USDA United States Department of Agriculture
Forest Service
Southwestern Region 3
Carson National Forest
208 Cruz Alta Road
Taos, NM 87571
575-758-6200
TDD: 575-758-6329
Fax: 575-758-6213

File Code: 1500, 5140
Date: October 29, 2026

Gallina Canyon Road Association
Attn: Commissioners

Dear Community Members:

Thank you for sharing your concerns about the Lobo Cut-Skid-Deck (CSD) Project and its potential effects on wildfire risk, smoke, and the surrounding communities. I recognize that visible slash piles and the prospect of prescribed burning can cause understandable concern. The Carson National Forest takes those concerns seriously, and I appreciate the opportunity to explain why the treatments are being implemented, how they are intended to improve forest conditions, and the safeguards that guide the remaining work.

The Taos County Community Wildfire Protection Plan (CWPP) is a living document that was first established in 2009 by a dedicated core team. This document has served as the foundational document for wildfire risk reduction and forest restoration work throughout Taos County at a multi-jurisdictional level. The 2016 CWPP Update, “Connecting Communities and Watersheds,” emphasizes the protection of life, property, and critical infrastructure in the vulnerable wildland urban interface (WUI) communities. The 2022 CWPP Update, “Resilient Forests, Resilient Communities,” strengthens the CWPP framework and is based on accepting wildfire and embracing fire-adapted practices at community and landscape levels to improve collective resilience into the future. The most recent 2022 plan update has continued to prioritize thinning and burning activities adjacent to and within communities with medium to high-risk ratings resulting from Communities at Risk (CAR) evaluations. Examples of medium to highly rated communities include San Cristobal, Turley Mill, and Gallina Canyon.

Similarly, the Gallina Canyon/San Cristobal CWPP effort was initiated in 2020 and a plan that aligns with the 2022 Taos County CWPP was completed in June 2021. The New Mexico Association of Counties provided grant funding to the Asociación de Vecinos de San Cristobal for plan development and included participation from local residents, greater Gallina Canyon, Turley Mill and San Crisobal Firewise committees, the Cerro Negro Forest Council, local government/agency staff from Taos County, Taos Soil and Water Conservation District, nonprofits such as the Nature Conservancy and Rocky Mountain Youth Corps, and federal land managers from the Carson National Forest and Bureau of Land Management. Communities at Risk (CAR) ratings were also assigned to communities and thinning and burning activities were prioritized, including Gallina Canyon and D.H. Lawrence Ranch.

The Lobo project is more than a slash-disposal effort. It is intended to reduce hazardous fuels and improve the long-term health and resilience of dense forest stands. In pinyon pine and ponderosa pine, thinning prescriptions address high and very high stand densities that heighten

competition for limited water, light, and nutrients and can make trees more susceptible to pinyon ips and other bark beetles, particularly during drought. Stand Density Index (SDI) is one measure used to assess competition and guide desired residual stand densities. Reducing excessive density gives retained trees greater access to resources, can improve vigor, and helps reduce conditions that favor stress-related mortality. Where the prescription calls for removal of infected trees, thinning can also reduce dwarf mistletoe infection sources, creating better opportunities for healthier natural regeneration and future stand development. These benefits develop over time and depend on site conditions and implementation.

The Lobo treatments are part of the broader Kiowa–San Cristobal (KSC) Wildland Urban Interface Project, analyzed in 2017. The Forest has used several complementary implementation tools across that larger area, rather than a single treatment method on every acre. Our choices reflect ecological objectives, the quantity of material to be treated, access for wood removal, the scale of operations, public and firefighter safety, and the ability to administer treatment requirements. The following responds to the four issues raised in your October 6 petition.

The KSC effort grew out of long-standing local concern about wildfire and watershed protection. The 1996 Hondo Fire burned more than 10,000 acres in approximately 36 hours, destroyed 33 structures, and affected the water supply in Lama for years. The proposed project was discussed publicly in Arroyo Seco in December 2014. In 2015, the Taos Valley Watershed Coalition supported restoring ponderosa pine and dry mixed-conifer forests to help protect community and acequia water resources, and the Forest held a public open house in San Cristobal. A 2016 wildfire-risk assessment helped identify strategic locations for fuel treatments. Following environmental review, the Forest issued the KSC Decision Notice in December 2017.

