likelihoods of cancer, respiratory diseases, or other diseases and health toxicity from the smoke? Is the Forest liable for these increased risks that can be correlated and for which they may be sued, along with other hazards, such as:

-all impacts from any additional chemicals or treatments used, whether herbicides or the potassium permanganate/antifreeze combination used for aerial ignition. What studies document their safety?

-all impacts on soil and other measures of forest viability. For instance, large masticators and other machinery used by the FS in any of its treatments can cause soil compaction, hydrological runoff issues and induce sedimentation in our surface water flows.

-all impacts on wildlife, including all listed species; how will the frequent presence of fire across the SFNF impact the mating, breeding, and thriving of these species?

-All impacts on habitat for such species, on biodiversity in general, and on the integrity of the ecological network of these forests.

Further questions the County would like assessed, evaluated, and analyzed by the Forest Service, with findings provided to us, in order to sufficiently evaluate their proposed plan:

What is the increased likelihood of fire due to your resurfacing of 94 miles of roads-- allowing people to drive more easily deeper into the heart of the forest is a known increased fire risk? What is the increased risk of fire due to all Forest Service presence/their contractors side activities and increased presence in the forest? In other words, what is the relative risk of fire when roads are built and the Forest Service ‘treats’ the forest, versus the untrammled and roadless wilderness it is supposed to be? How do you account for many findings in which the best response and the best recovery from fire is in the areas *least* treated by the Forest Service?

What is the likelihood of an uncontrollable fire from your many prescribed burns, as has already happened on the western SFNF?

What reduction in ecosystem services currently provided to the city of Santa Fe by the forest, do you expect, based on actual scientific calculations? Have you informed the city and its water customers that you are decreasing water capture by the forest by burning thousands of acres, by almost every metric and measure? How do you make up to the city for the cost of decreased water generation by the forest as a formal ecosystem service?

Have you done a cost/benefit analysis of the various treatments you have found, especially given the risk of uncontrolled fire with every start that you make?

What model of risk assessment was used and will be used to determine areas and treatments? Please provide scientific references and the actual risk assessment technical model that was used. How successfully has this risk assessment been shown to be both generally true and specifically true when used to assess the odds of a wildfire becoming devastating versus the desired certainty of many fire starts by you, the Forest Service?

What possible offsets do you have to make up for the massive release of carbon from deliberately burning it? If this becomes a fining offense and burning carbon must be paid for, how do you propose to do that?

Why are you not focusing on mitigation and true adaptation to our biggest threat: climate change? Why not focus on the realities of our changing weather and how we save trees adapted to our future higher temperatures – which is already a certainty – rather than adapt trees or forest to fire which is NOT certain?

Forest Service personnel at various conferences have noted that they expect Santa Fe to look like El Paso or certainly become high desert like Albuquerque in the near future - doesn't this assumption bias how valuable you perceive our forests and even individual large trees, to be? Please make clear the Forest Service's assumptions about how climate change will impact the SF National Forest over the next 10-15 years.

The serious impacts of your proposal and their wide-reaching impact on our future here in terms of water, temperature, rainfall, weather volatility, etc. do not appear to have been studied by the Forest Service. Yet these actions are likely permanent in nature due to the increase in temperature and changing habitat for our trees, which will not have the same conditions for seedlings to grow into a forest.

Given that the MOST RECENT* science speaks of reforestation as our primary imperative on the forests, I therefore ask you to reconsider other approaches than so much prescribed fire, and urge you to hold meetings with all affected neighborhoods in the county, including and especially our historical communities along the Forest boundary. This level of action in the Forest will interfere with County business to a notable degree but with no specific location detail on your actions, we cannot determine how much this would cost in terms of risk, water, funding, health and safety issues, and many other issues and problems your proposal does not address.

I therefore ask you to include site-specific actions in this proposed Project, rather than the 'conditions-based' approach you have outlined, which does not allow us to evaluate the real risks, costs and benefits of this project to Santa Fe County, and to submit that plan to us for true scoping comments. Please take the very latest science into consideration of the irremediable large-scale thinning and burning you propose in the SFMLR Project plan.

I am requesting that I have “Coordination” status as County Commissioner and have a seat at the table so that our policies are followed and our constituents are recognized. While these comments are my own as an individual County Commissioner, the Santa Fe County Board of Commissioners passed two resolutions related to the Fireshed and this project. Please find those enclosed.

