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Title:

Comments:

I have many objections to the current proposed Santa Fe "Mountains Landscape Resiliency" Project as discussed with myself and others concerned at the public meeting in June.

A 30-day comment period for a project of this scope, proximity to heavily populated WUI areas, and potential consequence is absurd. The period is barely long enough for anyone affected to hear of this, much less develop and voice an opinion. This period absolutely must be extended, substantially.

We are seeing current, substantial, increasing and incontrovertible consequences of what climatologist friends of mine are referring to as Extreme Climate Instability, otherwise known as Climate Change. Given the numerous unknowns regarding potential changes to seasonal weather patterns for the Santa Fe Forest area under a changed climate regime, it is abundantly clear that an Environmental Assessment is not adequate for this project. This project demands a full Environmental Impact Statement.

Related to this, the current Federal Administration has declared on numerous occasions it does not consider Climate Change to be an issue, or even admit to its reality, despite the overwhelming scientific evidence to the contrary. This same administration has instructed its agencies to avoid the use of even the term Climate Change, much less take any potential consequences of such change; how then can the communities affected have any confidence that the current Project Plan is taking into account how altering the composition such a large area might alter or exacerbate the effects of Climate Change? I insist that no project move forward without current, sound science -- that includes climatological science - to back up the planned actions and acreages. I have seen no evidence that that is the case currently; the science referenced is all over 10 years old and does not reference Climate Change nor take it into account. As such I request that this Project not be rushed nor prioritized by the USFS until it reviews current science and offers something other than verbal assurances that Climate Change will be taken into account in decisions regarding the execution of this project. To expand on that, I would like to formally request that you evaluate, analyze and assess all of the following factors and that the results of those evaluations, etc. have influence in the Project Plan:

- * Impacts on local air quality from planned prescribed burn activities, and potential increases to local health hazards as a result? Are those health hazards identified and listed, as well as being taken into account? Given the proximity to so many people this must be considered.

- * Impacts on water, including water quality, as a result of runoff from burned areas.

- * Impacts on hydrology from both the planned actions of the project as well as related activities, such as the proposed resurfacing of 94 miles of roads.

- * Regarding this resurfacing, I would like to know why the USFS considers this resurfacing a good use of its surely scarce resources? Resurfacing is expensive and increases the likelihood that the road will be utilized, which increases the traffic into those parts of the forest, which increases the likelihood of accidental fire. It seemed to me at the public meeting that it makes more sense to close or even decommission more roads than the meager couple miles mentioned, especially in contrast to 94 miles of resurfacing. This makes no sense to me and I wish to know the justification for this part of the plan.

- * What is the potential increase in fire risk due to the increased presence of Forest Service personnel and their contractors, masticators, chainsaws, etc.?

- * What is the risk of a fire going out of control, given so many prescribed burns? It seems that numerous burns increase the likelihood that one will go awry.

- * Has any risk/benefit analysis been done for the various treatments? Especially given the risk of one of the many prescribed fires going wild - a possibility perhaps made more likely given the uncertainties of Climate Change -- and posing a threat to inhabited areas.

- * I have seen science on this subject that indicates that areas least treated by the USFS have had the best response and recovery from fire. Has the USFS seen those studies and what is its response to them? Are those studies being taken into account in the USFS' planning?

- * Impacts from any chemicals or treatments used, including herbicides and/or especially the potassium permanganate/antifreeze combination used for aerial ignition. What studies document their safety? Are there studies that show them to be toxic? Again given proximity to population this must be considered.

- * Given the proximity of the treatment areas to populated ones, what assurance can be given that the intended aerial ignition will be safely contained to the project area? My WW2 vet grandfather would have told you that bombing from the air is something at which it is very difficult to be accurate. It seems that firebombing would have numerous possible scenarios under which it could go very, very wrong. Has the USFS calculated these risks and included them in the justifications for using aerial ignition?

* Impacts on soil. Large lumber masticators and other machinery used by the USFS in any of its treatments can cause soil compaction, hydrological runoff issues and induce sedimentation in our surface water flows.

* 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? How will the thinning of up to 95% of trees in some areas affect habitat and biodiversity?

* Impacts on the integrity of the ecological network of these forests. What reduction in ecosystem services currently provided to the city of Santa Fe by the forest, do you expect? These are not idle questions, though we have in our historical obliviousness so far ignored them. Climate Change is proof that doing so is foolish, ergo here we should be very careful not to repeat that mistake.

* Forest have direct impact on weather patterns and especially moist weather, effectively acting as water generators. Has Santa Fe County or City been made aware that the proposed project actions may have effects that directly result in decreasing water availability for its citizens?

* Has the amount of Carbon Dioxide that will be released by the proposed project been calculated? How is the USFS planning to offset the release of this CO₂, again given the aforementioned issues around Climate Change itself vis-à-vis the Administration?

The details provided so far for the project are insufficient for even a well-informed person to assess the potential local impacts of this project as proposed. Only vague hand-waving was given at the public meeting, when -- for a project occurring so close to so many people -- it seems obvious that a clearer picture of acreages, treatment types, and specific locations is necessary. I also ask for some sort of timeframe around which people could expect and plan for; a window of a few weeks at the least, with several weeks or even months of advance notice for those potentially affected.

Sadly and as much as it pains me as an American to say, it must also be mentioned that the current Federal Administration is defensibly notorious for its willingness to attempt to exploit the authority of its agencies in order to punish those it perceives as political enemies. Given the fact that the Santa Fe area has a reputation for being a so-called "Liberal Stronghold", the sudden urgency that the USFS seems to feel for this project is unfortunately suspect. This is even more reason to make sure that the proposed project is based on certain, current and sound science and not be rushed or begun lightly.

Sincerely,

Eric Hochman