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Organization:

Title:

Comments:

As a resident of Santa Fe who lives in a wooded area on the east side of the city, .79 miles from the SFNF boundary, I write in support of the Santa Fe Conservation Alternative to the Santa Fe Mountains Landscape Resiliency Project, as put forth jointly by the Sierra Club, Defenders of Wildlife, and WildEarth Guardians.

During my many years of residence and homeownership within this state, over a period of three decades and always within a mile or less of this Forest (Los Alamos, Ilfeld, and Santa Fe), I have been witness to more than a dozen significant wildfires within sight of my residences and workplaces. Among these, I have witnessed the Dome Fire, caused by an abandoned campfire on Forest land; I have witnessed the Cerro Grande Fire, caused by a so-called "controlled burn" on Park Service land that quickly spread to Forest land; and I have witnessed the Las Conchas Fire, caused by a downed electrical line. All three of these, which both individually and cumulatively have had a profound effect on the Jemez mountains I have at times lived in, done research in, and recreated in for thirty years, were human caused. Two of these, the Cerro Grande and the Las Conchas Fires, destroyed the homes of people I knew. I would also add that we in Santa Fe are all too aware of the fact that the recent Doghead Fire in the Manzanos, which burned 17,000 acres and destroying 12 homes, actually began during a thinning operation on National Forest land. All of us who live in Santa Fe have a direct interest in preventing what has happened multiple times in the Jemez and just two years ago on the Cibola—namely, the ignition of large human-caused fires during the windy pre-monsoon dry months, ultimately leading to loss of homes, which all of these were. But it bears emphasizing that too many of the largest and most "catastrophic" fires that have occurred in the last twenty years have been the result, not of natural causes and Park Service and Forest Service inactions, but of human and agency "management" actions, including a century of Forest Service fire suppression in blatant ignorance of and disregard for the role of fire in our forest ecology. Furthermore, too many of those who did lose homes did so because they failed to make their homes and communities defensible against the fires that will inevitably occur in these forests.

As a resident of Santa Fe who lives within a WUI area, I support the Santa Fe Conservation Alternative for the following reasons:

1. When not caused by human intention or carelessness, fire is by definition a naturally occurring phenomenon in our lightning prone southwestern forests. As such, the ultimate responsibility for the safety of homes and structures within a fire prone ecosystem rests with those who build and live in those structures, which means ensuring fire resistant building materials and the creation and maintenance by landowners of defensible areas around their own homes. These forests require the hands-off return of the intermittent naturally occurring lightning-caused monsoon season fires that have been suppressed for too long, and not large scale "thinning", to return to actual health, which is marked by ongoing natural processes and not continuous human interventions and counters-interventions in an attempt to achieve some arbitrarily determined ideal state. And that means they need to be allowed to burn when ignited by lightning. The ultimate onus for community and residential safety on private land thus lies with those communities, landowners, and homeowners, and not the Forest. If this is a responsibility adjoining landowners and homeowners are unwilling to accept, they should choose to live elsewhere. The Santa Fe Conservation Alternative places clear responsibility upon adjoining landowners and communities, rather than on an underfunded and overworked Forest, to address the defensibility of neighboring private land and structures against wildfire.

2. This Forest, last I knew, has one Law Enforcement officer. With 1.6 million acres to oversee, this is absolutely insufficient to the mandate of this Forest to protect the land and natural resources under its oversight. The Santa Fe Conservation Alternative specifically endorses increased education and enforcement as essential to prevention of so-called "catastrophic" wildfire, which, again, have more often than been caused by human ignition during the windy pre-monsoon months. Prevention and education through a significantly increased field presence by additional Forest law enforcement must be an explicit component of this plan, and it bears pointing out that such an increased enforcement presence will also have the effect of helping this Forest address many of its other rampant violation issues (illegal dumping, trespass cattle, illegal ORV use, illegal road construction, etc.) in the process. Education and enforcement in wildfire related issues does not and cannot occur solely through a web site and signage. It requires Forest Service boots on the ground and in the field, monitoring for and addressing human ignorance and carelessness. The funding of forest "thinning", which

is not a natural process and has entirely different ecological effects than fire, comes at the expense of the additional law enforcement this singular Forest deserves and absolutely must have.

3. Given what is at stake for all of us who live here, in terms of our economy, our scenic values, our principal water source in the Forest's watershed reservoirs, and the ecology of a Forest land area that includes Inventoried Roadless Areas and old growth forest with Federally listed Mexican Spotted Owl habitat and Forest Sensitive Species Goshawk habitat, as well as habitat for a number of other of the 32 species on the Forest's own Species of Conservation Concern list, the SFMLRP proposal must include an EIS. Given the exceedingly high stakes-not simply our homes but also the health and very existence of bird, mammal, plant, amphibian, fish, and invertebrate species within this proposed project area-the Forest and the public need to know and understand the full implications of all of the various actions this Forest proposes to undertake as part of this plan. This is especially important since the SFNF is still in the midst of its long overdue Forest Plan Revision Process and is currently operating under a Plan it has itself acknowledged is outdated, which it nonetheless cites in the SFMLRP proposal. The new Forest Plan draft, which has just been released, has yet to receive public comment, has yet to be revised again following public comment, and has yet to be enacted. Additionally, this Draft Forest Plan revision includes a proposed (and very welcome) Wilderness Management Area designation within and adjacent to this proposed project area (Thompson Peak). It is thus imperative that this Forest complete an EIS that fully evaluates the effects and risks this project entails for all of the above. This is all the more vital given the escalating pressures and changes these forests (which are complex living ecosystems and not simply "scenery" and "fuel loads") face as a result of current and projected climate change stressors, which necessitates for a project of this scale and type the granularity an EIS and not an EA provides.

4. Finally, I request that the public comment period for this proposal be extended to 90 days, 30 days being grossly insufficient for full and detailed public participation on a project of this scale. I should mention that I am still waiting for fulfillment of a FOIA request I submitted to the Santa Fe National Forest four and a half months ago, a fulfillment delay that is considerably over the twenty working days mandated by Federal law. Conscious of the effects of the Federal shutdown this last winter, along with what I know are other budget and personnel constraints beyond the control of this Forest, I have myself been exceedingly patient with the Santa Fe National Forest's excuses and pleas for more time on my own FOIA request, and I think the very least this Forest can do is extend that same courtesy to the public and the citizens of this city, county, state, and nation, all of whom have either a personal or legal interest in these public lands, by extending the comment period to a length commensurate with the complexity of this proposal.

Thank you for all of your hard work and for your attention to these concerns. Also, I request an email acknowledgment that these comments have been received.