

Sarah Salazar

April 6, 2024

Mark Sando
District Ranger, Coyote Ranger District
Santa Fe National Forest (SFNF)
HC 78 Box 1
Coyote, NM 87012

RE: Encino Vista Landscape Restoration Project (EVLRP) - Draft Environmental Assessment (EA) - Public Comment

Dear Mr. Sando,

I appreciate the opportunity to provide the following comments on the EVLRP Draft EA document and Project. My perspective is informed by my experience, summarized below. My experience is directly from Cañones, but my concern extends to all communities in the vicinity of this Project, as they are all interconnected by family and experience.

My family spends a lot of time near and within the Project area year-round, and I am very concerned about the impacts of this Project. My husband's family is part of the historic and traditional community of Cañones, at the northeast perimeter of the Project area, are heirs of the Juan Bautista Valdez Land Grant, and part of local acequias. Our young son is growing up in the traditions of his Cañones family, learning land-based practices from his elders.

The protection of the Cañones Creek watershed is critical to our family's history, traditions and 100+ year old ranch, irrigated from an acequia flowing from Cañones Creek. We love taking our son to the forest around Cañones Creek and playing with him near the still-standing corral built by his great-, great-grandfather before this area was part of the Forest, when he would travel all the way by trail on foot and horseback to summer grazing. In his youth, my husband helped in this effort alongside his dad and grandpa under a grazing permit, and counts this among his most impactful memories. Our son knows how to identify osha and our family often uses this traditional medicine. He also fishes alongside his grandpa, hearing the stories of when fish were plentiful downstream.

A close family member learned timber harvesting from his grandfather and father. He made his living from small timber harvesting of vigas, posts, beams, poles, latillas and

similar traditional building materials, just as his father, grandfather and great-grandfather did before him. This timber was primarily from the Project area, until SFNF leadership and procedural changes limited access to harvest opportunities, even of deadfall, driving him to shift to another industry. Another close family member makes a living farming the land.

As an Architect, I have designed and managed several projects with community engagement as part of the process. From that experience, I feel that this Project has not afforded local communities adequate opportunity for meaningful engagement and consideration.

I have also read and thoroughly reviewed many documents relevant to this Draft EA including the July 2022 Santa Fe National Forest Land Management Plan, the September 2022 USFS National Prescribed Fire Program Review, watershed GIS maps, EVLRP Scoping document and Comment Analysis and more. I attended the public meeting in Abiquiu on April 23rd and spoke with several subject matter experts present.

My top concerns with this project are: Protection of all watersheds and headwaters (i.e.- Cañones Creek, Coyote Creek, Rio Puerco); Escape of prescribed fire; Failure of SFNF to recognize critical unique characteristics of this place; and Waste of Forest resources through management and treatment decisions.

From research undertaken and personal experience, I have the following concerns, questions, and suggestions for improvement:

- **This Draft EA document does not provide adequate understanding or basis for this Project and more and better analysis and review is needed;**
- **This Draft EA does not evaluate or consider drought conditions**, which is a finding and recommendation of the 2022 USFS National Prescribed Fire Program Review to reduce risks of prescribed fire escapes. A large majority of planned Project treatments include prescribed burning;
- The current condition of the forest is susceptible to fire due to many factors such as blow-downs, beetle kill, drought, and years of procedural restricted access to remove and use deadfall timber. The general purpose of the Project to reduce risk of devastating wildfire is good, but the planning and actions need to be done correctly to realize acceptable outcomes and lower risks;
- **The SFNF staff contributing to planning, analysis and execution of this Project are primarily new arrivals from outside the State, with little to no awareness of land grants, acequias or local history, most of whom have never been to the Project area.** (FW-RURALH-MA) This context information is in the SFNF Land Management Plan, which should be required reading for staff. This was confirmed by conversations with several Project subject matter experts at the public meeting. Cultural and Rural Historic Communities are a big component of the Environment being impacted by this Project

and the EA reveals a lack of awareness or understanding of this context (example - **Analysis states there are expected negative impacts of Project actions to the Cañones Creek watershed lasting several growing seasons with no provision for water safety monitoring or alternate safe source, risking livelihoods and traditions of the historic community of Cañones downstream**). Therefore, this EA is not adequate basis for the Project to move forward;

