SANTA FE FOREST COALITION

June 12, 2019

Mr. Alan Webber, Mayor
City of Santa Fe
200 Lincoln Avenue
Santa Fe, New Mexico 87501
delivery via email: mayor@santafenm.gov

re: request to speak on the Santa Fe Mountains Forest Resiliency Project

Dear Mayor Webber,

We respectfully request an opportunity to speak at the City Council's Wednesday June 12 afternoon session concerning the presentation by SFNF Supervisor Melonas and Alan Hook, Water Resources Coordinator, regarding the Santa Fe Mountain Forest Resiliency Project (Project). Issues to address include:

ENVIRONMENTAL IMPACT STATEMENT (EIS)
The National Environmental Policy Act (NEPA) requires that the Forest Service take a hard look and consider in depth the environmental consequences of their proposed actions. For actions with significant impacts a detailed EIS must be prepared that examines alternatives, including preserving forests in their natural condition, and documents unavoidable adverse effects. In this case a lesser Environmental Assessment (EA) is being prepared to determine if a proposed action warrants an EIS. An important distinction is that in an EIS mitigation measures to protect soils, water quality and wildlife habitat are mandatory, instead of discretionary. In addition, all scientific evidence must be evaluated, not just studies that support a proposed action.

An EIS is clearly warranted in this case. The Project is one of the largest single vegetation management schemes ever proposed on the the SFNF. It is more than twice as large as the EIS prepared for Santa Fe Municipal Watershed project in

2001 and nearly as large as the EIS prepared in 2015 for the Jemez Mountains Landscape Restoration project.

At least three inventoried roadless areas will be affected potentially making them unsuitable for future Wilderness designation. Up to 94 miles of little used roads will be improved allowing increased access to the biological strongholds of imperiled species, including the threatened Mexican spotted owl and nearly 70 species of breeding songbirds. These unfragmented forests serve as a bulwark against the spread of invasive plants and animals and provide unparalleled opportunities for outdoor recreation critical to Santa Fe's economy. They also encompass sacred sites used by Native Americans to maintain traditional spiritual and religious practices. Most importantly, clearing vegetation and burning in the backcountry does nothing to improve the safety of residents living adjacent to the SFNF.

INVENTORIED ROADLESS AREAS

In 1964, Congress passed the Wilderness Act that created the Pecos Wilderness. Most of the project's 50,566 acres are inventoried roadless lands on the western slopes of the Pecos Wilderness. The Santa Fe City Council has unanimously passed resolutions supporting Wilderness designation for these lands.

Roadless forests are recognized as significant because of their their unique ability to provide clean and abundant water supplies, clean air, superior wildlife habitat and outstanding recreational opportunities. In 2006 the NM Department of Game and Fish issued a report on threats to the state's 1.6 million acres of roadless forest saying:

> Roads, road-building, and the associated traffic they encourage, create a cascade of adverse effects to the forest ecosystem. These include stream sedimentation, reduced water quality, introduction of undesirable non-native plants and animals, habitat fragmentation that adversely affects fish and wildlife populations, and increased unintentional man-caused wildfires.

The 2001 Clinton administration's Roadless Rule protects roadless forests by prohibiting most logging. In recognition of these values, Forest Service procedures specifically require a detailed analysis of proposed actions in roadless forests that threaten wilderness values, including the cumulative effects of continuous clearing and burning on ecological processes.

According to the Forest Service, the purpose of this project is to reduce the occurrence of infrequent but not unnatural high-severity fires. However, such fires burn most intensely in heavily logged areas such as in the Jemez mountains where

several large-scale fires have burned. Roadless areas, wilderness and national parks burn in a complex mosaic lending to the development of forest structures that maintain biological diversity and resiliency.

