Date: March 28, 2015

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To: Cibola National Forest and National Grassland

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Attention: Elaine B. Kohrman, Forest Supervisor

Re: Cibola National Forest Plan Revision Effort; Notice of Intent, February 3, 2015; File Code 1920

Submission of written comments on the *Needs for Change Statements and the Proposed Acton* by April 3, 2015

My husband and I, along with many members of my family, are residents of Cibola and Bernalillo Counties, New Mexico. I understand the Forest Plan Revision will be the guiding authority and direction that *should describe and result in sustainable management of the Forest’s resources, goods and services for the next 10-15 years.* We wish to submit the following comments for your consideration.

I read over the “Notice of Intent” and various articles posted on the Internet. I was particularly interested in N*eeds for Change and Proposed Actions*, and hoped to learn what was drafted so far (over the past two years). I had heard negative comments and hoped that issues were resolved so that the plan can be fully developed with “…extensive public and employee involvement, along with a science-based assessment of the conditions and trends of the Forest’s ecological, social, and economic resources…” The revised Forest Plan Notice of Intent appears to set forth a very ambitious agenda, which development and implementation will require broad application, coordinated effort and need for funding, support and trust.

Although I do not feel as well-informed as I would like to be (I could not find a draft plan on line nor had opportunity to attend meetings, so I cannot comment on proposed actions drafted to date); nevertheless, I would like to thank you for the opportunity to provide input and respectfully request your consideration of my thoughts, opinions and recommendations:

1. **My first recommendation:** **Make the Summary of public meetings and plan development and/or draft plan clearly available on the Internet, in easy to find and written in understandable language.** I am disappointed not being able to obtain current (2015) information. I found many articles, but none of the go-to sites provided an actual Forest Service Public Meeting Summary of Comments or Draft Plan, that I could review to bring me up-to-date and help me make knowledgeable contributions. (Could not open the site quoted in the Notice).
2. **Secure and ensure a trust relationship.** Generally speaking, **p*eople who live in National Forest and Grasslands areas support and defend responsible use of public and private lands and encourage individual environmental stewardship.*** *We all want what’s best*…but each may have differing opinions, beliefs and priorities. *Of course there will always be those who ignore established “rules,” and ruin it for the majority.* But the kind of **trust relationship** I’m talking about questions: Can the people trust government to develop a plan that provides a fair, equitable and balanced usage; well-planned strategic direction; and a framework for sustainable, coordinated forest management, implementing multi-land-use needs within established laws and provisions and possessions?…and Can government trust the people to support what they help to create? If both answers are “yes,” then it will be the kind of dynamic plan that will stand for the best things we love about America and continue to hold dear! **I think we can all agree that those responsible for developing and implementing such a vigorous, revised plan cannot afford to judge (NOT lean toward or favor*) one group’s interests, needs and passions to be more important than another; but use sound judgement*. Then it will truly be a fair plan that meets ALL needs.**
3. **Secure adequate** **funding.** It is a legitimate question: *“How are these plan revisions going to be funded?”*  Government continues to face financial difficulties and decisions now and in the coming years. Nothing is worse than developing a plan with no way to implement or maintain it! Cibola County Emergency Participants demonstrated a nationally recognized “Best Practice:” E.g., that when all levels of government, departments, agencies and private sector agree to work together, combine resources and share responsibilities, they get funded more readily than they would separately. **I suggest that partners work together. I recommend cooperation and joint working relationships be established to reduce funding costs and help implement and maintain the revised management plan.**
4. **Wilderness Area. I and my family members oppose making any part of Cibola Forest and Grass Lands a Wilderness area. We question why the government, working with groups with their own agendas, is pushing to change designated public lands to Wilderness Areas, under the guise of “preservation for future generations to come.” Good planning and management protects the lands and environment. It has for years. It will continue. Here’s my thoughts:**
