

Appendix II: Comments on Specific Wilderness Inventory Polygons

TWS and our conservation partners conducted field inventories the summers of 2012-2014 to identify wilderness quality lands across the forest. Using the Cibola's interactive online mapping tool, we submitted comments based on this field survey. The Forest Service must ensure that all of the comments that were submitted via the online mapping tool are included in the formal administrative record. This appendix includes a subset of the comments that we or our partners submitted using the online tool; we provide comments only for those polygons where we conducted a field survey. Many of these comments were lifted directly from the online mapping tool and so descriptions of "areas" within specific polygons may have lost some necessary context. To restore some of that context, the annotated maps at the end of the appendix spatially identify the polygon to which these comments relate. We are providing this appendix to make certain that the administrative record includes comments that are relevant to each polygon that we surveyed.

Magdalena Ranger District

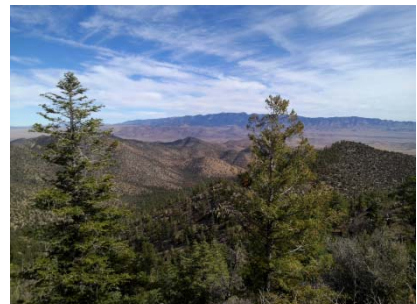
San Mateo Mountains

Polygon D3_ADJ7

This area should have been included in the preliminary wilderness inventory: It's roadless and meets the inventory criteria. The wilderness inventory boundary should have followed the IRA boundary here. The distance between roads 1068 and 1052 is nearly a mile-wide, sufficiently wide for these roads to not intrude into the polygon. Further, following the IRA boundary, or something close, would enable the FS to align the inventory boundary better with area's topographic features as opposed to how the boundary is currently drawn. Comment submitted on 11/18/2014 and recorded as comment #24082 and 24085.

This area should be included in the wilderness inventory. It's roadless and meets the inventory criteria. The FS should use roads 138 and 330 to establish the boundary. The distance between these roads is over a half-mile wide at the entrance; sufficiently wide for this land to be included with the D3_ADJ7 polygon. Additionally, the FS should not allow roads 1043, 1041, and 1040 - at the southern end of the 'peninsula' - to disqualify this land. The Magdalena District's TMP will likely close these spur roads to public motorized use. Furthermore, the Magdalena's TAP Report notes that these roads are low value and not needed. These roads appear to serve no purpose and lead to no facility. Road 1040 is overgrown with vegetation, and the portion that is visible only lasts a few dozen meters before the elements have begun to reclaim it. Comment submitted on 11/20/2014 and recorded as comment #24582.

Other than the missing areas described above, the wilderness inventory boundaries for polygon D3_ADJ7 were correct delineated. The impacts of man are substantially unnoticeable, and the area appears predominantly natural, with sweeping views of the Rio Grande Valley. Solitude is abundant and opportunities for primitive forms of recreation are outstanding. Here is a photograph looking



northeast across the polygon. Photo submitted on 11/18/14 as recorded as comment #24090.

Polygon D3_ADJ8

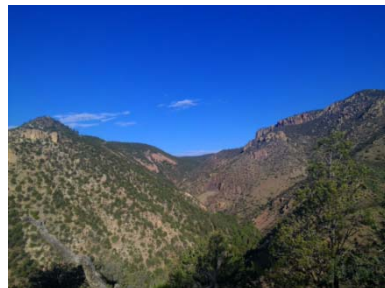
These two comments are associated with an area that is not included in the preliminary wilderness inventory for polygon D3_ADJ8.

- This area is roadless (as defined by the agency's draft inventory and evaluation Handbook as well as the FACA recommendations) and meets the inventory criteria; it should have been included in the wilderness inventory. The FS should use roads 96 and 138 to establish the boundary. The distance between these roads is over a half-mile wide at the southern "entrance" and much of the area remains this wide, which is sufficiently wide for this land to be included with the D3_ADJ8 polygon. Comment submitted on 9/18/2014 and recorded as comment # 18347.
- The FS should not allow roads 865, 867, 861, 873, and the numerous other short spur roads in the vicinity to disqualify this land. These roads are unmaintained and very rough. The Magdalena District's TMP will likely close these routes to public motorized use. Furthermore, the Magdalena Ranger District's Travel Analysis Report found that these roads are low value and notes that the roads are not needed. These roads appear to serve no purpose and lead to no facility. This area should be included in the inventory. Comment submitted on 9/18/2014 and recorded as comment # 18350.

