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Organization:

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Mr. Sandos

There are a lot of red flags in the proposal for the Encino Project, below are some thoughts highlighting them.

The community has great concern for the proposal, first of all, because of the devastating effects of the Calf Canyon fire in our culturally significant neighboring villages and forests of Mora and Taos area. Our Cañones community and sister town of Abqiuú (Phé shúu ú) would be greatly affected if this goes wrong, and the watershed of Cañones would be as well.

A few initial questions: Has there been a drought assessment for the project? Has the media been contacted by the Forest service about the project? How many decision makers will there be for the proposal, will it be done by one person or a committee? Are there locals involved in the decision making?

It is my understanding that you are retiring soon, Mr. Sandos, are there others who can take the lead once you move on and pass the torch to them? What kinds of measures are in place for that succession?

Here are a few concerns I want to put forward:

Community:

- The USFS needs to hold a listening meeting where it listens to communities like Cañones to gain and build further trust especially after the USDA forest service burned the historic village of Mora with their "control burn" operation.
- There needs to be one in Cañones, and members of the teams should get a sense of acequia and land grant knowledge.

Watershed:

- There is more thought and attention is given to mitigating trail user impact along the Continental Divide Trail (CDT) than the entirety of the Cañones Creek watershed that will impact an entire traditional community. Considerations such as notification timelines, point of contact, provision of alternate route, etc are included for the CDT in this EA. Meanwhile, the Cañones Creek watershed analysis is not done, and no intention of community notice, engagement or provision of alternatives is considered.
- There should be protections in place for cultural and historic villages and people near the project.
- There should be improvements with relationship between local people in place between Forest Service and historic villages.

* Cañones Creek impact:

- Many agricultural families and communities might be affected by watershed issues for potentially years and this is UNJUST for impoverished or low income minority families and Genízaro/Chicano/Mestizo communities such as ours.

Tree harvesting:

- If there are concerns for budget and staffing, why not create trainings for community members to clear out

forests as an incentive to logging proper trees. There are ways to work with locals that don't keep them out, rather help them improve their own incomes and small logging sales.

-Vigas and latillas as, trees with small diameters are a viable tree-harvesting options for locals.

-There needs to be more incentives and area for smaller companies and contractors who can cause less damage with smaller equipment.

-We want codified policies to ensure smaller tree harvesting and fire wood extraction by locals can be done by locals.

* Over again, SFNF plans and this draft EA claim an intent to provide access to culturally important resources to traditional communities. However, SFNF has no policies or procedures in place for ensuring or providing this access.

-Local understanding

* There is at least 1 known historic structure in existence near the Cañones Creek near the Mogote. Is this historic structure known to SFNF?

* The analysis in this draft EA relies heavily on modeling, this is lacking data. Very few of the subject matter experts offered for public interaction have visited the project area. Local communities have not been consulted to be on committees or on the project.

* The analysis indicates acceptable impacts to local watersheds that are in fact absolutely unacceptable to local community and traditional ways survival.

* Is this project modeled after places like Oregon, where many people involved in this project are from? Do they know it's a much different climate and environment here?

* Local observations indicate more frequent and more intense wind events over the past 2 years, relative to the past 40-50 years. Do the models being relied upon for decision making accurately reflect this?

* The relationship between the community of Cañones and the SFNF has been challenged for a long time.

* The SFNF needs to hold not just a community meeting, but a listening session with the community, allowing project staff to hear about local history and learn from relevant traditional knowledge. The subject matter experts made available to the public at a project public meeting had never heard of a land grant or an acequia. This information is in the SFNF Land Management Plan, which should be required reading for staff. How can people from out of state work on this project without consulting or getting to know local knowledge and input? How can this project move forward without local knowledge and input? How can it move forward without the opportunity to learn the fundamental elements of our community?

* SFNF was told in public comment that many Cañones community members primarily speak Spanish. However, project materials have not been readily provided in Spanish, and the notification they are available by request is only embedded within the English language document. This erodes the relationship with traditional communities as Cañones is a Spanish land grant, carrying our language forward as a primary feature of our culture and heritage. No community meetings have been offered in Spanish.

* The EA acknowledges socioeconomic challenges of our community includes lower access to vehicle transportation and lower income. Yet, the few community meetings offered were in Gallina and Abiquiu, with no virtual option.

-No meeting was offered in Cañones, home of renown poet Jimmy Santiago Baca, acclaimed photographer/filmmakers, Doctors, Engineers, Genizaros, Chicanos, Mestizo people, teachers, LANL workers, government employees, military people, voters, and culturally significant structures and ranches.

-Also, the draft EA presumes that short-term disruptions to forest resource access will be mitigated by users going to nearby alternatives. Nothing is readily accessible nearby as this

project area is huge and resources in the southern Jemez are already more saturated. Not to mention the smoke

that the fires would create that would negatively impact workers/contractors in nearby forests.

* Local residents, especially traditional community members who carry generational knowledge about the area should be included in decision making, planning and data input collection. Current USFS and SFNF plans, reviews and policies state that incorporating the experience and knowledge of historic communities and building relationships with them is to the benefit of programs, outcomes and the Agency.

* A local traditional community member or members should be part of the team for all burn plans, specifically the Appendix C - Prescribed Fire Plan Template, Element 2A, including drought awareness and variations from expected conditions, and Element 2B Go-No Go, Item A.

* How can local communities contribute to building reliable data sets to improve modeling output?

* Many local residents had small timber operations in the past, and still hold local area and practice knowledge. Some of these people could be good resources to augment the small and overstretched SFNF timber products staff. I encourage you to go through your records of loggers who have obtained licenses in the area. Creating incentive for them and proper trainings could help aid the staff.

* Reference comment above regarding local marketability of timber products <12" diameter - This draft EA analysis assumes only sawlogs are valuable and that there are primarily local operators who will benefit from them. Again, this is not Oregon. Here, we commonly use the small timber products to build our homes, outbuildings, fences and other structures. This is part of our cultural heritage. In fact, an entire home building and landscaping industry in Santa Fe and Albuquerque relies on this seller timber and locals could benefit from this market!

* The staff should experience road 100, and get to know locals in more community forums and events and listen to our input.

I hope that you will address some of these concerns and questions that I've brought to your attention.

Thank you,

Andres Salazar