

July 5, 2019

Mr. James Melonas
Forest Supervisor, Santa Fe National Forest
11 Forest Drive, Santa Fe, NM 87508

Re: Scoping Comments for the Santa Fe Mountains Landscape Resiliency Project

Dear Mr. Melonas,

As a resident of Santa Fe, I am very concerned about this project and wish to add my voice to those asking you reconsider the approach the Forest Service has embarked upon. **I oppose the current plan as it stands**; it leaves too many questions unanswered.

The following are some of my concerns, though by no means all of them:

- There's been no **Environmental Impact Statement** as required by law for a project of this size.
- **Public health**: exposure to small particulate matter in smoke, and the cumulative effects of exposure of people and wildlife to toxic fire accelerants.
- **Economy**: Declining air quality will be detrimental to our local economy, outdoor recreation, tourism and the cultural landscape.
- **Science** has developed over the past fifty years: there are significant questions about the long-term effects of cutting and burning on the scale proposed.
- **New or improved roads** should not be permitted in what should be considered a Wilderness Area.
- The proposed work in the current plan will have **harmful effects on our water supplies, will degrade wildlife habitat**, and create countless unintended consequences.
- The effects of such short-sighted thinking on **climate change**. The devastating loss of carbon-sequestering plant species, the loss of cooling plant cover, the loss of natural barriers to drying winds and pests, and the loss of species habitat are all contrary to the direction we need to be going to deal with the current global climate trends.

The consequences of the current plan will be enormous and difficult for those of us who will have to live with them. **Please extend the too-short comment period, incorporate some current scientific points of view, and significantly revise this plan.**

Sincerely,

Greg Walke, Architect
1934 Hano Road
Santa Fe NM 87505



QUESTIONS FOR THE SANTA FE MOUNTAINS LANDSCAPE RESILIENCY PROJECT



CLIMATE CHANGE

- What science and studies are you using to understand the impacts of cutting the carbon sequestering forests of Santa Fe?
- Are there other plans to offset the release of carbon during the cutting and burning of the Santa Fe forests?
- What is the science or justification for opening tree canopies and further warming our soils when we are in a severe drought and will further increase local temperatures?
- Have you considered the science (Dr Chad Hansen) showing high intensity fires actually emit less carbon into the atmosphere than low intensity fires?

PUBLIC HEALTH

- Who is monitoring the impacts on the public of the smoke during burns of the forest?
- We would like a trained member of the public to monitor the burns and have full access to the data regarding emissions.
- Have you done a full assessment of the health implications after the use of potassium permanganate and the release of other toxicants into the atmosphere, water, and soils after the forest burns?
 - If yes, we would like access to that data.

INVENTORIED ROADLESS AREAS (IRA'S)

- Describe, in detail, the location and extent of all IRA's and Lightly Roaded Areas (one mile or less of road per square mile). Specifics are needed, not the generalities of the Scoping document.
- How will the access into the IRA's with this project impact those areas?
 - on wildlife habitat
 - further road development and improvement
 - access by ATV's
 - access by extractive industries (oil, gas, mining, logging)
- How will this access impact the future eligibility for Wilderness designation?
- How will the area's absence of commercial logging and road building be considered in this project?
- IRA's contribute significant assets to the social, economic and ecological with priceless value. How is your office analyzing the effects on these assets for the Santa Fe forests?

WILDLIFE HABITAT AND ENDANGERED SPECIES

- Why are the burns in Pacheco Canyon, Jemez, etc. done during nesting season?
- Why are aerial bombings done? The animals cannot escape and toxic potassium permanganate is spread throughout their habitat.
- What do you mean by improvement of habitat in your project plan? What species? What habitat? Current photographs of 'treated' areas do not show improved habitat or diversity of plant or animal species.
- What are the Threatened or Endangered Species in this project area, other than the Mexican Spotted Owl? (NOTE: every species living in those areas are severely threatened and with the drought conditions life is already very stressed for these animals. Therefore, all species should be considered 'endangered')
- How do these proposed actions actually improve the ecology of our forests? How exactly? What evidence do you have for that?
- Are you accounting for the damage to the 'small animal' damage of large weighted machines (masticators, etc) on the soils and the mycorrhizae, the root structure and all insects that are a valuable part of a complex ecosystem?
 - Who are the soils scientists studying this before and after the 'prescriptions?'
 - We would like the public to have access to this data.
- Does this project account for any Federal, State, or local laws or requirements for the protection of habitat and species?
 - We would like the public to have access to these requirements and to the specific data from other thinning and burning in the past showing the justification of 'improvement.'

- Where can the public view wildlife population and health surveys? Including migratory songbirds, endangered species, management indicator species and apex predators (coyote, bear, etc).
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ANCIENT, OLD-GROWTH FORESTS

- How will this project and plan fulfill the legal requirement of a minimum of 20% of the area to be designated as old growth be achieved?
 - Where exactly will these areas be located? Please show on a map.
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MONITORING OF CONTRACTS

- Who will be monitoring the contracts, the contractors, the employees as they proceed with the thinning and burning?
 - Who is responsible, accountable for the correct execution of the contracts?
 - We would like to see the approval check lists before, during and after the execution.
 - Are the contractors from in-state, out-of-state?
 - Where are their employees from? Local, out-of-state, out-of-country?
 - What sort of penalties for violation of the contract specifics?
 - if rare trees are cut
 - if oversized trees are cut
 - if burn piles damage surrounding trees, habitat, sterilizing soil
 - Who is monitoring violations such as:
 - cutting rare trees not on the contract list
 - cutting larger trees than allowed
 - piles too large, wide and high
 - burning live standing trees during pile burning
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CONTROVERSY OF SCIENTIFIC INFORMATION

- How and when will the views and research of other scientist be considered, evaluated, and included in this project? Those areas include:
 - historic forest conditions and fire regimes
 - impacts of high severity fires
 - lack of effectiveness of time-limited treatments
 - risk assessments
 - how treatments impact fire behavior
 - climate change and carbon sequestration needs
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DROUGHT CONDITIONS OF THE WEST

- How is the severe drought we are currently experiencing being considered in the proposal?
 - How is the Santa Fe forest considered for it's uniqueness during the drought and this project? Considering for:
 - lowered rainfall and snowfall
 - increased winds
 - elevated ambient temperatures
 - How is this proposal truly different for Santa Fe, not a one-size-fits-all for other parts of the country?
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OUTDOOR RECREATION AND TOURISM

- How does this proposal account and assess the effects on our outdoor recreation in the Santa Fe National Forest?
- What are the economic and public health effects of smoke tally on tourism and recreation?
- How is the Department of Tourism and Development monitoring these effects with the Forest Service?