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March 19, 2015

Ms. Elaine B. Kohrman
Forest Supervisor
Cibola National Forest
2113 Osuna Road, NE
Albuquerque, NM 871113-1001

RE: NOI to revise the 1985 Cibola Forest Plan
File Code 1920 (NMED EIR 5262)

Ms. Kohrman:

Your letter regarding the above named project was received by the New Mexico Environment Department (NMED) and was sent to various bureaus for review and comment. Comments were provided by the Air Quality, Ground Water Quality, and Surface Water Quality Bureaus, and are as follows.

Air Quality Bureau
The Air Quality Bureau (AQB) has reviewed the information provided in a scoping letter from the Cibola National Forest, regarding the proposed revision to the Land and Resource Management Plan and provides the following comment.

The proposed Needs for Change and Proposed Action encompasses several counties within the jurisdiction of the Air Quality Bureau, please be advised that the AQB does not have jurisdiction over Bernalillo County or any Tribal lands within the State. The counties that are included within the plan as proposed are all considered to be in attainment with the National and New Mexico Ambient Air Quality Standards.

The plan revisions as proposed includes the use of prescribed fires and should have no long-term significant impacts to ambient air quality in New Mexico. The AQB administers the Smoke Management Program (SMP), partnering with burners statewide to assure that fire remains a viable tool to achieve land management objectives while protecting New Mexico's air quality. The purpose of the SMP is to provide a clear and equitable regulatory basis for smoke management in New Mexico. Any government or nongovernment entity proposing to conduct prescribed fire activities within the jurisdiction of the AQB are subject to 20.2.65 NMAC SMOKE MANAGEMENT.

Coordination with the SMP with respect to any planned or unplanned burning activities within the management area will ensure the desired conditions and objectives for air quality will be met, along with any issues associated with air quality monitoring.

To further ensure air quality standards are met, applicable local or county regulations requiring noise and/or dust control must be followed; if none are in effect, controlling construction-related air quality impacts during projects should be considered to reduce the impact of fugitive dust and/or noise on community members.

Potential exists for temporary increases in dust and emissions from earthmoving, construction equipment and other vehicles; however the increases should not result in non-attainment of air quality standards. Dust control measures should be taken to minimize the release of particulates due to vehicular traffic and construction. Areas disturbed by the construction activities, within and adjacent to the project area should be reclaimed to avoid long-term problems with erosion and fugitive dust

Any asphalt, concrete, quarrying, crushing, and screening facilities that may be contracted in conjunction with any proposed projects in the plan must have current and proper air quality permits. For more information on air quality permitting and modeling requirements, please refer to 20.2.72 NMAC.

Ground Water Quality Bureau
Ground Water Quality Bureau (GWQB) staff has reviewed the information provided in a scoping letter from the Cibola National Forest, regarding the proposed revision to the Land and Resource Management Plan and provides the following comment.

The project is not expected to have any adverse impacts on ground water quality in the areas of potential effect. A copy of the Water Quality Control Commission Regulations, 20.6.2 NMAC, is available at http://www.nmcpr.state.nm.us/nmac/parts/title20/20.006.0002.htm.

Surface Water Quality Bureau
The Watershed Protection Section (WPS) of the Surface Water Quality Bureau has reviewed the information provided in a scoping letter from the Cibola National Forest (the Forest), regarding the proposed revision to the Land and Resource Management Plan (the Forest Plan) and provides the following comment.

SUMMARY OF PROPOSED ACTION

The Forest proposes to develop an Environmental Impact Statement (EIS) prior to revising its existing Land and Resource Management Plan published in 1985. To develop the EIS, the Forest plans to rely on a *Needs for Change* report summarizing public comments solicited by the Forest between 2012 and 2014. The public responded to questions regarding what should be changed in the proposed Forest Plan revision as compared to the 1985 Forest Plan. Additionally, The Forest will rely on a two-volume *Assessment Report of Ecological/Social/Economic Conditions, Trends, and Risks to*

Sustainability (2014) written by Forest staff. Finally, to develop the EIS, the Forest will rely on comments regarding the above documents such as the comment contained herein.

RELEVANCE TO SURFACE WATER RESOURCES

The Watershed Condition Framework

The Watershed Condition Framework (WCF) is a USFS-wide policy that defines how national forest staff will assess, prioritize, and protect watersheds. WPS anticipates that the Forest will include the WCF in the proposed Forest Plan revision as a central approach to watershed classification, prioritization, and management.

