

Mr. James Melonas Forest Supervisor Santa Fe National Forest
11 Forest Drive
Santa Fe, NM 87508

RE: Scoping comments for the Santa Fe Mountains Landscape Resiliency Project

Submitted by email to comments-southwestern-santafe@fs.fed.us and to
Hannah.Bergemann@usda.gov

Wednesday 10 July 19

Mr. Melonas,

As a resident of Santa Fe's Wildland Urban Interface, I am deeply concerned about the enormous size of this proposed project, the short comment period allowed to the public. Unfortunately the repeated response by the Santa Fe National Forest Service employees is that there will be no Environmental Impact Statement regarding its effects on our beloved forest.

The SFMLRP is also of unprecedented size. At 50,000 acres it is one of the largest single vegetation clearing and burning project ever proposed on SFNF's eastside. It took longer, with more public input, to approve the small Railyard Project, in comparison to the 50,000 acres in this project. As evidenced by the two public meetings already held, this project is highly controversial. The lack of details in the scoping documents, and lack of clarity in answers provided during the public meetings have left the public with insufficient information to submit thoughtful comments at this time.

As currently written, the scoping document does not delineate the potential for environmental harm to a host of critical resources, including: (1) inventoried roadless areas (IRAs); (2) high and moderate value wilderness characteristic areas; and (3) endangered species, forest service sensitive species, and critical habitat, leaving the "potential for environmental harm" largely unknown.

I would like to know why there is such a rush to push this permanent cutting and burning of our forests? Please extend the comment period to 90 days for a more democratic process.

The Santa Fe National Forest employees are arguing that the entire proposed project area needs to be thinned and burned. But, the research of [Dr. Chad Hansen](#) and [Dr. Jack Cohen](#) shows that the most effective mitigation of damaged property in the event of wildfire is to **directly treat around homes and structures**. This current science must be considered carefully.

I would like for you to allow the **climate scientists** with experience in forestry, such as [Dr. Dominick Della Salla, PhD](#), to weigh in during this critical time of massive loss of species, habitat, and plants in the proposed project area. The last thing we need is to cut our carbon sequestering plants. They provide Santa Fe our only buffer against the climate crisis. We truly need every tree we have and every other plant in Santa Fe to help us bring moisture and rain, keep the ground cool as the temperatures rise, and decrease winds and the spread of pests and other parasites on trees that occur with thinning.

I would also like you to consider the health of the wildlife and the public when using aerial ignitions containing **potassium permanganate, ethylene glycol and diesel fuel** and how these are currently affecting our health and well-being. These harmful chemicals also impact the economy, tourism and reputation of [Santa Fe as one of the cleanest cities in the country](#). Many citizens of Santa Fe are complaining about current fires and the health affects (whereas the equally impacted wildlife cannot).

I am also concerned about **opening roads** (either lightly loaded or inventoried roadless areas) and increasing the exposure of our wilderness to further exploitation by industry which can degrade wildlife habitat, spread invasive species, and allow arsonist and wildlife poachers free access. Many roads in the forest should be completely obliterated, not improved for access.

Please review the following **areas of concern** as well in your Environmental Assessment.

CLIMATE DISRUPTION From the United Nations website regarding climate change.

"Climate change is the defining issue of our time and we are at a defining moment. From shifting weather patterns that threaten food production, to rising sea levels that increase the risk of catastrophic flooding, the impacts of climate change are global in scope and unprecedented in scale. Without drastic action today, adapting to these impacts in the future will be more difficult and costly."

(<https://www.un.org/en/sections/issues-depth/climate-change/>)

HABITAT - AREAS FOR HABITAT IMPROVEMENT What are some of the pressing issues for habitat improvement that need to be addressed? Please be specific – beavers? Bobcats? Bears?

ESA - MOST PRESSING ENDANGERED SPECIES (ESA) ISSUE(S) What are the most pressing ESA issues that need to be addressed? Mexican spotted Owl? Other threatened species?

MANAGEMENT TECHNIQUES Thinning and prescribed fires? How likely are they to bring about the major changes you seek over time? Do they make sense in light of the realities of climate disruption?

EFFECTIVENESS OF MANAGEMENT TECHNIQUES How effective do you think the management techniques will be? How often do you see needing to repeat them?

WATERSHED Will you increase your focus on areas near the watershed? If so, in what way or how? How will you go about balancing your long-term, multi year-projects with new issues that arise?

TOP PRIORITIES Please identify top priorities for treatment in the next three years, what would they be? What factors would you consider when deciding what projects to take on first?

WUI – WILDLANDS URBAN INTERFACE What is your plan for management/treatment around the WUIs?

INVENTORIED ROADLESS AREAS (IRA) What is your plan for management/treatment in IRAs?

INFESTATIONS – MOTHS AND BEETLES What is your plan for management/treatment of pests? Tussocks moths? Bark beetles?

VISUAL BARRIERS AND BUFFERS What are your plans visual barriers and other visual buffers?

ROAD IMPROVEMENTS What are your plans road improvements? Forest Road 79? Forest Road 79W? Ancillary roads? Grading? Widening? How do you plan on getting masticators in the treatment areas?

BUDGET What are your projected budget? What funding sources will you be looking for?

CONTRACTOR AVAILABILITY How available do you think contractors will be? How will you assure that the contractors are indeed documented workers that are fairly treated and adequately paid? Where will the contractors come from? In state? Out of state?

CONTRACTOR OVERSIGHT How do you plan on addressing quality assurance and contractor oversight? How will you oversee the contracts to assure compliance?

Thank you for your consideration of this matter. Please include this letter as part of the project record. Let me know if you have any questions. Please include me on the list of interested parties.

Thanks for taking the time to review my comments. I look forward to hearing from you in confirmation.

Sincerely,

Dyan Oldenburg

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