

Date submitted (Mountain Standard Time): 7/10/2019 10:16:43 AM

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Organization:

Title:

Comments:

Santa Fe Mountains Landscape Resiliency Project

Thank you for this opportunity to comment. I am commenting as an individual, though to avoid unnecessary repetition I highly recommend and adopt by reference the attached comments by Rachel Jankowitz, the Conservation Chair of the Native Plant Society of New Mexico. The Forest Service is to be commended for undertaking this long term effort to restore forest health. I believe that prescribed burns and forest thinning are necessary tools, properly used, to achieve that goal.

Additional comments and questions I wish to make are:

1. Livestock Grazing: What acreage and in what areas are existing permits? What are the plans for future grazing permitting, especially with increased patches of meadows contemplated by this project?

2. Post thinning and prescribed burn monitoring: while monitoring the outcomes of individual projects is implied, I believe that the requirement should be explicit. Especially important is the determination whether invasive and non-natives colonize burned or thinned areas. Followup practices to deal with those invasive should also be standard. Also, soil sampling in areas covered by burned slash piles should be done to determine the effects of the intense burns and the results, if adverse, should be used to give preference to scattering the thinning debris, rather than burning piles.

3. Public Outreach: Continuation of the USFS and the Fireside Coalition's public education and outreach practices should be continued, as well as the alerts given for individual prescribed burns. At some point in the EIS process consideration should be given to conducting a public debate of scientists with opponents of burns and thinning, some of whose claims I believe are misleading to the public. While coping with climate change is the impetus for this Project, the anti-environmentalist stances of the present national administration has enhanced skepticism and distrust of federal agencies. Though perhaps giving legitimacy to unfounded claims, such a public debate, widely attended and publicized, would allow the public to understand the issues better and accept the science on which this Project is based.

4. Legal Status of Individual Prescribed Burn & Thinning Projects: This SFML Resiliency Project contemplates many individual projects conducted over 10 to 15 years with those projects determined by experience, catastrophic wildfire risk and funding. Assuming an EIS or EA is adopted for this Project, under what legal authority will the individual projects be conducted?

USFS has made a good effort to explain the NEPA process. Despite that, there is much public confusion with the clamor for an EIS and uncertainty about the alternatives to it. Until I read Judge Parker's recent decision approving the USFS' Hyde Park and Pacheco prescribed burns (copy attached), I realized I did not understand by what authority those burns were to be conducted. Is the decision-making for the individual projects to be in accord with the legal framework in that opinion? While the intricacies of the relevant body of law can be overwhelming to most, making that decision, and the results of the current appeal of it, and the legal rationale for individual projects available to the public can dispel at least some of the public confusion.

Sincerely,

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