These two comments are associated with an area that is not included in the preliminary wilderness inventory for polygon D3_ADJ8.

- This area is roadless (as defined by the agency's draft inventory and evaluation Handbook as well as the FACA recommendations) and meets the inventory criteria; it should have been included in the wilderness inventory. The FS should use roads 138 and 330 for the inventory boundary. The distance between these roads is over a mile wide at the southern "entrance" and remains over a mile wide for most of the area; sufficiently wide for this land to be included with the D3_ADJ8 polygon. Comment submitted on 9/18/2014 and recorded as comment # 18353.
- The FS should not allow roads 1012 and 1042 (as well as the numerous other short spur roads in the vicinity) to disqualify this land. These roads are unmaintained and very rough. The Magdalena District's TMP will likely designate these routes for administrative use only and close them to public motorized use. Furthermore, the Magdalena District's Travel Analysis Report found that these roads are low value and not needed. These roads appear to serve no purpose and lead to no facility. This area should be included in the inventory. Comment submitted on 9/18/2014 and recorded as comment #18357.

Other than the missing areas described in comments # 18357 and 18353, the wilderness inventory boundary for polygon D3_ADJ8 was correctly delineated. The impacts of man are substantially unnoticeable. Solitude is abundant and opportunities for primitive forms of recreation are outstanding. This photograph shows the northern side of the polygon D3_ADJ8. Photograph submitted on 11/18/2014 and recorded as comment # 24095.



This photograph looks west and was taken in this general vicinity. It shows the east side of polygon D3_ADJ8. The eastside of the polygon boasts lots of opportunity for backcountry recreation, is predominantly natural (barring a few roads) and has wilderness characteristics; it meets all of the wilderness inventory criteria. Photograph and comment submitted on 11/19/2014 and recorded as comment # 24460.



This area is roadless, remote, undeveloped, wild and beautiful. This photo was taken south of the Apache Kid Wilderness and looks north into the wilderness area. Comment and photo submitted on 9/18/2014 and recorded as comment # 18365.



This comment would not load into the interactive map so we are providing it here. This photograph is taken from the west side of polygon D3_ADJ8 and looks east. It shows the west side of the polygon in the foreground and the Apache Kid Wilderness in the background. Due to its size, its roadless characteristics, remarkable views, rugged topography, vegetation, and proximity to the Apache Kid Wilderness, this side of the polygon possesses outstanding opportunities for hiking, camping, backpacking, hunting, and horseback-riding and other forms of primitive recreation. The area appears predominately natural and free of improvements that are substantially noticeable. The polygon meets all of the wilderness inventory criteria and should recommended for wilderness.



Polygon D3_5K16

Several comments and a photo were submitted regarding an area that is not included in the preliminary wilderness inventory on the north side of polygon D3_5K16. Three of these comments are here:

- This route does not exist. There is a steel barrier at the end of this route into Bear Trap Canyon Campground, and there has been obvious decommissioning efforts within the past couple of years. There is no evidence of motor vehicle use on this route, so the barrier and decommissioning efforts are working! The Magdalena Travel Management Plan proposed action has this route proposed for closure, and slated for Maintenance Level 1 status, if not eventual obliteration. The route does not exist on the ground and should be removed from the system network as it pertains to potential wilderness in this area. Comment submitted on 9/10/2014 and recorded as comment # 17310.
- Taking into consideration the information provided by this person about Road 808, this road should not disqualify the land to the north from being included in the wilderness inventory. This land is roadless and meets the inventory criteria. Comment submitted on 9/16/2014 as a response to #17310. Recorded as comment # 18135.

- The triangle to the north should be included for wilderness all the way to the existing wilderness boundary on the east side of the Bear Trap canyon road. Comment submitted on 9/19/2014 as a response to #17310. Recorded as comment # 18627.

This area is roadless and meets the agency's inventory criteria; it should have been included in the wilderness inventory. The FS should use road 549 as the northern boundary and 73 for the southern boundary. The distance between Roads 219A and 549, at its most narrow spot, is over a half-mile wide and then the area extends to well over two miles wide; sufficiently wide for this whole area to be included with the D3_5K16 polygon. Roads 838, 837, and 836 will likely be closed to public motorized use as a result of the Magdalena District's Travel Plan. These routes are also naturally reclaimed and do not exist on the ground. Comment submitted on 11/19/2014 and recorded as comment # 24527.