Sincerely,



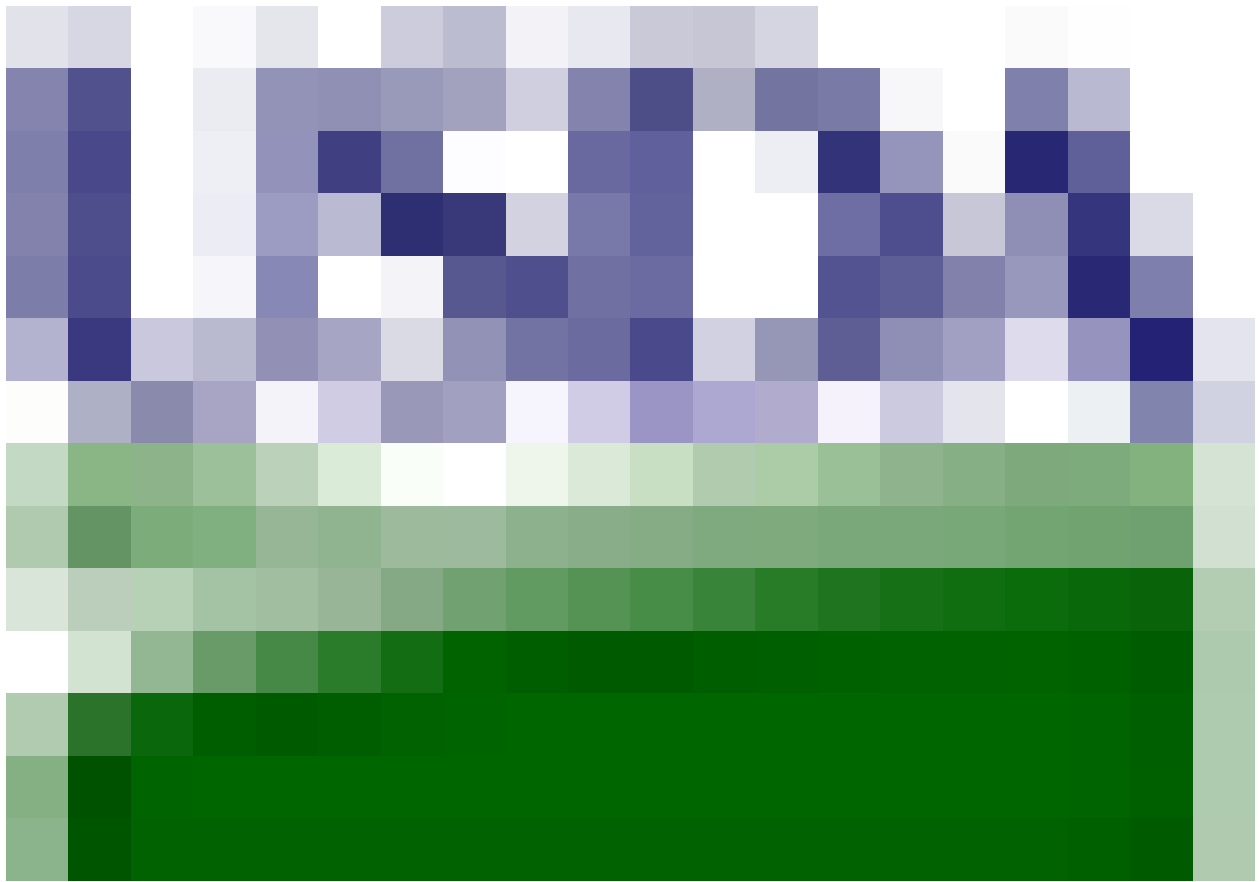
Anna Hansen
Santa Fe County Commissioner District 2

* Jean-Francois Bastin, Yelena Finegold, Claude Garcia, Danilo Mollicone, Marcelo Rezende, Devin Routh, Constantin M. Zohner, Thomas W. Crowther. **The global tree restoration potential.** *Science*, 2019; 365 (6448): 76 DOI: [10.1126/science.aax0848](https://doi.org/10.1126/science.aax0848)

Dumroese, R. Kasten, et al. "A national approach to leverage the benefits of tree planting on public lands." *New forests* 50.1 (2019): 1-9

Mader, Sebastian. "Plant trees for the planet: the potential of forests for climate change mitigation and the major drivers of national forest area." *Mitigation and Adaptation Strategies for Global Change* (2019): 1-18.





**THE BOARD OF COUNTY COMMISSIONERS OF
SANTA FE COUNTY
RESOLUTION NO. 2019 – 53**

A RESOLUTION URGING THE UNITED STATES FOREST SERVICE TO CONDUCT A
COMPREHENSIVE ENVIRONMENTAL ANALYSIS IN ACCORDANCE WITH THE
NATIONAL ENVIRONMENTAL POLICY ACT PRIOR TO COMMENCING THE SANTA
FE MOUNTAINS LANDSCAPE RESILIENCY PROJECT

WHEREAS, the United States Department of Agriculture Forest Service (Forest Service), along with the Greater Santa Fe Fireshed Coalition (Coalition), has designated 168 square miles (107,520 acres) of National Forest and private lands in northeastern Santa Fe County and surrounding areas as the Greater Santa Fe Fireshed (Fireshed); and

WHEREAS, the Coalition's mission is to use a proactive, collaborative approach to improve the health and long-term resilience of forested watersheds and communities by addressing wildfire; and

WHEREAS, the Fireshed is a focus for mechanical thinning of trees and other vegetation and prescribed burning in order to reduce fuels and protect resources including critical water sources; and

