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Comments: On behalf of Carson Forest Watch, the following are comments regarding the Truchas to Upper Costilla Headwaters Active Management Plan:

1) While we support making the projects compliant with the current Forest Plan, we have concerns that numerous acres were recently treated and are currently being treated under the old Forest Plan.

There should have been a supplemental NEPA document prepared to bring them up to date.

2) To determine the environmental affects and base any decisions to thin or burn on sound science, the Forest Service must disclose how many acres have been thinned, burned, affected by wildfires, and disturbed and changed structure in recent years. A true picture of on the ground conditions can't be looked at without disclosing these conditions and changes in the forest being analyzed. And to address purpose and need. Hundreds of thousands of acres in this analysis area have been impacted and the Forest Service needs to address this. Almost every community from Truchas to Costilla has had recent thinning and/or burning treatments, in just the past several years. Yet now the Forest Service is proposing nearly 105,000 more acres of forest near communities to have trees cut or burned or both. The cumulative effects of this on wildlife, soils, climate, and future forest needs to be addressed.

3) We remind the Carson of the M.O.U. signed between the State of New Mexico, Colorado, the Dept. of Wildlife (formerly Dept. Game and Fish), Colo. Division of Wildlife, and the Forest Service to promote and protect and maintain connectivity corridors for wildlife. Because of numerous thinning and burning and wildfires on Carson Forest Service land, especially in the areas being analyzed in this Dreaft E.A.- hundreds of thousands of acres of forest have been fragmented and connectivity lost for wildlife. This is the case all the way from Truchas to Costilla . Much of the Pecos Wilderness is above treeline and the best suitable wildlife habitat is lower and adjacent- in the very areas that have been altered and fragmented by fires and thinning projects, and are now being proposed for yet more treatments. How will the Forest Service insure that corridors of intact forest free from disturbance will be maintained and protected for wildlife in this proposal?? From the project description, it appears to only further fragment habitat for wildlife and break up corridors for wildlife to disburse and breed and have connected suitable habitat and habitat security and cover.

Finally, the affects of over 22 years of drought and warming and changing forest conditions need to be fully addressed in this NEPA document. Acres and acres of forest have been lost or weakened, in addition to the many acres of trees that have been removed from thinning and burning, thus making the need to have intact stands and protected areas all the more important. We have seen a huge loss of shade and cover in the many acres that have been thinned and burned- which is drying out our forest soils even more when combined with our on-going drought. Acres of forest have been opened up, subjecting them to further drying and erosion. This proposal has a goal to protect watersheds- and so it's critical that the best science be used to do what most keeps soils and waters shaded and protected from erosion and compaction in the warming and drying conditions we are experiencing throughout the Southwest. The numerous miles of roads being proposed in this Draft EA for access for the treatments will only further degrade our forest soils and fragment more wildlife habitat. Once opened- even so-called temporary roads never get fully closed and become legal or illegal system roads . The Carson needs to demonstrate it has the funding and staffing to decommission the roads being proposed once the projects are completed. In over 40 years of monitoring projects on the Carson, I've never seen the road closures fully implemented and increasing use of ATVs and off-road vehicles makes the road issue something that needs more attention to protect soils and wildlife.

Thank you and please address the above concerns in the final decision. With our changing climate, more care needs to be taken when considering more removal of trees which provide a crucial buffer to warming temps. both

in NM and on the planet. If reducing fire risk as well as protecting watersheds is the goal- then more roads and less shade won't achieve that goal.