The following three comments are associated with an area that is not included in the preliminary wilderness inventory for polygon D3_5K16:

- Given the comments that roads 845 and 844 are naturally reclaimed, polygon D3_5K16 should be extended down to include this area. It's part of the larger landscape of wilderness quality land. Comment submitted on 11/19/2014 and recorded as comment # 24531.
- Roads 844 and 845: "I have personally walked both of these roads, and they do not exist on the ground. Lots of vegetative regrowth is occurring and there is no evidence of motor vehicle use on either route. The Magdalena Travel Management Plan proposed action has both of these routes proposed for closure, and slated for MaintenanceLevel 1 status. I understand that without the TMP Proposed Action being finalized that these routes are in a bit of limbo situation, but nonetheless, they do not exist on the ground and should be removed from the system network as it pertains to potential wilderness in this area. Furthermore, these routes could be ideal candidates for decommissioning as nature is already beginning to reclaim them." Comment and photo submitted on 9/10/2014 and recorded as comment # 17297.
- Road 840: "This route is not evident out in the field, other than a single erosion trench. There has been some remediation efforts in the last two years, and the route has been proposed for closure in the Magdalena Ranger District Travel Management Plan proposed action. The route should be removed from the system network, to allow for increased potential wilderness in this area." Comment and photo submitted on 9/10/2014 and recorded as comment # 17314.

The following two comments are associated with an area that is not included in the preliminary wilderness inventory for polygon D3_5K16:

- This segment of Road 862 is not connected to the other roads in the area and is therefore not accessible to public motorized use. I believe the portions of road 862 on either side of this segment are in storage (ML1) and not open to public travel. The Magdalena District's travel plan proposes to close this segment of road 862 to public motorized use. The Travel Analysis Report notes that the road is low value and is not needed. Primary access to this road is via FS Road 73. However, at the junction of FS Road 73 and 73A, the FS has already erected a barrier and displayed a sign stating ROAD CLOSED. The Forest Service should not disqualify the surrounding lands from the wilderness inventory because of this road segment. The surrounding lands are

roadless (as defined by the agency's inventory Handbook at Ch. 70) and meet the inventory criteria. Comment submitted on 9/16/2014 and recorded as comment # 18128.

- These roads (852 and 858) are not connected to the other roads in the area. I believe all of these roads are stored ML 1 roads that are closed to public motorized use and not ML 2s. If these are in fact in ML 1s then the agency should not have used them to disqualify the surrounding lands from the inventory. Regardless, even if the public is technically allowed to drive these roads, they aren't accessible because they aren't connected to the adjacent road network. Further, the Magdalena District's travel plan proposes to close all of these roads to public motorized use. The Travel Analysis Report notes that these roads are low value and are not needed. The Forest Service should not disqualify the surrounding lands from the wilderness inventory because of these roads. The surrounding lands are roadless (as defined by the agency's Ch. 70 inventory handbook) and meet the inventory criteria. Comment submitted on 9/16/2014 and recorded as comment # 18132.

Photo taken at the headwaters of Chimney Canyon, looking northwest at the Datil Mountains on the horizon. There are lots of places to explore and opportunities to experience solitude in this area. I agree with the FS' inventory - this area definitely has wilderness character. Other than the missing areas described above, the wilderness inventory boundary for polygon D3_5K16 was correctly delineated. The impacts of man are substantially unnoticeable, and the area appears predominantly natural. Solitude is abundant and opportunities for primitive forms of recreation are outstanding. Photo and comment submitted on 9/18/14 as recorded as comment #18380.



Magdalena Mountains

Polygon D3_5K2

As we explained in the body of this letter and in Appendix I, the Forest Service should not have excluded the Langmuir Research Site from the wilderness inventory. We provided the following comments on the online tool:

- The FS should include the 31,000 acre Langmuir Research Site in the wilderness inventory. The area meets the inventory criteria laid out by the FS, is wild and undeveloped, and appears natural. In particular, inclusion of the site in the inventory would not conflict with Congress' intent in establishing the site for scientific research purposes. While management of the site as wilderness could potentially result in certain limited conflicts with Congress' intent that the site be managed to protect and enhance opportunities for scientific research, such conflicts likely could be avoided by excluding from the inventory the 1,000-acre principle research facility (approximately 3% of the site) at the top of the mountain where research activities are concentrated. That reasonable approach would allow the USFS to inventory and evaluate the remaining 97% of the site for wilderness characteristics and determine whether to carry the area (or a portion of the area) forward in the NEPA process. Comment submitted 11/02/2014 and recorded as comment # 22841.

