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Organization:

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Mark Sando, Coyote District Ranger

HC 78, Box 1

Coyote, NM 87012-0001

Re: The Encino Vista Landscape Restoration Project

I, Sandra Ingerman respectfully submit these comments regarding the U.S. Forest Service's proposed Encino Vista Landscape Restoration Project, an approximately 130,305-acre vegetation management project located on the Coyote and Cuba Ranger Districts of the Santa Fe National Forest. These comments are submitted in a timely manner. The responsible official is Mark Sando, District Ranger, Coyote Ranger District.

While the entire planet is trying to repopulate trees, you are looking at mass destruction for no reason. I was a firefighter for the Forest Service in Oregon and the only fires I fought were controlled burns that went out of control. What you're doing is immoral and unethical as the loss of life will be huge. The loss of life of old growth trees, animals, birds, insects, plants, other wildlife and people will be unfathomable through all this fire as well as all smoke you will be creating. This is an immoral and unethical project. I join with others who want healthy forests.

#### Best Available Science

This environmental assessment does not utilize the best available science, for the following reasons:

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

Fuel treatments do not tend to reduce the occurrence of high severity fire in a changing climate with extreme fire weather overriding on-the-ground treatments.

Fuel reduction may actually exacerbate fire severity in many cases as such projects leave behind combustible slash through at least one dry season, usually more. Slash piles can also promote bark beetle outbreak.

When the tree canopy is opened up by aggressive thinning and too-frequent prescribed burns, wind can penetrate stands and carry fire into tree crowns.

While fire on the landscape can be ecologically beneficial, the Forest Service proposes to burn too much landscape per year and to repeat burns too often. Prescribed burns should be implemented at long intervals, so the understory can fully regenerate between burns.

Aggressive thinning operations, such as are proposed in the EVLRP, tend to dry out the soil and vegetation, because the forest floor is no longer adequately shaded. Such operations also compact and damage soils, and introduce invasive and flammable weeds. Any thinning should be targeted, light-handed, and maintain a substantial forest canopy and relatively natural and abundant native understory that holds moisture into the ecosystem, instead of drying it out.

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 forest more fire resistant and improve ecological function. Strategies for accomplishing this include protecting soils and mycorrhizal fungi from intense heat from pile burns, creating berms and dams to hold water into the forest, fencing out cows, planting native vegetation in riparian areas where needed, promoting beaver habitation, and decommissioning forest roads, which can cause water run-off and erosion.

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.

Despite these fires, and the severe impacts the fires had on communities, including several hundred homes burned and lives and livelihood severely affected, the Forest Service did not analyze the potential for escaped prescribed burns in the Preliminary Environmental Assessment, nor provide mitigations specific to the project. In fact the potential for escaped prescribed burns was not mentioned in the entire Preliminary Environmental Assessment.

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, without developing strategies specific to individual project areas, to avoid prescribed burn escapes in a warming climate. The Forest Service does not have the agency capacity to safely implement 8,000 acres of prescribed burns per year during the EVLRP, and also implement many thousands of acres of burns in the implementation of other Santa Fe National Forest projects.

Broadcast prescribed burns should not be implemented in the spring due to the unpredictable spring winds in the Santa Fe National Forest. They should only be carried out in the fall and winter. Pile burns should only be implemented when substantial snow is on the ground.

Any unburned slash piles in the project area must be addressed, preferably by chipping or lop and scatter, before cutting any more trees.

Air Quality

The smoke from Forest Service prescribed burns is creating very poor air quality at times, which is associated with serious health impacts for vulnerable populations. Such impacts include increased asthma, COPD, vascular and heart disease, immune system disorders and cognitive disorders. The Forest Service must do a Health Impact Assessment, or an equivalent, of the real-world effects on public health of the smoke they generate.

The smoke from burning 8,000 acres per year is far too much in relation to public health, especially considering other projects will also be producing large amounts of prescribed burn smoke. This amount of burning may cause serious health impacts to the public. Real-world health impacts must be considered.

Project Notice and Environmental Justice

Public notice for the project has been insufficient. The notification of the scoping document was mailed to only 143 people. The agency issued no public news release, placed no legal notice in a newspaper, and contacted no news source to announce the project. This generated only 14 scoping comments.

Notice for the Preliminary Environmental Assessment has also been insufficient. Two poorly advertised open houses resulted in only 9 attendees, other than USFS personnel. There were no meetings held in which an overview of the Preliminary Environmental Assessment was presented to the public; instead, the agency used an open house format for answering attendees' questions.

The Forest Service also has a responsibility under its regulation, "Requirements for Public Participation," to provide opportunities for engagement about projects and encourage participation by low income and minority populations.

The project area contains largely a low-income rural population, and in many cases, English is not the primary language. Therefore, the outreach by the Forest Service to the local population would be expected to be much more, not less than that for projects affecting areas of average demographic characteristics.

Environmental Impact Statement (EIS)

An EIS is required when a project has significant impacts on the human environment or on forest resources. This project clearly has significant impacts.

The Forest Service must complete an EIS for the project. It should include a conservation alternative that is developed with substantial input from conservation scientists, conservation organizations and the local community, and provide alternatives to aggressive logging, cutting and burning treatments.

A cost/benefit analysis should be completed to determine whether the benefits of widespread and aggressive

tree cutting and prescribed burning outweigh the risks and costs. Costs include ecological costs and social costs.

Thank you for considering these comments,  
Sandra Ingerman