WCF targets the implementation of integrated suites of activities in those watersheds that have been identified as priorities for restoration. The approach is designed to foster integrated ecosystem-based watershed assessments, target programs of work in watersheds that have been identified for restoration, enhance communication and coordination with external agencies and partners, and improve national-scale reporting and monitoring of program accomplishments. The WCF provides the Forest Service with an outcome-based performance measure for documenting improvement to watershed condition at forest, regional, and national scales.[1]

According to the USFS, the six steps of the WCF are:

> Step A: Classify the condition of all 6th-level watersheds in the national forest by using existing data layers, local knowledge, and professional judgment.
>
> Step B: Prioritize watersheds for restoration: establish a small set of priority watersheds for targeted improvement equivalent to a 5-year program of work.
>
> Step C: Develop Watershed Restoration Action Plans that identify comprehensive project-level improvement activities.
>
> Step D: Implement integrated suites of projects in priority watersheds.
>
> Step E: Track restoration accomplishments for performance accountability.
>
> Step F: Verify accomplishment of project activities and monitor improvement of watershed and stream conditions.

The fundamental differences between WCF and the former watershed management paradigm used in the 1985 Cibola Forest Plan are summarized in Table 1 below:

[1] USDA Forest Service: Watershed Condition Framework, FS-977 (2011).

Table 1. *Characteristics of WCF compared with the 1985 Forest Plan paradigm for restoring aquatic and riparian-dependent resources (adapted from Heller 2004).*

WCF	**1985 Cibola Forest Plan**
The "best" watersheds are treated first. Highest priority treatments remove risk factors that may threaten the integrity of the watershed.	The "worst" watersheds are treated first. Highest priority is to create desired habitat conditions for stream segments/sites in the worst condition.
Efforts focus on a few priority watersheds.	Treatments tend to focus on stream segments or sites. They are scattered over several watersheds.
Watershed analysis precedes project work, identifies key processes, and prioritizes areas and associated treatment approaches that address "causes."	Analysis is generally limited to the project scale and to addressing site-scale conditions. Treatments address "symptoms."
A wide range of treatments are generally integrated at a watershed scale and sequenced based on an overall work plan.	A narrow range of treatments usually focuses on individual sites. They are not integrated at the watershed scale.
Suites of essential projects are completed in a watershed before work emphasis shifts to the next priority watershed.	Highest priority work is completed on individual areas or sites located in a number different watersheds.
Partnerships are an essential part of restoration. Skills and resources are strongly leveraged.	Partnerships are limited in number and scope. Skills and resources are only somewhat leveraged.

The WPS views WCF as an overall valid and efficient approach to watershed management. There are, however, points where the WCF, in implementation, falls short of adequate water quality protection. This comment seeks to highlight those points and provide recommendations for The Forest to consider during development of the proposed Forest Plan revision.

The WCF does not specifically focus on improving water quality to meet state or federal standards. While WCF relies on a number or interrelated characteristics of aquatic ecosystems that may commonly be assessed in a desktop GIS environment, water quality standards attainment is just one among many indicators used. WCF is a holistic approach that may bring water quality levels up *as a consequence* of improving natural resource conditions in a given watershed. WPS recommends that The Forest enhance the *Needs for Change* report by explicitly stating a goal of restoring watersheds to meet applicable water quality standards (possibly among other resource concerns), and not just improve resource conditions in a more general sense. Incorporation of such a goal into the proposed Forest Plan revision would more assuredly lead to water quality protection and improvement. Further, it would bring the WCF into conformity with other federal water quality protection methodologies.

Grazing Impacts Deserve Special Attention

As a general comment, WPS urges the Forest to fully develop management methodologies to control grazing pressure on surface water in the proposed Forest Plan revision. The *Assessment Report of Ecological/Social/Economic Conditions, Trends, and Risks to Sustainability* upon which the Forest will rely to develop the Forest Plan revision contains an excellent summary of watershed conditions and data indicating the source of impacts to water quality in the Cibola National Forest. Grazing pressure is high among those impacts and thus deserves due consideration in the revised Forest Plan.

As stated in the Assessment Report, 95% of the land area of the Cibola National Forest includes grazing allotments.[2] The permits issued for each allotment require a Forest-approved grazing management plan. If the permittee is not managing their cattle per the management plan, The Forest can intervene and require specific management corrections. In the WPS's estimation, management of the permittee via the management plan is underutilized by National Forests generally. As the bellwether forest engaging the forest plan revision process, the Cibola has the opportunity to lead by strengthening grazing management processes and renewing the emphasis on efficient grazing management within the revised Forest Plan. In so doing, a significant impact to water quality can be reduced at low cost to The Forest and the permittees.

In summary, the WPS is pleased to be participating in the Forest Plan revision and looks forward to collaborating with The Forest on this important effort.

If you have any questions please contact me at (505) 222-9552 or by email at thomas.skibitski@state.nm.us

Sincerely,

Thomas Skibitski

Digitally signed by Thomas Skibitski
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Thomas Skibitski

Environmental Impact Review Coordinator
NMED File Number: EIR 5262

Cc: (by email) cibolamtnsplanrevision@fs.fed.us

[2] USDA Forest Service Southwestern Region: Assessment Report of Ecological/Social/Economic Conditions, Trends, and Risks to Sustainability, Cibola National Forest Mountain Ranger Districts Volume I (2015), page 6.