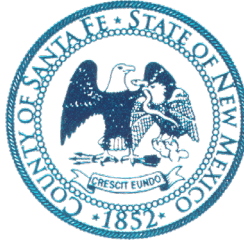


Henry P. Roybal
Commissioner, District 1

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;

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-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 untrammelled 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.