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First name: Eliud

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Organization:

Title:

Comments: Dear Mr. Sando,

My name is Eliud Salazar and I am a community member residing in Cañones New Mexico where my family has lived for centuries and generations. I am an heir of the Juan Bautista Valdez, San Joaquin, And Piedra Lumbre Land Grants, and parciante of the Upper Canones Community Acequia and the Polvadera #1 Acequia Associations. I am writing to provide comments on the Draft Environmental Assessment (EA) for the Encino Vista Landscape Restoration Project.

I appreciate the project goals of reducing the risk of uncharacteristic and devastating wildfire in the project area. As I am sure that you are aware, our national forests in general have been mismanaged allowing for dangerous over growth. Which, correcting this, I am sure, is the main reason for this project. Even with acres and acres of useful standing and deadfall timber procedurally inaccessible to those of us who could make use of it. However, I have serious concerns with this project planning, the information being relied upon for decision making, and the lack of meaningful involvement of traditional communities, Acquia organizations, land grant Organizations, minorities and low-income residents beyond Tribes and Pueblos.

As I understand it, the management and protection of the watersheds is a main priority of the NF. To not engage in direct communication with the acequia organizations and communities that will be affected by this project is a major failure of this initial planning process of this project.

Much of this project relies upon burning for treatments. The project draft EA states it will follow the recommendations of the September 2022 USFS National Prescribed Fire Program Review, a result of the devastation of the Calf Canyon Hermit Peak fire and aftermath. However, that Review calls for NEPA plans to include drought and climate assessment, and yet this draft EA does not include a drought assessment.

Although I would agree that it is impossible to treat the forest as it is now without some of this planned project using burning methods. I strongly recommend avoiding this method as much as possible and use this opportunity to use mastication and product removal by local community people and competent forestry industry companies. The burning methods that have historically been used continue to contribute to the current global warming issue.

I think that by using mastication and product removal as much as possible more carbon sequestration can be achieved while minimizing carbon release as well as reducing the danger of a wildfire from intentional burns. It is also very concerning to see smoke filling our beautiful skies frequently during the prescribed burning and the wildfire season. Frankly I am also concerned about my health from all the smoke in this area also. My most urgent concern is for a fire to occur in the watersheds of the communities. Steep canyons have a lot of fuel buildup with very difficult or no access. Crown fire potential is very concerning. Also, beetle kill has reduced canopy cover and increased rate of snowmelt.

I would like to see a stewardship program implemented that prioritizes local people, offering education on best thinning practices and pays them to do work. A program for the youth of our local communities to learn about healthy forest practices. I do not support any return to past selective high-grade logging like what damaged forest generations ago.

The sale of timber products should allow prioritization for local and traditional community members. We are invested in the health of our forests and tend to work with greater care, knowing that solely commercial motivation is not good practice or sustainable for us into the future.

As a person that has worked in the forest for 4 decades it troubles me to see marketable timber products being burned or masticated when it could support a small timber operator with the same product. One of the main reasons that I went to private land logging and eventually changed my business to other aspects away from my earlier success in timber and small forest product removal was because these products were not being offered anymore. Rather these products were either given mastication and burn priority. Rather than my company paying to thin and remove small diameter products or remove timber products that are much more valuable than most commercial timber.

Why are timber sale units limited to those that are commercially viable for large operators only when there are, or were due to changes in policies, smaller commercial operators that can work with more precision in the forest?

Why are roads always an excuse for accessing dead stands of good timber products that left in place is a big fire hazard, and could support small timber operators?

Is there opportunity for contracted staff support for the timber sale folks, particularly geared toward smaller operators? Some small local operators who are nearing retirement or shifted more to other industries are well qualified in identifying marketable and commercially viable areas and assessing access potential. They may not be working with contracts directly but can provide the overworked staff with valuable information to increase permitting opportunities for smaller operators, and reducing fire hazards as a result.

Thank you for your attention.  
Eliud Salazar