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Ms. Elaine Kohrman

Forest Supervisor

Cibola National Forest and National Grasslands

2113 Osuna Road NE

Albuquerque, New Mexico 87113

RE: Comments on Cibola National Forest’s Assessment Reports Phase of the Forest Plan Revision Process

Dear Ms. Kohrman:

Please accept the following comments from the New Mexico Wildlife Federation (NMWF) on Cibola National Forest’s Assessment phase of the plan revision process. We will offer our review and recommendations for how we might approach solutions to problem areas identified in the key risk assessment findings the Cibola National Forest (CNF) has identified.

After 100 years, the NMWF remains true to its roots: Sportsmen working to protect New Mexico’s wildlife, habitat and outdoor way of life. Practical, solution-oriented and successful, we rely on science and the North American Model of Wildlife Management as our guides. We have found common ground with landowners and management agencies to produce results that benefit sportsmen and wildlife. We are constantly working on access, habitat and opportunity for New Mexico’s sportsmen and women on our treasured public lands.

**General Comments**

The CNF is one of the premier public land hunting areas in the West, and the NMWF takes a strong interest in the CNF Plan Revision. Named by *Field & Stream* as one of the 10 best public lands (#4) in the country, CNF offers excellent hunting opportunity for Coues deer, mule deer, elk, antelope, black bear, javelina, mountain lion and turkey. Part of what makes the CNF such a high quality hunting destination is its large tracts of uninterrupted backcountry habitat, along with excellent public access. The CNF invokes a sense of remoteness and the opportunity for bird hunters to pursue three species of quail (Montezuma, scale and gambel), morning doves, band-tailed pigeons and turkeys. The area also provides important summer, wintering and calving habitat for elk.

Hunting in New Mexico provides important economic revenue, which is in no small part fueled by quality public access and habitat in areas such as the CNF. To sustain the hunting industry, we need to maintain the wildlife populations upon which it depends. Maintaining large tracts of quality intact habitat provides an assurance that wildlife populations will remain healthy, along with the hunting economy.

As confirmed by a 2004 report by The Nature Conservancy (Vander Lee, Bruce, et al., Chapter 10: “Ecological and Biological Diversity of the Cibola National Forest Mountain Districts in Ecological and Biological Diversity of National Forests in Region 3”), plant and animal communities in the region are diverse, ranging from semi-desert grassland to pinion-juniper, ponderosa pine, Douglas fir, spruce and aspen. CNF’s San Mateo Mountains are the northern reach of the Mexican Madrean Encinal Woodland system with associated species such as red face warbler and painted red start. The area also contains critical habitat for the Mexican spotted owl. This largely roadless area is ecologically linked with the Gila National Forest and the Aldo Leopold Wilderness Area to the south and the Mogollon Rim to the west, allowing species and genetic diversity to move along the Rocky Mountain Corridor.

The NMWF offers the following balanced approach to maintain the area’s high quality backcountry habitat, and the hunting access that the CNF offers, while still allowing land managers the flexibility to conduct habitat improvement projects.

**Ecological Changes**

The CNF is experiencing some challenging degradation issues and natural environmental changes to its landscapes. There are assortments of management considerations that can be addressed to improve the resilience of the CNF’s ecological landscape.

* *Evaluating the forest’s vulnerability.* As a proactive step in addressing the identified ecological and socio-economic changes referred to in CNF’s *Preliminary Need for Changing Management Direction of Its Existing Forest Plan*, CNF prepares a vulnerability assessment that analyzes key species, such as mule deer, and habitat susceptible to emerging ecological threats and changes. Once a vulnerability assessment analyzes these threats, CNF creates specific objectives that identify and provide information which may more effectively guide forest management for the CNF.
* *Identifying the major threats and developing objectives that specifically target these threats.* The CNF has correctly recognized several threats in their key findings with potential suggested solutions. However, with the onset of drier climates and drought conditions, NMWF believes actions that help decrease the CNF’s vulnerability from the impacts of climate change will aid in its ability to adapt and manage for all the changes that could occur as a result of a warmer climate.
* *Managing the CNF as a connected landscape.* NMWF recognizes that watersheds and landscapes do not end at the forest boundary, nor do the effects from pollution, overgrazing (by domestic and wild animals), invasive species encroachment and climate change, to name a few. Recognizing the importance of its neighboring boundaries that include other federal and state landscapes and private lands, the ecological integrity of the CNF can improve. This will involve collaborative efforts, creating new relationships and strengthening existing ones.
* *Managing the CNF in concert with the BLM.* Where the CNF is directly adjacent to BLM lands that are managed for conservation purposes, the CNF should ensure that it is managed consistently with the BLM. Doing so will ensure consistent management of wildlife habitat.

