



Cibola National Forest
2113 Osuna Road NW
Albuquerque, NM 87113

April 2, 2015

Submitted via email to comments-southwestern-cibola@fs.fed.us

To Whom It May Concern:

Please accept these comments on the Notice of Intent to revise the Cibola National Forest Plan, in addition to those submitted by The Wilderness Society, to which we are a signatory.

The New Mexico Wilderness Alliance is a nonprofit organization dedicated to the protection, restoration, and continued enjoyment of New Mexico's wildlands and wilderness areas, with thousands of members across the state. In addition to our work on public lands in New Mexico, we have also been involved with the reintroduction of Mexican Gray wolves into the Gila region since our inception in 1997.

In order to comply with the substantive requirements in the new forest planning rule, the Cibola National Forest (Cibola) must establish species-specific plan components in the forest plan, including standards or guidelines that will "contribute to the recovery of federally listed threatened and endangered species." Each alternative must "[i]nclude plan components, including standards or guidelines, to maintain or restore ecological conditions within the plan area to contribute to maintaining a viable population of the species within its range."

Additionally, the Cibola acknowledged in its Needs for Change statement (Section III (E), page 14) that, "[t]here is a need to develop plan components to contribute to the recovery and conservation of federally recognized species..."

While Mexican Gray wolves in New Mexico remain an experimental, non-essential species under section 10(j) of the Endangered Species Act (ESA) in the recently published Final Revised Experimental Population Rule¹, the Fish and Wildlife Service (FWS) also designated them a separate subspecies and greatly expanded their recovery area. This newly expanded recovery area includes the vast majority of the Cibola National Forest, and any wolves dispersing into it would be allowed to remain there under that Rule's protections.

¹ Available at http://www.fws.gov/southwest/es/mexicanwolf/pdf/Mx_wolf_10j_final_rule_to_OFR.pdf (January 2015).

Over the past few years, there have been rumored sightings of Mexican wolves in the San Mateo Mountains, which is outside the existing recovery area but inside the revised expanded one. All of the Cibola is squarely within the wolves' historic range and many areas present outstanding opportunities for wolf expansion if they are given the chance. The Cibola's proximity to the Gila, particularly to the San Mateo mountain range, means that the Cibola will likely be one of the first places wolves will re-inhabit once the new FWS Rule takes effect.

FWS's scientific panel on Mexican wolves (Mexican Wolf Recovery Team's Science and Planning Subgroup) determined in 2011 that the best available science indicated that a healthy, sustainable wolf population would be comprised of approximately 750 wolves, made up of three populations of at least 200 wolves each². There are currently 109 Mexican wolves in New Mexico and Arizona combined.

As you know, the US Supreme Court held in *TVA v. Hill* 437 U.S. 153 (1978) that the Endangered Species Act is the highest priority for all federal agencies, and Forest Service guidance, as well as NEPA, requires the agency to use the best science available when making its decisions³. The Cibola's existing plan is from 1985, fourteen years before Mexican wolf reintroduction, and obviously did not consider wolves.

For all of the above reasons, we believe the Cibola must consider wolves and their probable dispersal from the Gila in the Forest Plan Revision. This is particularly prudent since the wolf population will likely expand in the twenty years during which the plan will be in effect. USFS should take the SPS recommendations into account, and develop a plan that will best implement the federal responsibility to conserve endangered species.

The Cibola should analyze which areas are most likely to see wolves in the near future, and consider best management practices regarding various resources to ensure that wolves can thrive. Specifically, the plan should analyze grazing impacts on wolves and how wolf-cattle interactions can generally be minimized, including how ranchers can be more responsible for removing or otherwise disposing of carcasses within the forest so as not to attract wolves, and avoidance of portions of allotments which overlap den sites while pups are present.

Thank you for the opportunity to comment, and we look forward to participating in the future steps of this process.

Sincerely,

Judy Calman

² See USFWS 2011:49; Carroll et al. 2006: 25-37; 2014:3

³ See Forest Service Handbook 1909.12, 42.1 (2013), see also National Environmental Policy Act 40 C.F.R. § 1500.1(b); See also Executive Order 13563 (2011), affirming Executive Order 12866 (1993); See also Endangered Species Act 16 U.S.C. 1533 (b)(1)(A).

Staff Attorney
New Mexico Wilderness Alliance
142 Truman St. NE #B-1
Albuquerque, NM 87108
505-843-8696
judy@nmwild.org