

September 23, 2015

Mr. Champe Green  
Forest Planner  
Cibola National Forest and National Grasslands  
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Dear Mr. Green:

Thank you for the opportunity to comment on Phase 2 of the Cibola National Forest "Potential Wilderness Inventory and Evaluation Process." My comments will focus on the Bear Mountain region in the Magdalena Ranger District.

Regarding the Bears, I was pleased to see that nearly 26,300 acres are identified as potential wilderness in Phase 2. However, important areas now have been excluded and two key areas continue to be left out: the NE corner west of 354 and the area east of 354 but west of the powerline and north of 354O. I find it difficult to justify these decisions based on my own extensive field work:

- May – July, 2014: Survey of roads and developments throughout the Bear Mountain region. Comments based on these results were submitted during the Phase 1 process on 11/19/14.
- September 2015: Survey of fences and other features identified by the Forest Service as "Substantially Noticeable Features" in Phase 2 which resulted in certain areas being excluded from wilderness consideration.

In the attached document, I've provided the highlights of this field work. I have also provided a DVD with my original data by hand delivery to the Cibola National Forest Headquarters on 9/23/15.

Based on the results of my fieldwork, I respectfully disagree with most of the Forest Service's assertions that fences and other features constitute "substantially noticeable features" sufficient to disqualify these lands as wilderness according to the Forest Service's criteria. I also found numerous instances in which the locations of SNFs as provided by the Forest Service are significantly inaccurate sometimes by nearly a mile.

These discrepancies lead me to conclude that the Forest Service did not perform an on-the-ground assessment of all of these features, which begs the question of how this information was obtained. Not only do these inaccuracies impede independent evaluation, they also cast doubt on the credibility of other information provided to the public by the Forest Service.

Sincerely,



Arian Pregenz  
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