**Watersheds**

The NMWF is in agreement with the following desired conditions found in CNF’s report, *Draft* *Forest-wide Ecological and Socioeconomic Desired Conditions* (CNF Report)*,* regarding Watersheds:

* New Mexico water quality standards should continue to be met in the CNF.
* Maintain water resources, including water quality, by ensuring Best Management Practices as described in the National Best Management Practices for Water Quality Management on National Forest System Lands and in FSH 2509.22 are implemented and monitored.
* Watersheds are functioning properly, in satisfactory condition.
* Watersheds are not at risk due to the fuels composition and uncharacteristic disturbance and that the fire indicator of watershed framework is rated “good.”
* Watersheds mostly contain free-flowing streams and functioning wetlands and riparian areas.
* The hydrologic regime within a watershed is not impacted by the density and distribution of roads, trails, and impervious surfaces.
* Watersheds exhibit high geomorphic, hydrologic and biotic integrity relative to their natural potential condition.
* Springs, riparian areas and wetlands have the necessary soil, water and vegetation attributes to be healthy and functioning.
* Instream flows provide for channel and floodplain maintenance, recharge of riparian aquifers, water quality and minimal temperature fluctuations.
* In aquatic and riparian systems that evolved with wood near the streams, ensure that large woody material is present and continues to be recruited into the system at near natural rates.
* Riparian, wetland and spring dependent resources are supported preferentially.
* Higher ecological values associated with water resource features such as springs, streams, riparian areas and wetlands are supported by the healthy condition of these features.
* Sufficient reproduction of native species appropriate to the site is occurring to ensure sustainability.
* Riparian and wetland plant communities occupy most of area where they might potentially grow.
* The ecological integrity of riparian areas is maintained or restored, including structure, function, composition, connectivity, water quality, sediment, aquatic and terrestrial habitats and floodplain values.

The NMWF would add:

* Critical riparian areas in the CNF are identified and protected for wildlife use only, if adequate water within the allotment is available for livestock operations.

**Grazing**

Grazing of livestock will continue on most of our public lands as specified in federal law and regulations. NMWF supports grazing management in a manner that provides the greatest benefit to habitat and wildlife resources. The BLM produced a document called *NM Standards for Public Land Health and Guidelines for Livestock Grazing Management* which describes in detail what comprises a healthy ecosystem for our public lands on both upland and riparian areas.

* Research at NMSU has shown that the maximum livestock forage use should be 30% – 35% for habitat sustainability for wildlife.
* Under best management practices, it requires all livestock waters on public lands be kept filled and available to wildlife on a year-round basis.
* To keep livestock from water in order to encourage grazing rotation, exclosures must be built and water cannot be turned off.
* If freezing is a problem, then the water may be turned off, but water must be supplied by tanks.
* All water must have wildlife escape ramps.
* If allotment holders are willing to sell their rights to an NGO for permanent resting from livestock grazing, the CNF should support and facilitate such actions as long as all other public uses continue, exclusive of development.
* Forest and grassland restoration projects that are successful mean that there will be increased grass forage available. Increases in available forage are reserved for watershed function and wildlife. After treatment, there should be no increase in grazing or allotment numbers to deplete the results.