Implementation has occurred through successive partnerships, funding sources, and treatment methods. Joint Chiefs funding supported work beginning in 2018 and continuing in 2019; the Cerro Negro Forest Council received funding in 2018 for a Forest Mayordomo proposal covering approximately 300 acres, with work beginning in 2019. In 2020, the Forest and New Mexico Forest Industry Association entered into an agreement to support opportunities for smaller local contractors, and a contractor site review was held that August. This history helps explain why crews and contractors have worked in different locations at different times, even as the treatments contribute to shared landscape-scale objectives.

1. Wildfire hazard, slash piles, and timing of burning

We agree that accumulated fuels, lightning, and the possibility of human-caused ignitions create genuine wildfire concerns. The cut-skid-deck treatment removes material from dense stands, interrupts continuity between trees, and concentrates residual slash into piles for subsequent disposal. Piles are a temporary phase of a multi-step treatment—not the final condition we intend to leave on the landscape. While slash remains in piles, those localized concentrations still carry fire risk, even though thinning has reduced fuel continuity. Their eventual consumption is an important step toward the intended reduction in surface fuels. The sequence of work across KSC can also look like the Forest is moving between units before finishing others; in practice, different crews, agreements, and disposal approaches have been used concurrently across the larger project area.

Freshly cut green slash generally needs time to dry before it can be burned effectively; curing may take a year or more. Subject to suitable conditions, the piles along Gallina Canyon Road are currently planned for burning in 2027. This is a target, not a guarantee: operations can occur only when an approved burn plan, weather, fuel moisture, staffing, public and firefighter safety requirements, and smoke-dispersion conditions are met.

Burn prescriptions are based on site-specific objectives and conditions under the NWCG Standards for Prescribed Fire Planning and Implementation (PMS 484), rather than a universal setback distance. Burning is generally planned after significant moisture or with snow on the ground to limit unwanted fire spread and effects to surrounding soils and vegetation. The anticipated pile-ignition work is approximately five to seven operational days, which may be separated by weather or smoke conditions. Fire personnel will monitor and patrol after ignition, including checks for residual heat; the current plan also anticipates infrared monitoring before declaring the operation complete.

2. Smoke and public health

Smoke, including fine particulate matter (PM2.5), is an important concern, particularly for children, older adults, and people with respiratory or cardiovascular conditions. No prescribed burn is smoke-free, and localized smoke impacts can occur even when all requirements are met. Our objective is to reduce those impacts through careful timing, smoke forecasting, coordination, and operational controls.

The Taos Canyon Forest and Watershed Project Environmental Assessment (pages 83–84) describes monitoring during the 2024 La Jara prescribed fire and compares modeled emissions from prescribed fire and a large wildfire. That analysis reported moderate measured PM2.5 levels during ignition and the following day, without measured levels reaching the unhealthy category for sensitive groups, and substantially higher modeled emissions for the large-wildfire scenario. These findings provide relevant context, but they are not a prediction of smoke levels from the Lobo piles. Fire size, fuel characteristics, weather, topography, and proximity to receptors all influence exposure.

Lobo pile burning will be conducted under applicable New Mexico smoke-management requirements and authorizations. The Forest will select ignition opportunities with appropriate dispersal conditions and use available measures to reduce impacts to nearby residents. If conditions are unfavorable, burning will not proceed that day.

3. Environmental review and changed conditions

The 2017 Kiowa–San Cristobal Wildland Urban Interface Project Environmental Assessment evaluated mechanical fuels treatments and prescribed burning in areas near San Cristobal, Turley Mill, Deer Mesa, and Valdez (see pages 1, 14, and Figure 2 on page 18). The analysis also acknowledged changing climatic conditions, including the likelihood of declining winter snowpack (page 158). Its prescribed-fire design criterion, Fire-1, calls for burn plans and environmental conditions appropriate to desired forest structure, density, and project objectives (page 20).