- Opportunities to experience solitude and participate in primitive recreation are plentiful within the roadless lands of the Langmuir Site. There are several excellent hiking trails through the area that offer scenic vistas of the vast and beautiful landscape that surrounds the Magdalenas. The chance to stargaze and marvel the night skies are unmatched. There are interesting canyons to explore and wildlife to view or hunt. This area is roadless and should be included in the wilderness inventory. Comment submitted 11/02/2014 and recorded as comment # 22844.

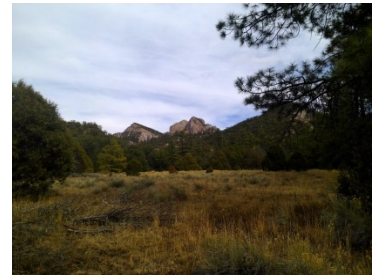
Datil Mountains

Polygon D3_5K11

Photograph looking north across this area and taken near the base of road 100A. This small parcel should be included in polygon D3_5K11. Like the rest of 5K11, this parcel is free of substantially noticeable man-made improvements and appears natural. Comment and photo submitted on 11/19/2014 and recorded as comment # 24248.



Other than a few small areas on the southern perimeter, the wilderness inventory boundary for polygon D3_5K11 was correctly delineated. The impacts of man are substantially unnoticeable. Outstanding opportunities for primitive recreation abound; the feeling of solitude is a dominate in the area. This photograph looks east at Madre Mountain IRA, which is inside the polygon, from Forest Road 6. Comment and photo submitted on 11/19/2014 and recorded as comment # 24230.



Polygon D3_5K10

The wilderness inventory boundary for polygon D3_5K10 was correctly delineated. Similar to polygon D3_5K11, lands within polygon D3_5K10 are free of substantially noticeable manmade improvements. The scenery found throughout the area is alluring, with significant geological features, numerous open meadows to explore, and dramatic ridgelines that offer exceptional views. The Datil Mountains are an isolated landscape within the Cibola Forest that offers solitude. This photograph looks east into the Datil IRA, which is inside the polygon. Comment and photo submitted on 11/19/2014 and recorded as comment # 24241.



Bear Mountains

Polygon D3_5K7

Ch. 71.21 outlines the size criteria that the agency should follow during the inventory. Criterion 3 instructs the agency to include areas in the inventory that are "contiguous to existing wilderness, primitive areas, administratively



recommended wilderness, or wilderness inventories of other Federal ownership, regardless of their size.” The FS narrowed this criterion by including only those areas that are ‘adjacent to existing Wilderness, regardless of size.’ This area is an example where the FS did not include in the inventory an area that is less than 5,000 acres but is adjacent to a BLM Wilderness Study Area (WSA), which qualifies as administratively recommended wilderness. The travel plan will likely close to public motorized use the last mile of 354XA, which would mean that no publicly available motorized roads and trails would be designated in the area. This area meets all of the inventory criteria and has wilderness characteristics. This photograph looks north across the area. Photo and comment submitted on 11/19/2014 and recorded as comment # 24217.

Other than the large areas that are missing from the wilderness inventory – as detailed in Arian Pregenzer’s comments below – the wilderness inventory boundaries for polygons D3_5K7 and D3_5K6 were correctly delineated. The impacts of man are substantially unnoticeable, and the area appears predominantly natural. Solitude is abundant and opportunities for primitive forms of recreation are outstanding. Here is a photograph looking northeast across the polygon. Photo submitted on 11/18/14 as recorded as comment #24090.

Mt. Taylor Ranger District

Polygon #D2_5K12

The following comment and photo were submitted by Nathan Newcomer on 9/11/14 and recorded as comment # 17472: “This area is called the Guadalupe Inventoried Roadless Area, and it is immediately adjacent to several BLM WSAs. I believe the Cibola USFS is correct in showing that this area possesses potential wilderness, due to the remoteness of the area, its size, important elk habitat, and archeological history.”



