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Re: The Encino Vista Landscape Restoration Project

I am submitting these comments regarding the U.S. Forest Service's Encino Vista Landscape Restoration Project Preliminary Environmental Assessment. This approximately 130,305-acre vegetation management project is located on the Coyote and Cuba Ranger Districts of the Santa Fe National Forest.

My husband and I have hiked, jeeped, and explored in the Jemez Mountains for about 50 years. We have seen many changes to the forest and its management. Currently, in retirement, we visit at least 4 times a week during the more temperate months of the year. We have seen forested areas with shade and understory reduced to individual trees and weedy, invasive vegetation due to "forest resiliency" treatments. The areas south of Sierra los Pinos (Forest Road 10, San Juan Mesa) are good examples of this heavy handed management. Other areas that we visit frequently have been marked for cutting, and it is depressing to picture what will be left standing and think of these cooler, shaded areas becoming exposed to the harsh sun and wind.

Outdated Scientific Basis

This environmental assessment relies on studies that are not current and on the institutional thinking of the past several decades. It does not take into account more recent studies that have been undertaken by independent scientists.

The agency's assumptions that reducing tree densities and fuel loadings will result in less intense fire behavior is controversial and unproven.

As the climate warms and dries, fuel treatments generally do not tend to reduce the occurrence of high severity fire. In these conditions, extreme weather drives the fire and overwhelms any treatments.

Fuel reduction may increase the fire severity in many cases. Slash is left behind, often for several seasons. It serves as fuel, and cutting trees and leaving the slash can promote bark beetle outbreak. Some studies have found that fires move more slowly through untreated areas than through open, treated ones. When the forest is thinned aggressively, through cutting or burning, the wind carries the fire faster and causes it to spread into the tree crowns more frequently. The micro-climate is hotter and drier, also favoring more intense fires.

Fires are a natural and necessary part of these forests, but prescribed burns do not mimic naturally set fires. They are set at the wrong time of year, negatively affecting wildlife. They are often enhanced with toxic accelerants. Because of the time of year, they do not generally burn like a lightning caused fire. Naturally occurring fires do not happen as frequently as the prescribed burn interval; the data pointing to fire every 10-15 years has been misinterpreted. Prescribed burns should be implemented at long intervals, so the understory can fully regenerate between burns.

Aggressive thinning that removes the tree canopy, such as this Project proposes, creates a hot, dry, weedy landscape instead of a cooler, moister, forest with a healthy understory and forest floor. Forests are not individual

plants and trees; they are complex systems. The forest floor contains fungi and other organisms that allow the trees to communicate with each other. Trees share nutrients among themselves. The understory provides important habitat for the fauna and is an important part of the system. Mechanical thinning damages the forest floor, disrupting the whole system. It requires roads, which turn into ankle deep, powdery dust. When these roads are closed, they recover very slowly, if at all. Where thinning is indicated, it should be targeted, light-handed and manual. It should preserve a substantial forest canopy and native understory that provides shade, holds moisture, and allows the ecosystem to function as it should.

Instead of largely opening up the forest canopy and allowing soils and vegetation to dry out, the Forest Service should focus on maintaining moisture in the project area, which would make trees and the forest more fire resistant and improve ecological function. Strategies to retain moisture include protecting soils and mycorrhizal fungi from intense heat from pile burns, creating berms and dams to retain water, and enforcing the grazing lease regulations. Riparian areas should be restored by planting native vegetation, encouraging beaver habitation, fencing out the cattle, and decommissioning unnecessary forest roads.

Fire is a natural part of the ecosystem, so the focus for mitigating fire effects should be on protecting homes by fireproofing structures and the surrounding 100+ feet of landscape instead of treating forest in the backcountry.?

Condition-based Approach

The environmental assessment does not provide the specificity required by the National Environmental Policy Act (NEPA). The Forest Service should provide detailed, site-specific information regarding existing conditions and how the proposed action will affect forest resources including wildlife, wildlife habitat, streams, and riparian areas.

Treatment parameters and methods for each vegetation type should be much more specific.?

Potential for Escaped Prescribed Burns

In the past decade (2014-2023) three Forest Service prescribed burns resulted in a total of 387,076 acres of the Santa Fe National Forest burning, in three separate wildfires. During the same decade, 27,016 acres burned due to all other causes, including all other human-caused fires.

This history seems to show that current burn practices are not keeping up with the changing climatic conditions. The Preliminary EA does not even mention the possibility of escaped prescribed burns. It needs to acknowledge the possibility that a prescribed burn will get out of control, and have a detailed plan for how the USFS is going to respond. The Plan proposes burning 8,000 acres/year. There is a very real possibility that some of these burns will get out of control.

Prescribed burns are risky, and the Forest Service hasn't adequately addressed the issues specific to the EVLRP area. The agency is endangering our forest and communities by going forward with prescribed burns before developing strategies specific to individual project areas to prevent prescribed burn escapes.

Air Quality

The smoke from Forest Service prescribed burns creates very poor air quality at times. Smoke from burning forests causes increased illness and even mortality. It is not merely a nuisance. It is associated with increased pulmonary, cardiac, immune, and cognitive disorders. The USFS needs to do a Health Impact Assessment, or its equivalent, of the real-world effects on public health of the smoke they generate. The Assessment must include other sources of degraded air quality that are likely to happen at the same time. Other forest fires and prescribed burns and background air pollution which the USFS cannot control are likely to play a part in the air quality at any given time and must be included.

Project Notice

Public notice for the project has been insufficient. There was no public news release; there were no legal notices; apparently no news source was contacted. Due to the lack of publicity, only 14 scoping comments were received.

Notice for the Preliminary Environmental Assessment has also been insufficient. The two poorly advertised open houses had 9 attendees from the public. The meetings used a Q&A format rather than presenting the plan first. That format does not give the attendees the information that they need to ask meaningful questions or offer reasoned comments.

Need for an Environmental Impact Statement (EIS)

An EIS is required when a project has significant impacts on the human environment or on forest resources. This project covers over 130,000 acres and proposes to change the nature of the forest over that area. It clearly has significant impact.

The Forest Service must complete an EIS for the project. It should include a conservation alternative that is developed using more recent studies and considering the changing climatic conditions. It should have substantial input from conservation scientists, conservation organizations, and the local communities. It needs to provide alternatives to the aggressive logging, cutting, and burning treatments that are proposed.

A cost/benefit analysis should be completed for the various alternatives. The cost should include the possibility of escaped prescribed burns. The benefits should be scientifically sound.

?Thank you for considering these comments,

Lauren McGavran