5. ***Wilderness Areas are* designed to *keep people out or limit public access*.** Right now we can take our children, grandchildren, families to the forests to teach them about the trees and wildlife; how to fish and hunt; how to protect the land; and how to appreciate what they have…and they will continue to teach their children, and on and on. Our children are Scout Leaders…our grandchildren are Scouts; an example of just one of the many, many groups of people that right now are free to enjoy all the wonders of our public lands. Populations are growing, not shrinking. Government needs to commit to protecting public lands from sale to foreign and corporate holders…and from disappearing all together. Focus on managing public lands for the proper use of the people. We are pleased and thankful when we see trails, bathrooms, and picnic areas open and available for the people! This is evidence of wise use of resources, good land management and integrating urban and rural peoples.
6. ***Limiting public access discriminates against a large population of citizens.***  For example: Not all elderly, Disabled (including wounded Veterans), or *anyone* who have physical challenges can enjoy biking, backpacking, or hiking into wilderness areas; they must be able to walk or drive for the most part. For example: My husband and I are “baby boomer” seniors, two of a large segment of population. My husband is a Veteran and Disabled, no longer able to walk over uneven ground. It’s a relief to have paths, trails, bathrooms, places to picnic and trails and roads to drive Off Highway Vehicles (OHV). We bought a Side-by-Side Polaris and now we can once again enjoy the Forest Lands…at least on the very few roads and trails approved for OHV in New Mexico right now. Government’s focus, rather than barring people from enjoying their land, should be upon improving management to make preservation compatible with land use. We would like to see the plan expand access and trails. (More on this later).
7. **Forest Management Plans should address and preclude such Wilderness designations if everyone is doing their job.** Everyone has a responsibility to make it work!
8. **Besides, “How does “government” intend to manage and fund more and more huge Wilderness lands left to “grow wild,” with budget constraints weighing heavy against natural disaster occurrences such as Draught, Wildfire, Flooding, Water shortages, etc.?”** What we see happing: *“Environmentalist’s limitations” conflicts with Forest mitigation, e.g., prevents forest thinning to save an “endangered species”, resulting in forest overgrowth and ground cover, which causes perfect conditions for Wildfires, costs of fighting wildfires and subsequent recovery efforts. Unmitigated loss of Forest and Grasslands due to Wildfire, lack of ability to mitigate a timely and needed recovery of burned areas and watersheds, and devastating impact to local and state economy, among other things.* More government control (e.g., Wilderness Areas) does not necessarily protect watersheds; good management does. Management, protection, restoration…all decisions and efforts… end up funded on the backs of Tax Payers; which taxes are not under protest-- until Tax Payers lose “just representation” or experience loss of freedoms.
9. **We see the way to the future clearly (at this time in history) has nothing to gain by making Wilderness Areas and closing roads and access** from people, ***enjoying what we have now, while improving and* *maintaining public lands, forests and grasslands well for future generations! Isn’t this the point of the Revision Plan? Groups with special agendas may have reasons for promoting Wilderness Areas, but I say, people can and must think practical and work effectively together to ensure our lands are preserved by responsible use… for generations to come!*** We tend to view Cibola National Forest from the narrow perspective of where we live and work and enjoy recreation. It is important for planners and participants to consider this Forest and Grasslands area encompasses Sandia, Monzanos, Zunis, Mt. Taylor…a broad expanse of area and land uses! It is important to consider how all these lands support the economy, tourism and the needs of a broad spectrum of people, business, industry and quality of life, in addition to personal enjoyment. Such land and people are necessarily, “interdependent.” It is necessary to continue to co-exist in harmony together.
10. **Travel Management Strategies. The focus here should not be upon making more “Wilderness Areas” that limits access, but rather upon adding “travel management strategies” to the plans, reclassifying roads** (as a starting place consider recommendations offered by organizations and advocates such as the Blue Ribbon Coalition (BRC), **and mitigation of non-recreation projects that often obliterate trails, cause soil erosion, impact water quality and ecosystems, and other mitigation deficiencies , managing and improving access to recreational opportunities. Please consider the need to better recognize and potentially enhance the role of the Cibola National Forest in supporting both commodity production and services such as recreation and tourism.** As stated in the Notice, there is a need to integrate sustainable recreation management with that of other Forest resources and to provide guidance for managing a sustainable trails program while addressing use conflicts. There is a need to provide guidance for managing recreation activities that occur in areas sensitive to resource degradation or at risk due to high visitation. There is a need to update direction on managing recreational aviation activities, caves, and activities associated with wildlife, fish and cultural/historic sites. And there is a need to update plan direction and guidance for implementing…scenic resources. Again, the BRC has well-thought-out policies already developed to assist Forest Services in their plan development.