Sandia Ranger District

D5_ADJ5

With so many trailheads, hiking trails, picnic tables, and other developed rec facilities while also offering easy access to an incredible wilderness area, the Forest Service should create a special area that emphasizes outdoor education. This polygon and the area to the south could be managed to retain its natural character (i.e., no new road building, etc.) with an emphasis on outdoor learning. Comment submitted on 11/19/2014 and recorded as comment # 24487.

**Comments on Forest Service Bear, Magdalena, and Sandia Mountains Inventory
Submitted by Arian Pregenzer**

Magdalena Ranger District

Bear Mountains and Environs

1. Inventoried Roadless Area at NE corner adjacent to D3_5K7 that was left out of FS inventory:

This beautiful, remote area should be included as part of the wilderness inventory. CR12A, CR12B and CR12C are accessible only by an ATV, and are slated to be closed in the TMP "proposed action." I hiked throughout this area in the summer of 2014 and found it to be free of vehicle tracks and human development, except for a couple places where the permittee has put PVC into a spring at the end of CR12C. The permittee accesses areas on horse because of the impassibility of so-called roads. Access to this area from 354E is behind a locked gate, making it easy to prevent unauthorized access. Access from the north is very difficult, up very rugged arroyos. Would be easy to lock the gate at the forest boundary on CR12A. I saw no people during several days of hiking in the area, other than the permittee at his house (small private area about half a mile W of 354 on 354E). There are stunning canyons and springs toward the end of CR12A (see picture), and the ruins of a homestead at the end of CR12B.



2. Area north of my property, bordering BLM WSA: This remote and undeveloped area should be included as part of the Forest Service inventory as it would connect the BLM Sierra Ladrones WSA and the Bear Mountains. The only current human development in the entire area is an active stock tank and solar panel one mile up 354XA in Baca Canyon, at the point where the TMP proposed action suggests closing 354XA, but nothing beyond that. There is a disconnected, rusted out windmill about a mile up 354U that is not in use. 354U would only be accessible by ATV after about the first half mile. Baca Canyon is a rare riparian area to the east of 354, with ruins of an old homestead. There is no sign of vehicle tracks (except along one fenceline for less than half mile) in the entire area south of Baca Canyon to my property and 354O. Very remote, with sandstone canyons, beautiful views of the Bears and Sierra Ladrones. I own the only private property in the area and have stipulated in my will that it be treated as wilderness after my demise.

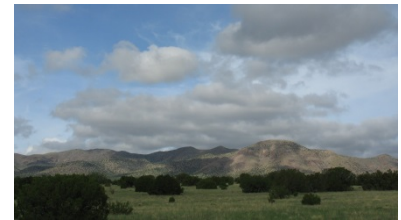


Area south of my property bordering 354O and 354: This small area should also be included in the wilderness inventory. I own the property to the north would consider donating part of my land so as to provide contiguity. There is no development in this area, no vehicle tracks, and the land is in good condition.

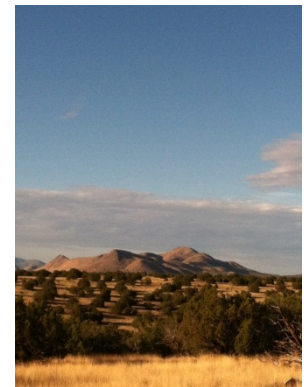


3. **General D3_5K7:** This area is rightly included as part of the Wilderness Inventory. It includes the heart of the Bear Mountains, Hell's Mesa and countless rugged, wild canyons, especially on the eastern side. There are mountain lion, bear, elk, deer and countless birds at the many riparian areas. I've spent many hours over the last 20 years hiking and wandering in this area and have never seen a single person. It is a perfect place for solitude and experiencing the vastness of New Mexico.

4. **D3_5K7 East Side: north of 354P, west to Bears ridgeline, south of CR12E:** This eastern area of the Bear Mountains is clearly worthy of wilderness consideration. It has rugged canyons, many riparian areas, and countless havens for wildlife. The picture shows the beautiful and iconic Hell's Mesa. The roads suggested for closure in the Travel Management Plan Proposed Action are not used, and most are not accessible except by ATV.