WHEREAS, the Fireshed provides recreation and outdoor enjoyment to more than 100,000 Santa Fe County residents and thousands of visitors each year and is home to the Santa Fe Ski Basin, Hyde Memorial State Park, Santa Fe Municipal Watershed, portions of the Pecos Wilderness and Tesuque and Nambe Pueblos, extensive inventoried roadless areas and high value habitat for breeding birds and other wildlife; and

WHEREAS, the Forest Service is in the early stages of planning a 50,000-acre forest resiliency project within the Fireshed called the Santa Fe Mountains Landscape Resiliency Project, during which the likelihood of substantial impacts will be determined; and

WHEREAS, the Santa Fe County Board of County Commissioners (Board) passed a resolution in 2010, Resolution No. 2010-110, in support of Wilderness designation for Inventoried Roadless Areas which are adjacent to the Pecos Wilderness that may be impacted by the Santa Fe Mountains Landscape Resiliency Project; and

SFC CLERK RECORDED 04/10/2019

WHEREAS, the Forest Service is part of the Fire Research Consensus project that includes collaboration between the University of California, The Nature Conservancy, the USGS, the Forest Service and others, and in 2017 published a “Consensus Statement on the role of wildfire in forested landscapes of the western United States” that can inform the proposed Santa Fe Mountain Landscape Resiliency Project; and

WHEREAS, National Environment Policy Act (NEPA) is our national charter for the environment, intended to help public officials make decisions based on comprehensively understanding environmental consequences before actions are taken and mandating, to the fullest extent possible, citizen involvement in such decisions; and,

WHEREAS, the Project may have a significant effect on the environment and should not qualify as a categorical exclusion under NEPA; and

WHEREAS, under NEPA, “significance” requires consideration of both context and intensity of potential effects, 40 CFR 1508.27; and

WHEREAS, context refers to the geographic, biophysical, and social context in which effects would occur, and intensity refers to the severity of impact, and includes consideration of a number of variables, such as effects on public health and safety, potential for adverse effects on threatened and endangered species, the degree to which effects are uncertain, and others; and

WHEREAS, the NEPA analysis process must include analysis of the direct, indirect, and cumulative impacts of the Project on a variety of resources, including the impacts of the prescribed burning on air quality and public health, threatened and endangered species, inventoried roadless areas, water quality, soils, vegetation and wildlife; and

WHEREAS, unless the Forest Service determines at the outset that a full environmental impact statement (EIS) is necessary to analyze the Project’s impacts, the Forest Service should complete a thorough environmental assessment and, if warranted by the findings of the EA, a full EIS; and

WHEREAS, the Board understands that the Forest Service is committed to conducting substantially more public outreach than what is necessarily required under its NEPA regulations.

NOW, THEREFORE, BE IT RESOLVED by the Board as follows:

1. The Board supports and encourages the Forest Service to conduct a comprehensive and objective NEPA analysis prior to commencing the Santa Fe Mountains Landscape Resiliency Project.

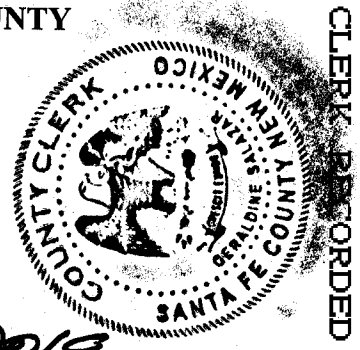
2. The Forest Service should provide effective notice to the public through multiple means, conduct public outreach, and assure that the public is otherwise well-informed about the proposed Project and has multiple and convenient opportunities to fully participate in the NEPA process.

3. The Forest Service should complete the NEPA analysis, which should incorporate a broad range of forest and fire ecology research and an evaluation of all reasonable alternatives to the proposed Project, before taking any action in the Fireshed.

PASSED, APPROVED, AND ADOPTED ON THIS 9th DAY OF APRIL, 2019

THE BOARD OF COUNTY COMMISSIONERS OF SANTA FE COUNTY

By: Anna T. Hamilton
Anna T. Hamilton, Chair



ATTEST:

Geraldine Salazar Date: 4-9-2019
Geraldine Salazar
Santa Fe County Clerk

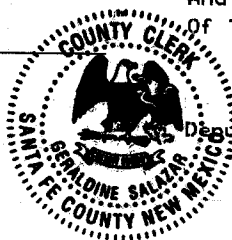
Approved as to form:

R. Bruce Frederick
R. Bruce Frederick
Santa Fe County Attorney

COUNTY OF SANTA FE)
STATE OF NEW MEXICO) ss

BCC RESOLUTIONS
PAGES: 3

I Hereby Certify That This Instrument Was Filed for
Record On The 10TH Day Of April, 2019 at 10:12:38 AM
And Was Duly Recorded as Instrument # 1883444
Of The Records Of Santa Fe County



Witness My Hand And Seal Of Office
Geraldine Salazar
County Clerk, Santa Fe, NM

Estrella Martinez
Deputy

SFC CLERK RECORDED 04/10/2019