



**File Code:** 1950  
**Date:** June 17, 2024

Dear Interested Party,

The Carson National Forest is seeking comments on the proposed Taos Canyon Forest and Watershed Restoration Project. The project proposal is to reduce fuel loading and restore forest structure, composition, and spatial distribution on approximately 83,000 acres of National Forest lands to maintain watersheds that are resilient to fire and protect adjacent communities. Project objectives include,

- Re-establishing fire-adapted forests, including restoration of natural fire regimes and forest structure, and maintaining a healthy forest condition with managed fire.
- Reducing fuel loadings and the threat of severe wildfire to infrastructure and the adjacent communities of Pot Creek, Talpa, Cañon, Taos Canyon, Shady Brook, Valle Escondido, Taos Pines, Angel Fire, Hidden Lake, and Black Lake.
- Improving wildlife habitat and sustaining both common and uncommon native species.
- Protecting cultural resources that include ancestral Tribal lands and acequia diversions.
- Providing firewood and wood products to local communities.

In 2022, US Department of Agriculture Secretary Vilsack announced a 10-year strategy to confront the nation's growing wildfire crisis – "Confronting the Wildfire Crisis: A Strategy for Protecting Communities and Improving Resilience in America's Forests". This strategy directed the Forest Service to work with partners to focus fuels and forest health treatments more strategically, meaning in areas most capable of generating large wildfire disasters and with the highest probability of fuels reduction success. According to the wildfire crisis strategy, the bulk of community exposure to wildfire originates from a relatively small number of "firesheds" - large, forested landscapes with a high likelihood that an ignition could expose homes, communities, and infrastructure to wildfire. Therefore, by targeting the source of exposure in these specific areas and working with partners and stakeholders to set common goals across shared landscapes, strategic fuels management projects can reduce wildfire impacts not only to homes and communities but also on air quality, municipal watersheds, wildlife habitat, and other values at risk.

To begin implementation of the wildfire crisis strategy the U.S. Forest Service identified 10 priority landscapes in 8 states in which to invest an initial round of Bipartisan Infrastructure Law funding. Among the first 10 priority landscapes identified was the [Enchanted Circle Wildfire Crisis Strategy Landscape](#), an area covering approximately 1,460,000 acres, which includes four high risk firesheds and the majority of the Camino Real Ranger District. The proposed Taos Canyon project falls mainly within the Taos high-risk fireshed which ranks as the 21st highest priority nationally among all firesheds on National Forest System lands. The landscape has also been identified as a high priority for forest restoration and fire risk reduction by the 2020 NM



State Forest Action Plan, the 2022 State of NM Forestry Division Communities at Risk Assessment Plan, the 2021 Taos Canyon Community Wildfire Protection Plan, and the 2022 Colfax County Community Wildfire Protection Plan.

This project would be located on approximately 83,000 acres of National Forest System lands in the Carson National Forest, Camino Real Ranger District. The project area is adjacent to the Pueblo Ridge project, generally to the south of U.S. Highway 64, stretching from the forest boundary to the east to the McGaffey project boundary and NM Highway 518 to the west, as far south as the Cerro Vista ridgeline. A map of the proposed project area is included with this letter. All proposed activities are located on lands managed by the USDA Forest Service.

### **Why is Work Needed?**

A healthy forest is resilient—capable of self-renewal following drought, wildfire, beetle outbreaks, and other forest stresses and disturbances. Fire-adapted forests require frequent low-intensity wildland fire to function effectively by keeping the number of trees and other plants in balance with limited resources such as water. However, past land management practices in northern New Mexico—including fire suppression, grazing, and logging focused on the largest, merchantable pine, fir, and spruce trees—have changed the structure of forested vegetation communities. Stand conditions have become denser than they were historically, with less age diversity, less vigorous trees, and a greater dominance by fewer and more shade-tolerant species.

As a result, many forested landscapes in the area are less resilient to disturbances such as wildland fire or insect and disease outbreaks. The Taos Canyon project area includes ponderosa pine and mixed conifer forests that are unnaturally dense and have missed several cycles of natural fire resulting in fuel accumulation, a shift toward species that are more susceptible to fire, and a resulting uncharacteristic likelihood of high severity fire effects. Increased severe fire risk poses a threat to adjacent communities and infrastructure both from direct fire spread and post-fire impacts and complicates fire management by making suppression more dangerous and difficult while limiting opportunities to allow fire to function in its natural ecological role.

There is a need to safely reintroduce fire into the ecosystem while reducing the risk of wildfire to communities and watersheds in and around the Taos Canyon proposed project area. There is a need to reduce the fuel buildup in frequent-fire forest types that supports fire behavior and effects that would not have historically occurred and to which those ecosystems are not well adapted. There is a need to manage fuels in other areas such as the wildland urban interface to protect homes and other values from wildfire while facilitating effective wildfire response and allowing fire to play a more natural role on the landscape. In the face of climate change, management that reduces well-understood stressors such as fire risk will create ecosystems with better baseline resiliency and more adaptive capacity to function in the face of other, more uncertain stressors. Ecosystems that are less vulnerable build community resilience to climate change by maintaining productivity and ecosystem services that communities rely on and reducing the threat of uncharacteristic wildfire behavior and post-fire effects like erosion and sedimentation.