5. **General D3_5K6:** This area is rightly included as part of the Wilderness Inventory. It includes the southern section of the Bears as well as many foothills. In my opinion, it is also right to include areas for consideration that are not part of the "inventoried roadless area" as they are contiguous to it, and free of viable roads. I'll provide more detailed comments on particular areas, but want to voice general support for including this area. The photo shows some of the lovely foothills of the Bears, just N or 506.



6. **Triangular Area between 354, 354L, and 506 (D3_5K6):** I support including this area for consideration as Wilderness, with cherry stems for 354L and 354LL. The photo shows the Bears from the end of 354L. The little hills are almost untouched, beautiful, and have no development in them except as noted below. I drove and hiked all "roads" in the summer of 2014, and found that 354L becomes too rough for anything but an ATV just above the spot shown as the end of 354L on the Forest Service maps. At that point there is some significant development -- corrals, stock tanks, etc. There is also a stock tank at the end of 354LL, but nothing past that point. I also hiked 354J and K, and found no development. After hiking, I drove up 506 and found the exit of what could have been the continuation of 354LL. However, it was so badly eroded I couldn't drive in from 506. It looks like the



Bear Springs Ranch uses Bear Canyon as a shortcut to their development at the end of 354L, even though it is not a designated forest service road.

- 7. Area from the ridge of Bears, south to 506, and south of 354N.** This eastern portion of the Bears is rightly included as worthy of consideration for wilderness. South of 354N (the northern boundary) there are no roads and no development. The photo shows a view of the Sierra Ladrones from a typical canyon in the Bears -- green after the monsoons.



- 8. Area Immediately S and E of 24:** This section is definitely worthy of consideration for wilderness. I hiked and drove this area in the summer of 2014 and there is essentially no human development other than about 100 feet from 24. There is a stock tank, solar panels, and corral at the end of 24. I could find no evidence of 24B or 24BJ. 24A had some vehicle tracks, but no development, no PVC, excepting a bermed stock pond about 1.6 miles from 24. Vehicular traffic is not possible past this point. The photo shows a view of the San Mateo Mountains from the bottom of 24A.

- 9. Area between 169 and 506, to origin of 24:** There is quite a lot of development associated with the Bear Springs ranch in this area near 169, including many new tracks and roads. 24C as shown on the FS map does not intersect 169, but it is definitely a track, although the only human development is a large stock tank at the SW end (shown in photo). I could find no evidence of 24CB or 24CE or 24 CA*B. However, there is a track about 200 feet in from 169 that parallels it. 506 L has a stock tank near 169 and about 2 miles in, but no other development. I'm hesitant to recommend this area for consideration of wilderness.



- 10. West side of Bears above 24:** The western slopes and watersheds of the Bears are appropriately designated as having wilderness potential. Other than 123F, there is very limited access to any of this territory except through private property and behind locked gates. I hiked this area in the summer of 2014, and saw no evidence of development along 24CA, or 123F after the intersection with 123FAB, nor on 123FB. 123B is completely washed out by an arroyo at 123 (shown in photo), and there is no evidence of any vehicle traffic. 123 GB is behind a locked gate, and there is no evidence of vehicle traffic where it meets 123. I can see no reason not to close 123GB and GB within the national forest, 123B, and 123F after intersection with 123FAB.



- 11. D3 5K5:** This area, which is the Goat Springs inventoried roadless area, should be thoroughly assessed for wilderness potential. It has numerous archaeological sites, and the hills are largely unscathed by human development.
- 12. D3 5K4:** This area should be thoroughly assessed for wilderness potential. There is little evidence of human development and the Forest Service TMP proposed action recommends closing the tracks/roads in this area.

