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Subject: [External Email]Objection to the Santa Fe Mountains Landscape Resiliency Project decision
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Regional Forester
USDA Forest Service, Southwest Region
333 Broadway SE
Albuquerque, NM 87102
Submitted via email to: objections-southwestern-regional-office@usda.gov

To the objection reviewing officer:

The Forest Advocate is submitting this objection to the U.S. Forest Service's March, 2022 draft decision notice, finding of no significant impact, and the April 2022 Final Environmental Assessment for the Santa Fe Mountains Landscape Resiliency Project (SFMLRP), on the Espanola and the Pecos-Las Vegas Ranger Districts of the Santa Fe National Forest.

The Forest Advocate is a small organization based in Santa Fe, dedicated to publishing news and resources on forest protection, with a focus on the Santa Fe National Forest. We also advocate for the protection and conservation of the Santa Fe National Forest.

The objector is:
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The project area covers 50,566 acres, with 38,680 acres designated for vegetation treatment over the next 10 years, including 18,000 acres of vegetation thinning, 38,000 acres of prescribed burning and 680 acres of riparian restoration. The project also includes maintenance burning, to occur every 5 to 10 years. The responsible official is Santa Fe National Forest Supervisor, Debbie Cress.

The Forest Advocate's draft environmental assessment comments were about prescribed burn smoke, focused primarily on the public health impacts of prescribed burn smoke, and what measures the Forest Service should take to evaluate and mitigate the impacts of the prescribed burning proposed.

We stated in our draft EA comments:

"The Santa Fe Mountains Landscape Resiliency Project EA contains a proposal to apply prescribed fire to 38,000 acres of forest nearby Santa Fe, and then to periodically repeat the burns. This would greatly increase smoke pollution from prescribed burns in the Santa Fe area. Although we understand there may be some justification for very limited and occasional burning in targeted areas, the amount of burning proposed is many times too much given the severe health impacts current smoke levels are already having on many local area residents.. People are truly suffering, and the Forest Service has so far not seemed willing to even acknowledge it.

Dr. Erica Elliot sent you a letter dated February 21, 2021, describing the severe effects of prescribed burns on her patients. It is attached below. There are many people who are not patients of Dr. Elliot that have equally severe effects from prescribed burns smoke. There are also many others who are not suffering quite as intense effects from the smoke, but for whom the smoke still has a substantial negative impact on their lives."

The Forest Service did not respond to these concerns either in the Final EA, nor in the "SFMLRP Draft EA Public Comment Period Content Analysis and Response," even though they included a passage from our comments in the "representative comments."

"Ten years ago, the Santa Fe region had exceptionally clean air. Today, with the amount of prescribed burn smoke in the air, which has increased yearly, the public health is being substantially impacted according to local physicians. The most damaging aspects of breathing smoke is inhaling the tiny particulates known as "PM 2.5". These fine particulates affect lung function and can cause eye and nasal symptoms, adversely affecting our immune systems and increasing the risk of heart attack and cancer. (Doctors and Scientists Against Wood Smoke Pollution)." Appendix G at 5.

We stated in our draft EA comments, "It is not true that prescribed burns largely replace wildfires, or that if there are prescribed burns, the amount and intensity of wildfire will decrease proportionately. Only about 1% of fuel treatments per year are encountered by wildfire, and fuel treatments are only effective for a window of about 10 years, so most prescribed burns are not preventing wildfire. The truth is that prescribed burns emit amounts of smoke that are largely in addition to the amounts of smoke emitted by wildfire."

The Forest Service states in the Final EA "Prescribed burning associated with the Proposed Action would produce less smoke emissions than wildfire emissions associated with the No Action Alternative."

However, this is based on the unproven and exceedingly unlikely assumptions that the Forest Service utilized in comparing the emissions from prescribed burns versus wildfire.

As we described the assumptions in our draft EA comments:

"The Forest Service unrealistically assumes that over the next 10-15 years:

a) The chances of the entire Project Area succumbing to wildfire is 100% if the proposed fuels treatments are not undertaken, and

b) The chances of there being a wildfire anywhere in the Project Area if the proposed fuels treatments are undertaken is 0%."

With such unrealistic and non-real-world assumptions, all analysis utilizing such assumptions is invalid.

The Forest Service did not address these highly flawed assumptions in the SFMLRP draft EA. Valid analysis should be done, with realistic assumptions that pertain to conditions in the Santa Fe National Forest.

We stated in our comments that "The agency owes the public a scientifically reasoned, credible analysis of a) the probabilities of wildfire in the Project Area, and b) the expected efficacy of its fuels treatments in preventing wildfire. Without such an analysis, there is no reasonable basis for the Forest Service's Proposed Action. The Forest Service must do the analysis and include it in an EIS."

The agency has not done any of the above, and the project decision was a Finding of No Significant Impact. That so many people are made ill by the known toxicity of large amounts of prescribed burn smoke, especially PM 2.5, is a significant impact.

Due to the known extent of the health impacts of smoke on public health, and that many Santa Fe area residents have made the severe impacts to their health from prescribed burn smoke known through both SFMLRP scoping and draft EA comments, through emails to the Forest Service, by editorials and letters written to newspapers, and by testifying to both the Santa Fe Board of County Commissioners and the Santa Fe City Council, the Forest Service is required to complete an Environmental Impact Statement for the SFMLR project.

We also ask that the Forest Service simply have some compassion for the extent that Santa Fe area residents are suffering from the health impacts of smoke due to the large amounts of prescribed burns already occurring, and choose to largely decrease the scope of the project in order that much less smoke will be emitted from prescribed burns.

Thank you for taking The Forest Advocate's objection to the draft project decision for the Santa Fe Mountains Landscape Resiliency Project into consideration.

Sarah Hyden
The Forest Advocate