Data Submitted (UTC 11): 9/24/2026 6:00:00 AM
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Comments: September 24, 2026

Carson National Forest Attn: Truchas-Costilla Active Management Project

208 Cruz Alta Road Taos, NM 87571

Submitted via project comment portal

Re: Letter of Support [mdash] Truchas to Upper Costilla Headwaters Active Management Project, Draft Environmental Assessment

Dear Forest Supervisor Duran and the Truchas-Costilla Interdisciplinary Team,

I am writing to express strong support for the Truchas to Upper Costilla Headwaters Active Management Project as described in the Draft Environmental Assessment. This is a well-reasoned, urgently needed proposal to restore healthy, fire-adapted forests across nearly 492,000 acres of the Questa and Camino Real Ranger Districts, and I encourage the Carson National Forest to move forward with implementation as proposed.

The Need for Action Is Clear

The forests in this project area are in poor health and the EA does a good job explaining why. Trees are packed in far more densely than they were historically, and this overcrowding is stressing them out, making them more vulnerable to insects, disease, and drought. Because these forests evolved with frequent, low-intensity fire, decades of fire suppression have allowed fuel to build up to dangerous levels. The EA's own fire modeling shows the difference this makes: under current conditions, a bad wildfire could burn as intense crown fire across nearly two-thirds of the project area. After the proposed treatments, that risk essentially disappears, with the vast majority of the landscape instead expected to burn as manageable surface fire.

That is the difference between a fire our forests can survive and a fire that can destroy them along with the communities nearby.

I support treating this landscape at a broad scale rather than only doing thin buffers immediately around homes and towns. The EA explains that a narrow, structure-only approach was considered and rejected because it would not meaningfully reduce the risk of large, damaging fires or protect the watersheds that these communities depend on for drinking water and irrigation. I agree with that conclusion. Piecemeal treatment has not kept pace with the problem, and it is time for a comprehensive approach.

Forward-Thinking Leadership Deserves Support

The Carson National Forest deserves real credit for taking on a project of this scale rather than continuing with the smaller, slower, project-by-project approach that has defined fuels work in the past. It would be far easier to put this off, or to only treat small areas right around towns. Choosing instead to plan for meaningful restoration across the whole landscape, in coordination with local partners and collaborative groups, shows genuine leadership and a willingness to tackle the problem at the scale it actually exists.

That kind of leadership matters because this work is likely to be misunderstood by some members of the public,

at least at first. Most of us have only ever known these forests in their current, overgrown state. To someone who has spent their whole life around here, a thick, dark, tightly packed forest can look normal, even healthy, while a thinned, more open forest can look disturbed or damaged. But that reaction has it backwards. The crowded forest we see today is not the natural or historic condition [mdash] it is the result of a century of fire suppression, and it is the version of the forest that is actually unhealthy and at high risk of being wiped out by fire. The open, sunlit, more spread-out forest that results from restoration work is closer to what these mountains looked like for thousands of years, and it is far better able to survive fire, drought, and insects going forward. I hope the Forest Service continues to explain this clearly to the public, because a knee-jerk reaction against thinning and prescribed burning [mdash] based on a mistaken idea of what a "normal" forest should look like [mdash] is exactly the kind of pressure that could slow down work the forest urgently needs.

This Is Restoration, Not Just Logging

I want to emphasize my support for the project's framing of this work as ecological restoration rather than commercial timber harvest. The plan prioritizes keeping the oldest and largest trees on the landscape and is designed to bring back a more natural mix of tree ages and open, park-like stand conditions rather than clearing forests or targeting big trees for removal. Where trees are removed, it is because doing so helps the forest as a whole become healthier and more resistant to fire, insects, and disease [mdash] not because of commercial value. I also appreciate that the project continues to support fuelwood access for local families, mayordomo-style community thinning projects, and personal-use permits, all of which reflect the long history of people relying on these forests for their own needs.

Fuelwood Access for Local Communities Must Remain a Core Priority

I want to strongly emphasize the importance of fuelwood access for local residents as part of this project. In northern New Mexico, fuelwood is not a recreational amenity or a minor byproduct [mdash] for many households across Taos, Rio Arriba, Mora, and Colfax Counties, it is how families heat their homes and cook through long, cold winters. Many of these households have limited incomes and have relied on the Carson National Forest for wood for generations, often through traditional practices like mayordomo-organized thinning that go back to acequia governance itself. As this project moves forward and generates large volumes of thinned material, making that wood genuinely accessible to local people should be treated as a central goal of the project, not an afterthought to commercial sales or biomass removal.