The NMWF supports the following points from the CNF Report regarding Range and Grazing:

* Proper livestock stocking rates and associated management activities contribute to healthy, diverse plant communities, soil stability and wildlife habitat.
* Livestock grazing and associated management activities are in balance with the needs of wildlife forage, watershed ground cover, natural fire regime and resilience to climate variability.

**Roads & Motorized Recreation**

The NMWF supports the following points from the CNF Report with regard to Roads:

* National Forest System (NFS) roads and bridges provide safe and efficient access for recreation opportunities and resource management and are maintained in good condition to prevent resource damage.
* The maintenance program for the CNF road system is financially sustainable.
* Undesirable impacts to water resources, soils, heritage sites, wildlife and vegetation from CNF system roads are adequately mitigated.
* Open NFS roads are well marked through the proper use of signage, making them easy to locate for all users.
* NFS roads intended for use by high clearance vehicles are clearly distinguished from those intended for standard passenger cars, through proper use of road entrance treatments and/or signage.
* NFS roads decommissioned per a travel management decision are either converted to other uses in a timely manner, or treated in an effective way to eliminate motor vehicle traffic use.
* Education is effective, in partnership with local users, in informing the public of open areas and roads. Open NFS roads not presently needed are closed (all motor vehicle traffic prohibited) until they are needed again, and road closure methods are effective in eliminating motor vehicle traffic.
* Unauthorized roads that are causing environmental impacts are rehabilitated in a timely manner.

The NMWF would add:

* Roads not designated for public motorized use in the travel planning process and that are not needed for future use are decommissioned or converted to other uses in a timely manner.
* Studies have shown that spacing of route densities greatly impacts elk and mule deer movement. The CNF consider no less than two-mile spacing for motorized route density in critical elk and mule deer habitat.

The NMWF supports the following points from the CNF Report with regard to Motorized Recreation:

* Opportunities for off-highway vehicle (OHV) riding, driving for pleasure, motorized dispersed camping and motorized big game retrieval are provided on the designated system of NFS roads and motorized trails in accordance with the motor vehicle use maps (MVUMs). Visitors understand and comply with the designations shown on the MVUMs.
* The designation of NFS roads and trails and areas on NFS lands for motor vehicle use and over-snow vehicles is consistent with the Travel Management Rule at 36 CFR 212 and with desired recreation settings.

The NMWF would add:

* The CNF strictly enforces existing OHV regulations consistent with the Travel Management Rule at 36 CFR 212 to protect habitat from fragmentation by illegal OHV use.
* The CNF provides ample law enforcement personnel to monitor and manage illegal OHV use and other illegal activities in the CNF.
* In reference to RS 2477, while maintaining access is utmost, where any road crosses critical wildlife habitat or sensitive riparian area, that road should be evaluated for closure.

**Access**

The NMWF supports the following points from the CNF Report with regard to Access:

* Right-of-Ways and Easements provide for broader access to lands within the CNF without impacting private inholding rights-of-way and easements.
* Acquisition of lands facilitates efficient management strategies for the CNF.
* Encroachment issues are resolved equitably for both adjacent landowners and the CNF.

The NMWF would add:

* Access to public lands is provided throughout the planning areas.
* Easements are acquired to provide access to public lands for recreation, including wilderness and roadless areas.
* Priority for the acquisition of easements is placed on former county roads vacated by county governments, when these roads are the only access to areas of high recreation value.
* All available methods are used to obtain legal public or administrative access from willing landowners to cross non-federal land to reach public land lacking adequate access.

**Designated Areas**

The NMWF supports the following points from the CNF Report with regard to Designated Areas:

* Inventoried roadless areas are managed to protect and conserve their roadless character consistent with 2001 Roadless Area Conservation Rule.

**Conclusion**

The NMWF is committed to protecting and restoring the unique wildlife and habitat values of the CNF. We appreciate the opportunity to participate in the forest plan revision process and would like to work cooperatively with the Forest Service on the issues discussed above. We believe in the importance of achieving ecologically sustainable, fiscally realistic and enforceable management of forest resources in the future.



Respectfully submitted,

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