- A common concern voiced by Project staff at the public meeting was **lack of personnel and funding**.
 - ❖ Staff reason for not providing more access to fuelwood or traditional building timber resources, and instead just burning it was “lack of funding and personnel.” This was also the reason given for not planning more timber sale units of any size.
 - ❖ The approach to timber harvest and road service funding and contracts should be reconsidered and combined. For example - “pay” small local timber operators who are also qualified contractors to complete road improvements, road creation and road closure with the timber, resulting in service for product as a fair exchange at no real cost to the SFNF and great benefit to local operators. It is my understanding that all of the roads in the Project area, including the gravel roads, were built and surveyed by local people and logging operators, some of whom are still around.
 - ❖ Staff indicated that large project contracts were difficult to execute and complete, including a challenge with getting enough bidders to respond. I recommend looking to more, smaller projects under certain dollar thresholds for improved ease of purchasing and procurement.
 - ❖ How will the SFNF ensure adequate resources are available to complete actions for this very large Project, in a very remote area, adequately and safely?
 - ❖ 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 to other industries, are well qualified in identifying marketable and commercially viable areas, marking trees and assessing access potential. They could provide the overworked staff with valuable information and capacity to increase permitting opportunities for smaller operators, reducing fire hazards as a result.
- **This Draft EA shows this Project is not in alignment with the 2022 SFNF Land Management Plan and does not adequately consider many of the findings of the 2022 USFS National Prescribed Fire Program Review following the devastating Calf Canyon-Hermit Peak fires.** For example:
 - ❖ The proposed area for timber sale is currently very small relative to project area (~7,300 of 130,305-acres or <6%), whereas the SFNF Land Management Plan sets

targets of 10-40% timber harvest. Further, the 2022 USFS National Prescribed Fire Program Review findings highlight the need for more flexibility in timber unit size and type to achieve fuels reduction goals, instead of relying on only larger units. **For this Project, there need to be many more smaller sized timber sale units available to smaller, local operators. There needs to be less area designated for thinning / burning treatment.** As a bonus, smaller operators tend to use smaller equipment, reducing land impact and lowering need to alter roads for equipment accommodation. The large planned units will more likely be sought by large non-local operators. Also the Project must consider that without contract provisions and preferences for local contractors and labor, there is no assurance that any locals will see economic benefit as claimed. Such preferences and contract requirements need to be mandated for this project.

❖ **The smaller trees this EA calls un-marketable at ≤ 12 " diameter, and calls for mastication or burning of, are often the size for useable traditional building materials that the SFNF Land Management Plan and this Draft EA frequently claim will be made accessible and available to traditional community members.** Fuelwood is also stated to be available to traditional communities. These intentions need to be mandated for this Project to ensure they are upheld. (FW-RURALH-G)

❖ Over again, SFNF plans and this Draft EA claim an intent to provide access to culturally important resources to traditional communities. However, SFNF appears to have no policies or procedures in place for ensuring or providing this access, or allowing for preference of traditional community members on contracts for timber sales, for example. Without such policies and procedures in place, the stated goals and intent of these plans will not be achieved. (FW-RURALH-G)

• **The analysis in this Draft EA relies heavily on modeling, with admittedly inadequate and unverified input data.**

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

❖ **The most impaired watershed in the Project area, Cañones Creek, is not directly analyzed. Instead, the EA analysis includes only Coyote Creek as a proxy for all others, while being smaller and less complex than Cañones Creek and with much less agricultural acreage dependent upon it.** This is inadequate. All of these watersheds feed into the Abiquiu Dam, a major water source for a lot of agricultural users and large city centers downstream.

❖ It is not clear whether prescribed burn areas will be determined in a manner that reduces watershed impacts like water quality and peak flows by using smaller burn areas and allowing ground over to recover in between.