This matters just as much for practical, on-the-ground reasons as it does for tradition. The Carson National Forest already deals with a persistent problem of illegal and unauthorized wood cutting, and much of that activity is driven by simple necessity: people who need wood to heat their homes but cannot easily get a permit, find an open collection area, or reach material through legal roads will often cut wood anyway, wherever they can find it. Illegal cutting is harder to monitor, can target the wrong trees in the wrong places, and undermines the careful species and size retention that this project is designed around. The most effective way to reduce that problem is not more enforcement [mdash] it is making legal access easy. If the Forest Service designates generous, well-publicized fuelwood areas along roads that remain open during and after treatment, keeps permit costs and paperwork simple, and continues to support community-based models like mayordomo thinning and dead-and-down permits, local residents will have a straightforward legal path to the wood they need, and much of the incentive for illegal cutting disappears on its own. In short, robust, convenient fuelwood access is not just a benefit to local families [mdash] it is a practical wildfire-prevention and forest-protection tool in its own right, since wood that is properly and legally harvested is wood that does not end up as an illegal cutting scar somewhere else on the forest.

I would ask that the Forest Service treat fuelwood availability as a metric of the project's success, not simply a permitted activity that happens to occur alongside the "real" work of restoration. This could mean clear, advance public notice of when and where fuelwood will be available as treatments are phased in, priority scheduling of

fuelwood collection windows before other commercial removal in a given unit, and continued support for the temporary-road-to-fuelwood-access provisions already described in the EA. Given how directly this project intersects with the basic winter heating needs of local communities, I believe getting fuelwood access right is just as important to the project's long-term success and public support as getting the ecological treatments right.

Concern: Roads Must Actually Be Closed After Work Is Finished

I do want to raise one significant concern. The EA describes a large amount of road work needed to carry out this project [mdash] reopening old logging roads, building new temporary roads, and putting many miles of road into storage or scheduling them for decommissioning once treatments are complete. I support this access being made available for the life of the project, since it is clearly necessary to get equipment and crews into treatment areas. However, I am concerned about what happens after the work is done.

Experience on this forest and elsewhere shows that roads which are supposed to be temporary or placed in storage often do not stay closed in practice. Once a route has been reopened and used, it becomes easier for people to find and use it again with off-highway vehicles (OHVs), even after gates, berms, or other closure devices are installed. The EA itself acknowledges that unauthorized motorized use of closed and non-system roads is already a problem in this landscape, and that poorly closed roads contribute to erosion, habitat fragmentation, and degraded water quality. Reopening well over 100 miles of currently closed roads, even temporarily, creates a real risk that this problem gets worse rather than better if closures are not rigorously enforced and properly built to last. I urge the Forest Service to commit to durable, well-monitored closure methods [mdash] not just signs or thin gates that can be driven around [mdash] and to follow through on the decommissioning and storage timelines described in the EA rather than allowing "temporary" access to become permanent by default. Effective closure is not a minor detail; it will determine whether this project restores quiet, resilient forest or simply expands the network of illegal OHV routes that already burdens this landscape.

Recreation Should Be Restored and Strengthened, Not Just Protected

Beyond simply avoiding harm to recreation, I would like to see this project actively invest in improving non-motorized recreation once treatment work is finished in a given area. Thinning and prescribed fire will temporarily disrupt trails, trailheads, and dispersed camping areas, and some short-term inconvenience during implementation is a reasonable trade-off for the long-term benefit of a healthier, more fire-resilient forest. But the goal afterward should be a forest that is more inviting to hikers, mountain bikers, and other quiet recreation users than it was before, not less.

I would encourage the Forest Service to treat post-project trail and access restoration as a real commitment, not an afterthought. Where existing hiking and biking trails pass through treatment units, they should be reopened promptly and, where needed, rerouted or rebuilt to a high standard once work is complete. Where old skid trails, temporary roads, or closed routes could be repurposed into new non-motorized trail connections instead of being left to revegetate on their own, the Forest Service should look for those opportunities, since a well-thought-out trail network can help direct foot and bike traffic away from sensitive areas while giving the public more reason to enjoy a restored landscape. A more open forest with better sightlines, healthier trees, and reduced fire risk is also, quite simply, a nicer place to hike and ride than the dense, overgrown stands that exist today, and the Forest Service should make sure the public gets to experience that benefit directly and quickly, rather than waiting years for access to be restored informally. Investing in this kind of recreation restoration will also help build public trust and support for the broader project by giving people a tangible, positive reason to visit these areas again after treatment.

Conclusion

The Truchas-Costilla project is a sound, necessary response to forest conditions that have been declining for

decades. The no-action alternative would simply allow the risk of a catastrophic wildfire to keep growing, threatening the communities, water supplies, and traditions that depend on this forest. I urge the Carson National Forest to move forward with the proposed action, to resist pressure to scale it back based on misunderstandings of what a healthy forest actually looks like, to make local fuelwood access a genuine priority rather than an afterthought, to follow through rigorously on road closures so this project does not leave behind a larger illegal OHV network, and to make restoring and improving quiet recreation access a real priority once treatments are complete.

Thank you for your work on this project and for the opportunity to comment.

With Appreciation,

Carl Weinmeister

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