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Organization:

Title:

Comments:

I am writing to object to the Santa Fe Mountains Landscape Resiliency Project and the very large prescribed burn that is part of it. It is my understanding that this project is going forward without an Environmental Impact Study which I strongly request. Any project of this scope is likely to have unintended consequences when not carefully planned.

I am very concerned for the young wildlife sheltered in the forest at this time of year. Also for the plant life that in our climate takes a very long time to reestablish. Resiliency gets harder and harder as our climate challenges get larger and larger. Even after what was a wetter than our recent normal winter, we are dry now. Smaller more measured, targeted efforts of "management" are likely to reap bigger benefits.

The following recommendations were developed by respected environmental stewards who share the same goals as your agency and the good work that you do. You have probably seen these recommendations before and I submit them again in a spirit of collaboration, not challenge. Thank you for all that you do.

Santa Fe Conservation Alternative (SFCA): Recommendations

The "desired conditions" of the SFCA are as follows:

- 1) Require a site specific plan for each project within the SFMLRP that strategically targets limited areas to treat, creates buffered boundary areas to protect property and access ROWs, and safety zones to protect lives;
- 2) Require that riparian areas and critical wildlife habitat receive additional restoration monitoring and mitigation procedures developed in collaboration with NM Department of Game and Fish; and,
- 3) Encourage public input regarding preservation of places, landscapes, cultural sites and landmarks of local significance.

Thinning

(Note: Projections for post treatment density are: 165.05 TPA across treatment stands - 4.0"+ DBH. 29.3% of stands are >81 TPA and 90.3% of stands have >52% trees <16" DBH.)

-Limited hand thinning (up to 9") only in dry pine and mixed conifer outside of IRAs

-Stumps cut down to the ground

-No thinning adjacent to the WUI for the purpose of protection of structures or communities except within 150 feet of structures, and for fire fighter safety zones. -Maximum trees removed in most thinned areas to 80 BA

-Leave tree groupings (50% minimum) and maintain a shrub understory. Utilize a wildlife habitat based determination of tree and vegetation retention

-Identify riparian area concerns and plan to protect from erosion or sedimentation Slash management

-Pile burning of activity fuels

-Reevaluate slash management timing and methods to avoid potential bark beetle outbreaks, and sterilization of soil under slash piles. No slash over 3" left on the ground during the dry season

Prescribed burning

-Utilize managed wildland fire and pile burning wherever possible. Utilize minimal broadcast prescribed burns only in areas that are not assessable for pile burns.

IRAs

-No thinning in IRAs

-Identify Roadless Area concerns and develop policy to restore

Monitoring (Essential method of reaching desired outcomes of healthy forest habitat and protection of public health)

-Set aside test plots for monitoring purposes

-Soil sampling - plot number and spacing to be determined

-Baseline species evaluation (i.e. population capacity and presence/absence) - Improved air quality standards and monitoring to protect sensitive (human) population

Reclamation and restoration

-Reclamation of any USFS roads deemed unessential in Travel Management Plan -Hand build structures (ex. Zuni bowls) in arroyos to slow flood waters -Planting native, stream side vegetation where appropriate to slow floodwaters -Reintroduction of beaver where appropriate

WUI and community forests

-Develop program to support fire-proofing of structures and surrounding 100 feet, at least through increased outreach and education (County should make this a homeowner responsibility)

-If possible, support development of an alternative egress for communities with a single egress

-Leave most areas accessible to the public for recreation

-Take into account local opinion to preserve areas that are special to communities, like Cougar Canyon

-Increase law enforcement to protect against unsafe fire behavior by forest visitors

Scenic quality

-Maintain the scenic quality of treated areas. Develop a standard for acceptable scenic quality with local input

Submitted to SFNF Supervisor James Melonas, May 16, 2019.

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