### What is Being Proposed?

The Forest Service proposes mechanical vegetation and fuel reduction treatments on up to 54,731 acres and prescribed fire treatments on up to 83,265 acres of NFS lands on the CNF. Prescribed fire refers to deliberately burning an area under specified and controlled conditions, constraining the fire within a predetermined area and intensity to promote resource benefits such as maintaining a diversity of plants important for ecosystem health and wildlife habitat or reducing fuel levels. The intent of the proposed mechanical and prescribed fire treatments is to improve forest health by re-establishing natural fire regimes, associated forest structure, and species composition while reducing wildfire threat to communities and infrastructure. Specific treatments would be phased across the project area over the next 10 years or more, as part of the Forest Service's Enchanted Circle Wildfire Crisis Strategy Landscape. Prescribed fire would continue over a longer timeframe, mimicking the natural fire return interval of each vegetation community where feasible and achievable. (Natural fire regimes may not be desirable in some locations due to difficult access, adjacent values at risk like homes, or other considerations.) Treatments would take place where conditions warrant specific actions but are most likely to occur at the following levels in the following locations:

#### Fuels reduction

- Hand or mechanical tree felling on flat slopes (<40%) followed by ground based yarding of material to a log landing. Ground based equipment may include, but is not limited to, feller-bunchers and skidders, harvesters, forwarders, masticators, and excavators.
- Tree felling, mainly by hand, on steep slopes (>40%) followed by cable yarding of material to a log landing.
- Mechanical tree felling followed by removal by forwarding with ground based equipment on moderate to steep slopes (<75%), including but not limited to harvesters and forwarders or feller-bunchers and forwarders.
- Hand thinning of trees followed by piling or lop and scatter. Material may be left for public collection via dead and down permits. In mayordomo-type, communal firewood units large material would be loaded by hand and removed by pickup truck.
- Prescribed fire preparation, including but not limited to pruning of ladder fuels, tree thinning, mastication, chipping, snag mitigation, rearrangement of dead and down fuels, and brush removal.

#### Timber stand improvement to promote tree vigor, pathogen resistance, and stand heterogeneity

- Hand or mechanical tree felling on flat slopes (<40%) followed by ground based yarding of material to a log landing. Ground based equipment may include, but is not limited to, feller-bunchers and skidders, harvesters, forwarders, masticators, and excavators.
- Tree felling, mainly by hand, on steep slopes (>40%) followed by cable yarding of material to a log landing.
- Mechanical tree felling followed by removal by forwarding with ground based equipment on moderate to steep slopes (<75%), including but not limited to harvesters and forwarders or feller-bunchers and forwarders.

- Hand thinning of trees followed by piling or lop and scatter. Material may be left for public collection via dead and down permits. In mayordomo-type communal firewood units, large material would be loaded by hand and removed by pickup truck.

#### Fire control line construction

- Handline construction to connect holding features by removing fuels to expose mineral soil; followed by post-burn rehabilitation to discourage public access and obliterate or stabilize and store firelines when they are no longer needed.
- Mechanical fireline construction to connect holding features by removing fuels to expose mineral soil; including but not limited to drag lines and dozer lines followed by rehabilitation to discourage public access and obliterate or stabilize and store firelines when they are no longer needed.
- Overstory fuel break construction to limit wildfire spread and reinforce potential holding lines. May be accomplished through any of the fuels reduction methods described above.

#### Aspen stand and meadow maintenance

- Removal of encroaching coniferous trees using any of the fuels reduction methods described above

#### Prescribed fire

- Pile burning to remove slash or fuels created by forest thinning
- Jackpot burning to remove surface fuels, focusing on concentrations of vegetative fuels (jackpots) that create pockets of higher fire intensity and a mosaic burn pattern.
- Broadcast burning to apply fire across the broad area of a burn unit, reducing surface fuels such as dead and down material and understory vegetation and creating openings by removing overstory vegetation to mimic a historic mosaic.

#### Post-fire ecosystem management

- Reforestation or replanting of fire-impacted areas through planting, control of competing vegetation or other activities to enhance natural regeneration and restore forest species.
- Removal of hazardous trees to maintain and protect roads, trails, recreation sites, acequia infrastructure, or to allow reforestation and replanting of fire-impacted areas. May be accomplished through any of the fuels reduction methods described above.
- Post-fire removal of dead or dying trees in areas with uncharacteristically high fuel loading due to prior fire exclusion to reduce the rapid accumulation of woody surface fuels. May be accomplished through any of the fuels reduction methods described above.

#### Transportation system management

- No new road miles would be opened to the public.
- Total proposed new road construction or reconstruction across all vegetation communities would be 112.1 miles.
- Most new roads would use existing road grades that would be temporarily reopened and then decommissioned following project completion (95.5 miles).



