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July 10, 2019

Santa Fe National Forest
11 Forest Lane
Santa Fe, NM 87508

Submitted via email to: comments-southwestern-santafe@fs.fed.us

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

Dear Santa Fe National Forest,

I do not believe it is in our best interests for the Santa Fe Mountains Landscape Resiliency Project to proceed. In my estimation, the Project will be unable to attain its stated goals of reducing the risk of catastrophic wildfire and improving our forest's resistance to climate change and insect outbreaks. Instead, I believe the Project will be ecologically destructive, will contribute to climate change, will substantially uglify our natural surroundings, and will overall be a highly unwelcome setback for our forest and our community.

If you do not cancel the Project:

1) I request that you prepare an Environmental Impact Statement required under the National Environmental Policy Act for major federal actions which “significantly affect the quality of the human environment.” Examples of how the Project would significantly affect the quality of the human environment include:

- a)** Decreasing the appeal of Santa Fe as an outdoor, nature-oriented destination by removing the majority of trees and vegetation from Santa Fe's most proximate and most-used recreational forest area.
- b)** Contributing to global warming by burning carbon sequestering trees and vegetation.
- c)** Exposing our community to the health hazard of high-particulate smoke from low-intensity prescribed burning.

2) I request that you make the following maps readily available to the public as soon as possible, preferably in layers easily viewable online:

- a)** A map of the treatment units in the Project Area, accompanied by unit sizes and the parameters of the fuels treatment prescription(s) to be issued for each unit.

- b)** A map of all existing roads, tracks, and trails in the Project Area, specifying for each different segment its type of road, track, or trail along with its width and condition.
- c)** A map showing all existing roads in the Project Area which are slated for improvement, specifying for each different segment the desired type of road and its desired width. Please also display on this map roads slated to be decommissioned.
- d)** A map of Inventoried Roadless Areas in and around the Project Area.
- e)** A map of proposed wilderness in and around the Project Area.
- f)** A map of former logging operations in the Project Area, with accompanying dates, and targeted tree species.
- g)** A high-resolution contour map of the Project Area and its surroundings.

3) I request that you please:

- a)** Analyze the extent to which the Proposed Action will protect the Project Area from wildfire. Please include what weight you assign to the forest drying out as a result of:
 - i)** removal of live trees and vegetation which contain significant amounts of water including in their roots
 - ii)** greater exposure of soil and remaining trees to heat and sunlight via removal of much of the forest canopy
 - iii)** increased wind speeds through the forest as a result of extensive tree removal
- b)** Specify both the pre-treatment and post-treatment probability per year of the Project Area's experiencing **i)** low-medium-severity wildfire, and **ii)** high-severity wildfire. Please document the sources and calculation methods of these stated probabilities, and discuss areas of uncertainty contained in such probabilities from both an ecological and mathematical perspective.
- c)** Perform a cost/benefit analysis of the risks of thinning and prescribed burning operations leading to high-intensity wildfire compared with the probability of such treatments both encountering and substantially moderating high-intensity wildfire.
- d)** Explain why you believe the Proposed Action will help protect the forest from climate change, taking into account the effect on global warming from the removal of carbon sequestering trees and other vegetation.
- e)** Analyze how the Proposed Action will on balance serve to protect the forest from insect outbreaks.

- f)** Analyze **i)** how removing the majority of trees and vegetation from treatment areas on balance improves wildlife habitat there, and **ii)** how you weigh the lives and habitat of animals *currently* residing in the Project Area compared to the lives and habitat of *future* animals residing in the Project Area.
- g)** Compare and contrast road improvement in Inventoried Roadless Areas with road reconstruction in such areas, meaning *reconstruction* as referred to by the Roadless Rule.
- h)** Evaluate the benefits of conducting fuels treatments in Inventoried Roadless Areas relative to the intention that Inventoried Roadless Areas be left intact and undisturbed.
- i)** Analyze the extent to which fuels treatments more than 200 feet from homes and other infrastructure are protective of such homes and infrastructure.
- j)** Specify the estimated cost of the Project, broken down by location and category of expense, including future maintenance and monitoring costs.
- k)** Discuss peer-reviewed scientific studies which implicitly counter the suggestion that the Proposed Action will achieve the Project's stated purposes of improving the forest's resilience to wildfire, climate change, and insect outbreaks.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jon Glass', with a stylized flourish at the end.

Jonathan Glass