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First name: Bob

Last name: Funkhouser

Organization:

Title:

Comments:

July 10, 2019

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

Dear Mr. Melonas,

I live in piñon-juniper woodlands off of County Road 51, near the 51C branch to the Santa Fe National Forest. I am a retired engineer, systems analyst, and IT professional. In New Mexico I worked five years at the Santa Fe Institute followed by thirteen years at the Los Alamos National Laboratory. In 2008 I was hired by the State of New Mexico EMNRD department to produce a report on Off-Road Vehicle Recreation in New Mexico. I currently am associated with the Santa Fe Forest Coalition. However, these comments are my personal comments as a landowner living near a National Forest and as a citizen concerned about the health of the forest ecosystem and the Web of Life within it.

I appreciate the goals of the SFMLRP and agree with them in principle. However, without a comprehensive EIS using all of the latest research (not just GTR-310 or cherry-picked studies) and evaluating alternative actions, including no action, it is my view that the severe thinning and prescribed fire planned for over 50,000 acres will do serious and lasting damage to the Santa Fe National Forest and result in serious negative effects on recreation, tourism, wildlife habitat, air quality, and overall desirability of living in and visiting Santa Fe and the Santa Fe National Forest.

I do support actions to decommission and close roads but please be careful with improvements lest it invite additional traffic or off-roading in the area. And I support restoration of riparian areas as long as it does not involve severe thinning and prescribed fire. I would also support and recommend pro-active measures to prevent flooding and debris flows in the event of a large fire, and to prevent damaging flooding and debris flows which can occur under the right conditions in the absence of a large fire. We know that storms are increasing in intensity. It is quite reasonable to expect a 1,000 year storm within the next 50 years. If this should occur and perhaps coincide with a heavy snowmelt then massive flooding and damaging debris flows could result even without a recent major fire. It makes sense as a preventive measure to prepare for such an event with (some, but minimal) contour felling, moving earth, creating check dams, holding ponds, drainage ditches, berms and swales, and whatever else can

be done to pro-actively mitigate flash floods and debris flows. Such work should also have positive effects on the forest and wildlife by increasing water retention.

I would also support minor thinning around WUIs to help protect those areas from wildfire but in addition, homeowners need to take action to reduce the ignitability of their properties using proven Firewise practices. This is even more important and urgent for homeowners living in "Intermix areas", where natural vegetation is dominant. It makes no sense, and is a waste of resources, to perform drastic fuel reduction in the wildlands if homeowners in Intermix and WUI areas do nothing to protect their homes.

Regarding fuel treatments to reduce fire in wildlands, Professor William Baker, in his fine and

very detailed 2009 book "Fire Ecology in Rocky Mountain Landscapes", says:

"Fuel reduction and fuel breaks are shown to have limited effectiveness and deleterious impacts on nature and are best used only in defensive positions adjacent to housing and infrastructure." (p. 452)

and:

"Fuel reduction outside of community fire-planning zones is a waste of funding that would be better directed at interfaces." (p. 459)

and further:

"Since fire may not have declined relative to the HRV and may increase several times in coming decades, there is no need to conduct prescribed burns to offset a perceived fire deficit or to regenerate shrubs or trees." (p. 459)

And finally:

"Fuel reduction outside the community fire-planning zones is not needed." (p. 460)

Professor Baker does support the judicious use of "managed fire" (allowing naturally occurring fire to burn, with limits), as do I. And it makes sense to create a few safe zones for firefighters, though I think these should be small, strategic, and done so as to double as meadow for Nature.

I have visited the Santa Fe Watershed area above Black Canyon Campground which has been thinned and burned. And I have visited treated areas in La Cueva. I find the results appalling and the antithesis of thriving, compelling, inviting Nature. The reality I have seen is not anything like the beautiful, inviting, park-like pictures the Forest Service shows on its website or uses in GTR-310.

When you walk from the old growth area above the Black Canyon campground to the border of the watershed with the "no entrance" sign, it is clear that the majority of wildlife would avoid the treated area. In essence it is habitat destruction on a large scale. I understand and appreciate, and support, the need to protect special assets such as water supplies and so in those cases, thinning and prescribed burning makes sense. But I am very concerned that widespread severe thinning and prescribed burning

in 50,000+ acres will not only seriously compromise the area for wildlife and recreationists, but in this

era of rapid climate change (unprecedented in history) will result in major ecosystem destruction.

Let me repeat that reality -- we are living in an era of UNPRECEDENTED CLIMATE CHANGE. Here is the leading paragraph from the United Nations website on the issue:

"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/>)

I don't recall GTR-310 incorporating UNPRECEDENTED CLIMATE CHANGE into the assumptions. GTR-310 does say this in the Executive Summary (underline added for emphasis):

"We recognize that reference conditions in frequent-fire forest may become less relevant in

changing climates, but believe that restoring their composition, structure, and characteristic processes today should aid the retention of ecosystem components while research and management develop options for whatever the future might bring."

The above is from 2013 which was based upon data and studies done before 2013, and before science recognized the urgency of climate change that has since been recognized. A lot has happened in ten-plus years, and so I submit to you that the assumption (and it is an assumption) that you can restore the forest to a long-ago reference condition using the guidelines of GTR-310 is foolish, risky and ill-advised. And not only are the guidelines of GTR-310 of questionable applicability because of climate change,

GTR-310 is based on research data from other forests, other ecosystems (all things considered) and other historical periods. A thorough Environmental Impact Statement must be prepared which takes the actual composition of the forest, the soil, the plant life, the wildlife, and the climate of the Sangre de Cristos into account, and it must include rapid and unprecedented climate change to have any credibility.

Thank you for considering my comments.

Sincerely,

Bob Funkhouser