- Some new roads would re-open existing road grades and then add the road to the Forest Service system following project completion. These roads would not be open to the public and access would be controlled by a gate or similar means. They could either be available for administrative use only or placed in storage to support future management needs and maintained to prevent resource impacts, but not used. (17.7 miles).
- Approximately 46.0 miles of closed maintenance level 1 system roads would be opened for project activities and returned to maintenance level 1 system roads upon project completion. Following project activities these roads would be closed to the public and would not be used administratively but would be maintained at a minimal level to prevent resource impacts.
- 0.5 miles of new road would be constructed and then decommissioned following project completion.
- 45% (51.0 miles) of proposed new and temporary roads would be used to access areas in the wildland urban interface.
- At least 141.4 miles of undetermined non-system roads would be unused and made available for decommissioning.
- Up to 3 miles of road would be obliterated or naturalized, additional miles may be included if additional resources become available.
- 4.9 miles of temporary roads would be converted to motorized trails.
- 5.5 miles of temporary roads would be converted to non-motorized trails.
- Up to 595 acres of landings would be created for log piling and sorting (0.12-0.5 acre per 10 acres).

Specific locations, size, and treatment prescriptions would be determined following detailed analysis that would be undertaken in the early phases of the project, to better understand on-the-ground conditions, future fire behavior, and ecological response based on different treatment options. This will indicate where treatments are most needed in order to return a forest stand to a restored fire regime that can be managed to allow fire to play a more natural role.

### **Why Have I Received this Proposal?**

The Carson NF wants to identify any issues or concerns the public has regarding the proposed Taos Canyon Forest and Watershed Restoration Project. This scoping period provides an early and open process to determine the scope of issues to be addressed, to develop alternative actions, and to provide information for the responsible official to consider. Based on a preliminary assessment, we anticipate conducting an environmental assessment (EA) in order to provide sufficient evidence and analysis for determining significant environment impacts or lack thereof. We intend to request emergency authority for the environmental analysis of the proposed actions. The Secretary of Agriculture, Tom Vilsack, has 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 in 250 identified high-risk firesheds. The Taos Canyon project lies across three of the 250 identified high-risk firesheds. Emergency actions are taken to achieve relief from threats to public health and safety, critical infrastructure, or to mitigate threats to natural resources. Projects proposed under an emergency authority must be approved by the Agency. The reason for requesting this emergency authority on this project 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 infrastructure and water resources. The Taos Canyon project would implement the Carson National Forest's land management plan and would be implemented as part of the US Forest Service's wildfire crisis strategy. It is subject to the Forest Service's comment procedures as implemented by subparts A and B of 36 CFR part 218, which require a formal 30-day comment period. Authorized emergency actions are not subject to objection under the administrative review process (16 USC 6592c). This letter announces a designated 30-day scoping period, beginning on June 17, 2024. Scoping comments will be most useful if received by July 17, 2024.

### **How Do I Submit Comments?**

Written comments must be submitted to: James Duran, Carson Forest Supervisor. Please include "Taos Canyon Restoration Project" in the subject line of the email or letter. Please indicate if you would no longer like to receive correspondence from the Carson National Forest or if you would prefer to receive future correspondence electronically.

Comments may be submitted by USPS to:

James Duran, Carson Forest Supervisor  
208 Cruz Alta Rd.  
Taos, NM 87571

by email: in Adobe (.pdf), MS-Word (.doc or .docx), rich text format (.rtf), text (.txt), or hypertext markup language (.html) to: [comments-southwestern-carson-caminoreal@usda.gov](mailto:comments-southwestern-carson-caminoreal@usda.gov)

by hand: deliver on Monday, Wednesday, or Friday between 10:00 am and 2:00 pm to the Carson National Forest Supervisor's Office at 208 Cruz Alta Rd., Taos, NM 87571 or weekdays from 8:00 am to 3:30 pm to the Camino Real Ranger District Office at 15160 State Route 75, Peñasco, NM

in person: at a public open house Wednesday, June 26th or Wednesday, July 10th from 12:00-2:00 at the Carson National Forest Supervisor's Office at 208 Cruz Alta Rd., Taos, NM 87571  
Comments received in response to this solicitation, including name and addresses of those who comment, will be considered part of the public record on this proposed action and will be available for public inspection. Comments submitted anonymously will be accepted and considered; however, those who submit anonymous comments will not receive subsequent project information.

Additionally, any person may request that the agency withhold a submission from the public record by showing how the Freedom of Information Act (FOIA) permits such confidentiality. Persons requesting such confidentiality should be aware that, under the FOIA, confidentiality may be granted in only very limited circumstances, such as to protect trade secrets. The Forest Service will inform the requester of the agency's decision regarding the request for confidentiality, and where the request is denied; the agency will return the submission and notify the requester that the comments may be resubmitted with or without name and address within 10 days.

**Questions?**

**If you have questions about the project please contact,  
Peter Rich, Enchanted Circle NEPA planner  
Carson National Forest**

[peter.rich@usda.gov](mailto:peter.rich@usda.gov)

**(575) 758-6277**

Sincerely,



JAMES D. DURAN  
Forest Supervisor