Based on the information identified in your petition, we have not identified a change that, by itself, establishes the need for supplemental environmental analysis. The Forest will continue to evaluate new information and actual on-the-ground conditions as implementation proceeds, consistent with applicable requirements. Weather variability reinforces the need for conservative, site-specific burn decisions; it does not remove the need to reduce hazardous fuels and improve stand conditions.

4. Chipping, mastication, and alternative slash disposal

Chipping and mastication can be appropriate in some settings, and we understand why they may appear preferable to burning. However, breaking slash into smaller pieces does not itself remove fuel, unless chips are hauled away, combustible material remains on the site. Thick chip layers may affect understory response and regeneration and, when burned, can cause prolonged heating in localized areas. Machinery can also disturb soil and create pathways for invasive plants. These effects vary by location and treatment design, and they must be weighed against the benefits and costs of alternative methods.

An important distinction is that the Forest has also used smaller, locally administered mayordomo treatments within KSC. In those units, the prescription called for lop-and-scatter treatment and removal of material down to 3 inches in diameter. Because the mayordomo and participating partners could administer and verify that removal requirement, residual slash did not need to be piled. Such projects are much smaller in scale—approximately 100 acres may take around three years—and benefited from practical access across both private and National Forest System lands to collect and remove the wood. Different treatment schedules and methods are therefore not evidence that one area was abandoned to begin another; they reflect different tools being used to accomplish the larger project's objectives.

A current example is the mayordomo project west of Lobo, begun around 2023 and now sponsored by the Arroyo Hondo de Arriba Land Grant through a Good Neighbor Authority agreement. Leñeros are recruited and assigned blocks, with up to one year to complete their work. That project has followed a comparable lop-and-scatter prescription requiring removal of material down to 3 inches in diameter and is anticipated to conclude in 2026. Where appropriate and authorized, these areas may later receive broadcast or jackpot burning to help maintain desired conditions.

The scale and accessibility of the Lobo cut-skid-deck work differ from those smaller mayordomo areas. Larger contracts and less accessible terrain do not consistently allow removal of all material down to a 3-inch diameter; piling and burning remaining slash is therefore part of the prescribed treatment sequence. Hauling chipped material away would likewise require additional equipment, handling, and expense. The mycelium-based decomposition approach described in the petition was not evaluated in the 2017 project analysis and would require additional review before it could replace an approved treatment. The Forest intends to complete the Lobo pile-burning phase when conditions permit rather than leave the existing piles indefinitely.

I recognize the concern created by the time between thinning and pile disposal, especially for neighbors who see unfinished piles while work continues elsewhere. Since the KSC project was

first discussed with communities in 2014, the Forest has worked with community organizations, local contractors, and other partners to prioritize treatments across a larger landscape. Different funding sources, treatment methods, and production schedules have helped advance that work, but they also create different follow-up needs. Our responsibility is to complete the remaining work safely, communicate the intended sequence clearly, and consider the effects on nearby communities when planning prescribed fire.

Thank you again for your engagement and stewardship of the Carson National Forest. If you would like to meet and discuss the planned prescribed burn for the piles please contact Jack Lewis, Deputy Forest Supervisor at jack.lewis2@usda.gov.

We want to also encourage your continued participation within the larger Taos Valley Watershed Coalition's community-based work, as these local partnerships will continue to guide our active management activity at an increased pace and scale across the Carson National Forest in areas that bring high value treatment to the areas surrounding Gallina Canyon. We remain committed to the ongoing collaborative efforts underway to improve forest health conditions and reduce wildfire risk to community values across the landscape we all call home in this area of New Mexico.

Sincerely,

JAMES DURAN

Digitally signed by JAMES DURAN
Date: 2026.10.30 11:18:28 -06'00'

JAMES D. DURAN
Forest Supervisor

CC: EMNRD – Forestry Division, Taos County Commission, Amy Simms