(*BRC Policies and Positions* Internet Article, <http://www.sharetrails.org/about/policies>, 3/25/2015).

1. **Provide trails program management that includes the Continental Divide Trail, recreation activity trails, and scenic resources.**
2. **We concur (with BRC, “New Mexico – Cibola National Forest Extends Forest Plan Revision Wilderness Mapping Phase, Internet http://www.sharetrails.org/node/16077, 3/25/15) the agency should develop travel management strategies and include them in the forest plan revision process, e.g., “ML3 Roads to Trails; ML2 Roads to Trails, Single Track Trails, Wet Weather Closures, and Mitigate Trail Impacts from Non-Recreation Projects.** Additionally, we refer you to a Blue Ribbon Coalition (BRC) Internet Article about “Policies and Positions” (<http://www.sharetrails.org/about/policies>, (3/25/15) that addresses various issues concerning trails program management which I refer to you for your consideration in shaping this dynamic plan. It addresses “Private Lands, Route Designations, Route Design and Diversity, Environmental Protection, Overcrowding at trailheads and access points, Backcountry Designation, Signing, User Fees, Vehicle Sound, use of Alcohol and Drugs, Unlawful Activities, Safety, Science, Shared Use, Vehicle Emissions, Hunting and OHV use, Law Enforcement, Irresponsible Advertising, and Volunteerism,”… all of which we believe integrates values of preservation and protection along with opening up trails to accommodate OHV and other recreational use.
3. **Historically, the State of New Mexico, is dependent upon soft industry, such as Tourism, to bring monies into the State. Local and Tribal jurisdictions also benefit from the many travelers passing through their areas. It is time that New Mexico realize value and economic boost of developing and promoting OHV and other recreation activities within the scope of a trails management program that includes the Continental Divide Trail, recreation activity trails, and scenic resources.** **This is the time to act—not wait until 10 or 15 years down the road, when opportunity has changed!**
4. **Transmission and Communication Corridors (including towers for communications sites) should remain top priority.** After “9-11,” the vulnerability of America was exposed. To fix the gapping problem of securing infrastructure and U.S. security, Government realigned and for years after, the priority leading the Nation became “Homeland Security.” The effort promoted joint jurisdiction planning, response and resources to ensure communities could respond to emergencies and ultimately become more sustainable; and to provide a deeper level of protection of lives, property and the environment from disasters and threats of terrorism. At the same time, it was noted that energy needs/changes were necessary…not just from the aspect of reducing fuels emissions in the face of global warming, but also to ensure a safe and secure nation, that is infrastructure-connected to continuous availability of power and communication (both have the potential of crippling America). **When measured against things we would like to have, as opposed to things we must have…the solution is simple. Considerable investments were made in improving both systems, Transmission and Communication. It should remain a top priority to protect their corridors, access and maintain them because they are vital to safety, welfare and protection of people and property.**
5. **Timber Sale Quality and Livestock.** I am not totally sure what is meant by “timber sale quality,” except the need to provide direction for management and removal of miscellaneous forest products for commercial, noncommercial, tribal and/or land grant use. I am hoping this includes encouraging residents to remove miscellaneous forest products for home heating fuels. I do know what it means to live in the economically depressed area of Cibola County. I do know people can use ground cover and dead/damaged trees for fuel to heat their homes in the winter**.**
6. **It seems a logical solution to allow people to participate in a thinning and cleanup program. Such removal of fire fuels benefits both the land and the people. Overtime we are getting smarter about what hurts or helps our situation.** Another example of wise and beneficial mitigation (eliminate noxious weeds/plants/damaging overgrowth) is the removal of Salt Cedar (program) in our area.
7. **Livestock grazing is also an important consideration for Ranchers and Public Land Manager entities to work together for the good of both. It is critical to develop and maintain such co-existing land use (especially in the face of continuing draught and disaster prevention) to consider and mitigate water shortages, noxious plants, overgrazing and any other threat to human life, livestock and/or wildlife and the environment.**
8. **Since adoption of the Community Wildfire Prevention Plan (CWPP) Wildland Urban Interface (WUI) adopted in Cibola County in 2006, funded programs are available and actively working within Cibola County to reduce fuels and many other programs that address the Intents of the Revised Plan.**  **I recommend Forest Service continue to work together with community and all entities sharing the same concerns and mitigation goals.**
9. **Cultural and historic resources that address historic properties and landscapes, sacred sites, contemporary uses and tribal cultural needs, along with areas of Tribal importance and other resource management objectives…should be considered equally along with needs of all people and entities. It is with great respect for one another that we seek agreements and minimize any such differences of opinions that would threaten to hinder development of a sound and viable management plan. Although Tribal, land grant, special interest groups’ needs should be recognized, so should the same spiritual, cultural, human and resource needs of all communities, jurisdictions, entities and people be *equally considered*. It requires sensitivity to the task of finding the bridge to solutions that will work for everyone. Here within this consideration, “government” is obligated to consider the many sides, not just one side or a few. To do this, issues should be evaluated and negotiated to arrive at the best solutions for all parties concerned. We all value the same lands for the same reasons.** No longer can a line be drawn between peoples or boundaries for services, accesses, resources or enjoyments.We peoples are all living and working together; intermixed and integrated; actually dependent upon one another--which makes even more sense to agree, to share resources, and to work together for the common good. If agreed-upon “spiritual, cultural or historical sites” should be specifically identified, then the next step is to agree how *each site* should be appropriately *managed,* with justice for all and within existing laws and legalities.

In closing, My husband, my family and I…all the folks we know…feel strongly that the needs addressed in this revised plan are critical to support current and projected future economic, recreational, and multi-use “needs and possible actions” over the life of this plan and for achieving a prosperous and vigorous vision for the future.

We appreciate that forests and grasslands across America are part of America’s National Treasure. They are our heritage and our legacy. They belong to America and to each of us. It is our (joint) responsibility as Americans--the young and old, all races, creeds and religious beliefs—ALL. All are responsible to not only ensure our beautiful lands are protected and maintained, but also to guarantee the right of all the people to enjoy their heritage NOW as well as in the future…including how we can best accommodate “needs” and develop action plans. (We thank you for all the improvements we’ve seen and enjoyed over the years! We just feel bad that our water sources are drying up due to the draught.)

We sincerely thank you for your hard work and dedication to meld all submitted considerations into a revised management plan that will balance the will of the people with the preservation and wise management of our Natural Resources.

Respectfully yours,

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Peggy J. Jordan Robert Jordan III

Retired Cibola County Emergency Manager Retired Navy Veteran/Law Enforcement Officer

(On behalf of, and including, Family Members who utilize the Cibola National Forest and Grasslands areas)