PUBLIC HEALTH

Increasingly large areas of forests above Santa Fe will be burned every year using low-intensity prescribed fires that produce high particulate smoke emissions. This would expose affected citizens to far more smoke particulates over time than emissions produced by an infrequent high intensity fire. There is no known safe level of exposure to small particulate matter in smoke (< 2.5 microns in size) below which health impacts are not observed. Public health officials have called for further studies to determine risk.

Exposure to small particulate matter in smoke may aggravate underlying medical conditions of the heart and lungs. Inhaled particles can also alter immune function by diminishing the ability of immune cells to remove foreign materials like pollen and bacteria from the lung, predisposing a person to lung infections. The exposure can result in reduced lung function, even in healthy people. Respiratory complications of smoke exposure is of particular concern in the very young, and in older individuals.

According to the Forest Service, smoke also contains the following toxic air pollutants: formaldehyde and acrolein (both potent eye and respiratory irritants), benzene (a known carcinogen that can cause headaches, dizziness, and breathing difficulties) and polycyclic aromatic hydrocarbons (PAHs). Where heavy metals occur in the soils (e.g., copper, chromium, lead, zinc, or mercury), certain plants can uptake those metals and concentrate them in their tissues. If this vegetation is burned, significant metal emissions result. Furthermore, if heavy metals are precipitated onto the plant surface from other pollutant sources (e.g., coal fired power plants and automobiles) these metals are emitted into the atmosphere upon burning.

Prescribed burns and wildfires in 2002 accounted for the second highest total of mercury released in New Mexico, approximately 20% of the total or 1171 pounds. Mercury released into the atmosphere is eventually deposited into soil, vegetation and surface waters. Biological processes in water and soil convert elemental and inorganic mercury into methylmercury, which is taken up by small organisms in the food web. Mercury is a neurotoxin and can damage the brain, kidneys and lungs. Unborn and young children are the most susceptible to the toxic effects of mercury. Pregnant and nursing mothers can pass mercury to the developing fetus or infant. Vulnerable populations to mercury and other hazardous compounds include the young, the elderly, asthmatics, chemically sensitive individuals,

pregnant women and those with cardiovascular disease. The total percentage of these vulnerable populations in New Mexico amounts to 87% of the general population.

In considering the potential significance of air pollution and release of toxic substances from prescribed fires so close to Santa Fe, the Forest Service must prepare an EIS using the best available scientific information.

CLIMATE IMPACTS

New Mexico's abundant forests readily absorb and store massive amounts of carbon in trees, dense foliage, and productive soils. However, when millions of trees are cut and burned more than half of their stored carbon is released into the atmosphere.

This project which calls for clearing vegetation and intentional burning every 10 to 15 years has the potential to release far more carbon into the atmosphere than occasional wildfires. Studies from the Pacific Northwest show carbon stored in national forests can be doubled if protected from logging and harvest rotations are extended on private lands. An EIS must be prepared to take a hard look at the cumulative climate impacts of projects such as this in the New Mexico.

RISK ASSESSMENT

The Forest Service relies on antidotal evidence to promote the notion that intensively managed forests will stop climate-drive fires and control their spread. Large studies of dry forests in the west find little evidence to support this conclusion.

But even if the Forest Service is correct, the chance of a large fire encountering a managed tract of forest before flammable shrubs and trees return in 10 to 15 years is minimal. Forest Service researchers are well aware of this fact, arguing that many fuel reduction projects are a waste of taxpayer dollars. Instead of reducing risk, cleared areas may become more flammable by encouraging the growth of combustible grasses, shrubs and small trees and opening forests to drying sunlight and wind. This heightened risk needs to be evaluated in an EIS.

We urge you to ask for the preparation of a comprehensive EIS for Santa Fe's headwater forests that would meaningfully engage the public and provide a full and fair discussion of significant environmental impacts.

Thank you for the opportunity to provide information on this proposed Project.

Sincerely,

/Sam Hitt/

Sam Hitt, President
Santa Fe Forest Coalition
P.O. Box 1943
Santa Fe, New Mexico 87504
505-438-1057
sam@wildwatershed.org