

Comment letter Truchas to Upper Costilla Headwaters Active Management Project

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Mr. Jame Duran
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Subject: Comments on Truchas to Upper Costilla Headwaters Active Management Project

Mr. Duran,

I recently attended the McGaffey Ridge Project ad part of a field Visit. The filed visit went well. The McGaffey Ridge project viewed was touted as an example of the treatments expected in the future and future vision for the watershed. Overall, a good presentation by the Forest Service and some of the other entities involved.

However, it would appear a big hammer was used with some but limited oversight on the ground. The slash remaining was well scattered. Basically, low to the ground, and nearly ready for a broadcast burn. The problem with the large hammer on this project was the treatment of differing plant associations (see Plant Associations of Arizona and New Mexico, Edition 4 Volume 1: Forests, 2023-2024, Region 3 USDA Forest Service) was exactly the same with exactly the same results expected. Standing in the meadow during the McGaffey trip at least two differing plant associations were obvious, Ponderosa pine/Arizona fescue (PIPO/FEAR) and Ponderosa pine/ Gambel Oak (PIPO/QUGA)..

These two plant associations respond in a similar way but yet in different ways. The overstory residual was the same or nearly the same in both instances. The PIPO/FEAR plant association with some oak in the understory will as other forestry practices on the Carson NF have shown the oak will respond to the increased light but not spread from the existing clumps in a measurable way. The PIPO/QUGA plant association after having the overstory opened increasing light on the ground will respond in a much more aggressive way. The oak in this instance will begin to spread out of the existing clumps into the opening around the clumps. There are areas on the Carson NF where the overstory consists of scattered ponderosa pine in the overstory and a nearly

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impenetrable oak stand in the understory. In this case, the area becomes a death trap for wildland firefighters. due to the reburn potential of the oak stand.

The proposed Truchas to Upper Costilla Headwaters Active Management Project is looking at treating approximately 491,942 acres of national forest lands on the Questa and Camino Real Ranger Districts. These treatments would be done on historically frequent fire ponderosa pine stands and dry mixed conifer stands. The use of these general descriptions of the treatment areas is inadequate. The use of a broad definition is not appropriate for the on the ground treatment. The use of the Ecological Response Unit is appropriate for the general discussion in the Environmental Assessment. The on the ground treatment must use the plant association level of fine tuning for active treatments. The dry mixed conifer also has the same oak response in the differing plant associations a does the ponderosa pine plant associations.

The draft EA discusses some public involvement. This is a story that needs to be discussed in the to be affect local communities before it is completed and the decision signed. The neighborhoods around the Taos area/San Cristobal area/Lama area were not well informed of the level of treatment on the national forest lands adjacent to the private property boundaries. There is a growing opposition to the treatments as explanations were not done prior to the treatments.

I do expect that the treatments proposed will go to the boundary lines of the national forest. A buffer zone is not appropriate unless the terrain is either steep/rocky/cliff or of similar features. Known wildlife corridors on adjacent lands and national forest lands should be preserved if possible.

The silvicultural report used the Stand Density index as part of the reasoning for the project. The Stand Density index as developed was for even-aged stands not the basically uneven-aged stands described in the project area descriptions given to the public. Interesting to note the Forest Service in Region 3 pushed even-aged management on small stands for many years contributing to larger uneven-aged areas across the forest landscape. Seems times never really change but differing words are used. The use of the Stand Density Index may be mandated by the powers above but the question will always remain is it the proper measure to use. The public does not understand this measure. Basal Area is an easier measure to use and explain to the public.

Removal of the woody products is not adequately addressed in the draft EA not in discussions. The amount of material generated in the proposed treatment outpaces the amount of wood used for personal use and the capacity of nearby milling operations. The question really becomes disposal of the materials. Chipping is likely prohibitive in cost both in terms of labor and machinery, mastication is a possible option but often leads to public opposition due to the large machinery and heavy hammer approach, thinning and leaving the slash and woody materials on the ground causes an eyesore for the public and increased fuel loadings, burning is an option but based on the recent experience in the nearby area the trust level is low to below ground level. There is

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some good work being done in the burning arena but still more work needs to be done with the public. Forest Service employees need to be listeners not tellers. It is okay and meaningful to the public to say "I hadn't thought about it that way. Thank you for your comment." Listen first then respond in a none scientific way without using the jargon. Describe the terms being used simply and distinctly. Oldtimers understand board feet but hundred cubic feet (CCF) is not easy to understand.

Where state funding is used to treat some of the national forest through cooperative agreements the state forestry division should take the lead in discussions with the forest service in a supporting role. Some of the funds used in the MCGaffey project as viewed on September 11, 2026 were state funds yet the project forester did not make any comments or give any explanations of the treatment, interesting.

On April 4, 2025 the Secretary of Agriculture determined that the Forest Service may carry out Authorized Emergency Actions under section 40807 of the Infrastructure Investment and Jobs Act (PL 117-58) on National Forest System lands that are either, (1) rated as very high or high for wildfire risk or (2) experiencing declining forest health, at risk of experiencing substantially increased tree mortality over the next 15 years from insect and disease infestation, or contain hazard trees posing an imminent risk to public health, infrastructure, and safety. These emergency actions are taken to achieve relief from threats to critical infrastructure or public health and safety, or to mitigate threats to natural resources. Projects proposed under emergency authority must be approved by the Forest Supervisor. Forest Supervisor James Duran approved the Forest Health and Hazardous Fuel Emergency Action Determination on November 9, 2023. The purpose of this emergency determination is to mitigate harm to life and property adjacent to National Forest System land; control insects and disease; remove hazardous fuels; and protect and restore water resources and infrastructure. This designation basically gives the Carson National Forest Permission to go forward with minimum public input to changing or modifying the proposal.

I fully expect in about year 10 when the budgeting process of the government does not allocate funding for say burning or thinning this project to top dead in its tracks. Treatments will not follow and the current conditions on many of the areas will not change.

There is a picture of the Shuree lodge area hanging in Las Vegas, New Mexico. It shows the hillsides nearly barren of trees. It is an oblique aerial photo and is very interesting. Retrieval of a copy of this photo would be beneficial for explain the current conditions of this area.

One item this is mentioned in the draft EA or at least alluded to is "climate change". The term "climate change" was first bantered about in the early 1930's. Since no one is alive who remembers that time period is a succent way in this local area use of "climate change" is unwarranted. Weather changes, earth temperatures have been warmer in the past (tropical areas across the earth producing coal are examples).

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Wilderness areas which include ponderosa pine and dry mixed conifer areas should be included in the project. The areas east of San Cristobal in these ERUs should be included in the project as similar areas near Questa and Taos/Taos Ski Valley.

Piling and burning of the slash and or left over log decks is not appropriate. The damage to the soils is often evident 20 years or longer after the burning. Several research publications indicate long term damage to soils from the increased heat of the pile burning. TreeSearch can be used as a resource for these publications.

Am I in favor of this large of a project treating more fire prone areas and reintroducing fire use to the forests, yes. My concern is not doing anything will continue to allow buildup of fuels and the possible natural start (lightning) of fires which will take entire watersheds necessary for the downstream communities.

Thank you for this opportunity to comment.

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