- ❖ Why isn't this stage of planning based on more real data from the Project area, and how will SFNF ensure that modeled assumptions are not biasing Project direction and decisions prematurely, while still lacking adequate data or field verification?
 - ❖ What is the procedure going forward for delineating the assumptions upon which planning is based that must still be verified before finalizing action plans?
 - ❖ Are the models built around data and assumptions from very different locations, due to lack of local data, that result in modeled outcomes representing an entirely different location? This place is not comparable to places like Oregon or Washington where many subject matter experts involved on this project seem to be from and gained their experience.
 - ❖ Local on-the-ground observations indicate more frequent and more intense, damaging 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 EA indicates timing controlled burning based on predicted wind direction, ventilation and atmospheric conditions. Cañones is in a narrow canyon and regularly sees varied conditions relative to surrounding areas like gusting down-canyon from the higher elevations just before sunset, which would allow smoke to infiltrate heavily. This happened immensely during the 2010 adjacent wildfire. How will these conditions be planned around or accurately modeled to ensure Cañones doesn't experience negative smoke impact from planned burning? Saying that the smoke impacts will be present but "short-term" is inadequate for those living in Cañones. Many local residents suffer from asthma and other respiratory conditions. Many do not have the option to relocate temporarily at the convenience of planned burns because animals must be fed, crops watered, and disposable income for alternative accommodation isn't available. Cleaning a home of soot and smoke is also a massive undertaking after the fact.
- Project Purpose & Need:
 - ❖ The Project Purpose should include protection of cultural and historic resources including supporting traditional communities' use of national forest lands as part of their living culture - Consistent with the description of Restoration Needs for this Geographic Area in the SFNF Land Management Plan.
 - ❖ The Project Need should also include restoring and fostering relationships with Rural Historic Communities including land grant and acequia associations.
 - 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 (FW-PARTNER-MA), 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. This is a major finding/recommendation of the 2022 USFS National Prescribed Fire Program Review. A few ideas include:

- ❖ **A local traditional community liaison should be hired or contracted as 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.
- ❖ **A local traditional community liaison should be hired or contracted as part of completing Appendix C - Prescribed Fire Plan Template, Element 2B Go-No Go, Item A.**
- ❖ This inclusion of local knowledge in burn plan decisions should be implemented as a policy of the SFNF. (FW-RURALH-G)
- ❖ A local linguist should be hired or contracted to respectfully engage with local communities in their language on behalf of the USFS and SFNF. (FW-RURALH-G)
- **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;
- Cerro Pedernal is entirely missing as a feature from this analysis. Pedernal should be considered for its wide cultural importance and be given a careful approach for treatments;
- Monitoring: Land Grant Communities should be included in a Project monitoring indicator of annual satisfaction for Cultural Resources and Traditional Uses, much like how tribal communities are in the SFNF Land Management Plan, as they are living in very close proximity to this Project area;
- The only specific mention of planting trees is for the area of the 2023 Black Feather Fire. This Project should include more planting of trees throughout the Project area, both for restoration of landscape and future resource harvesting opportunities. Planting of trees should focus on species like Douglas fir and engleman spruce. Local communities and volunteer involvement would be good partnership opportunities. There may also be opportunity for revenue from carbon sequestration markets to offset costs.
- **Acequias are missing from the EA analysis**, while Mutual Domestic Water Consumers Associations are named individually. (FW-RURALH-G)

- The EA analysis indicates a benefit of Project actions to acequias will be more water available. If this means an expected surge in volume, this would not benefit acequias as acequias intentionally limit surges and surges can damage acequia infrastructure. This analysis conclusion is concerning as it may indicate problems upstream;
- The EA and Project do not consider broader treatment options, beyond only large timber sale units and prescribed burning, such as the successful program underway in the nearby Carson National Forest that builds partnership between communities and the FS toward the common goal of fire risk reduction. **This Project should incorporate a collaborative restoration program like the Carson NF's Collaborative Forest Landscape Restoration Program (CFLRP).**

Finally, I offer congratulations on your upcoming retirement, Mr. Sando, but I have concerns about the transition of your position at such a critical phase of this Project. **I respectfully request that the decision authority for this Draft EA and Project be reassigned to the Santa Fe National Forest (SFNF) Supervisor** to ensure adequate accountability of Project decisions and outcomes.

Thank you for this opportunity to provide public comment and for your attention. I would appreciate serious consideration of and responses to my questions and concerns, and continued communication of Project developments going forward.

Respectfully Submitted,

Sarah Salazar