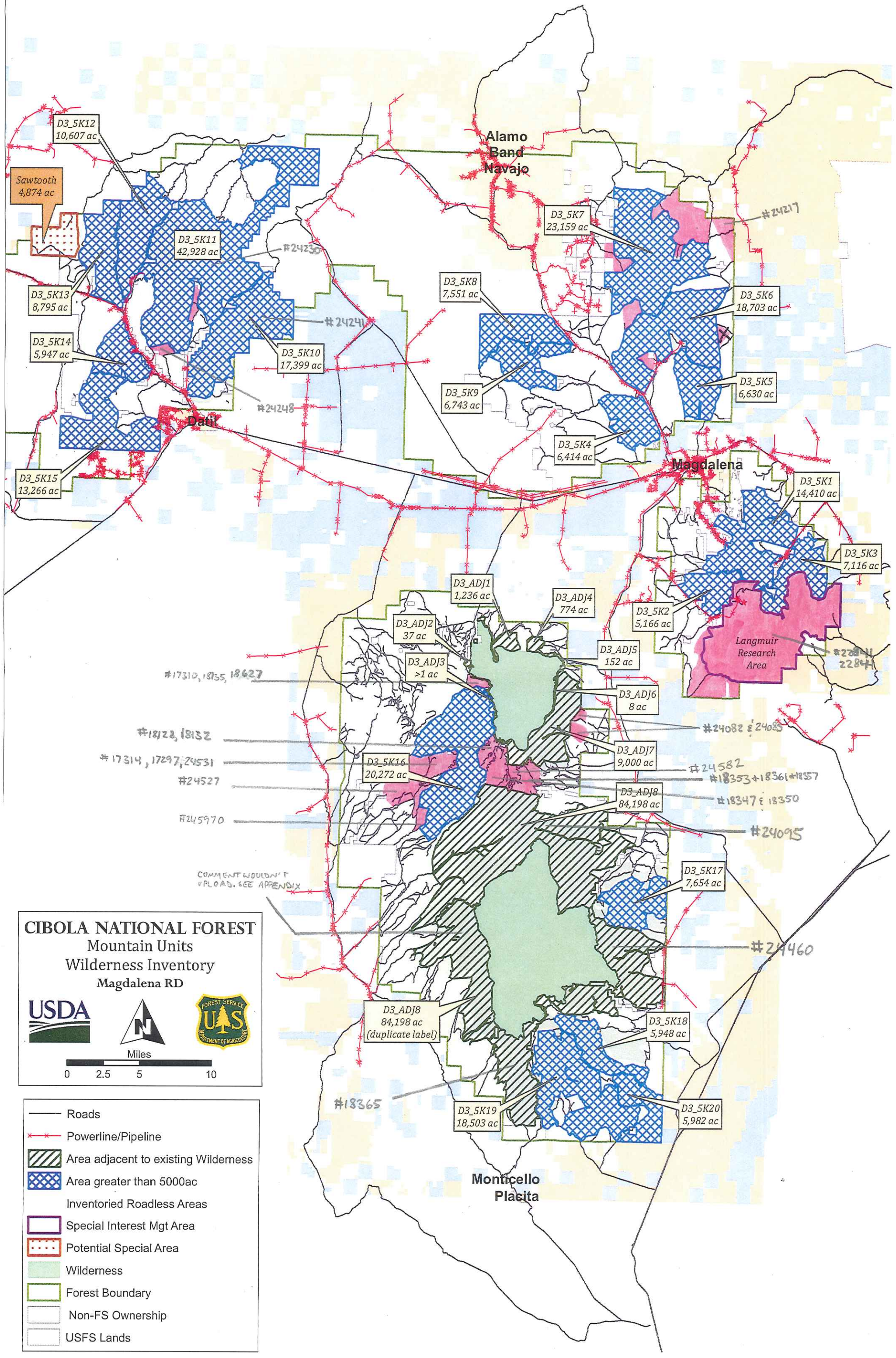
- 13. D3_5K8 and D3_5K9n / Gallinas Mountains:** These large areas of pinon-juniper woodland should be thoroughly assessed for wilderness potential. There appears to be little human development, and few tracks or roads.

Magdalena Mountains

- 1. D3_571, D3_5K3, and D3_5K2:** I had always thought that the Magdalena Mountains were already designated wilderness. The few mines and ruins of mines could easily be avoided, or cherry-stemmed. For the most part the Magdalenas are devoid of human development and provide wonderful opportunities for hiking, backpacking, and unsurpassed solitude. Please include this area as part of the wilderness assessment. (For some reason, the interactive map would not accept this polygon / comment. I entered it twice, and it doesn't appear.)

Sandia Ranger District

- 1.** All of the areas adjacent to the Sandia Mountain Wilderness (D5_ADJ1 - D5_ADJ0) deserve to be included in this wilderness inventory. They should also be monitored more closely. I would also support clarifying the trails that are accessible to bikes in the area bordering Albuquerque Open Space, as each year more "ad hoc" bike trails are added. Designating as wilderness would be a great step forward.



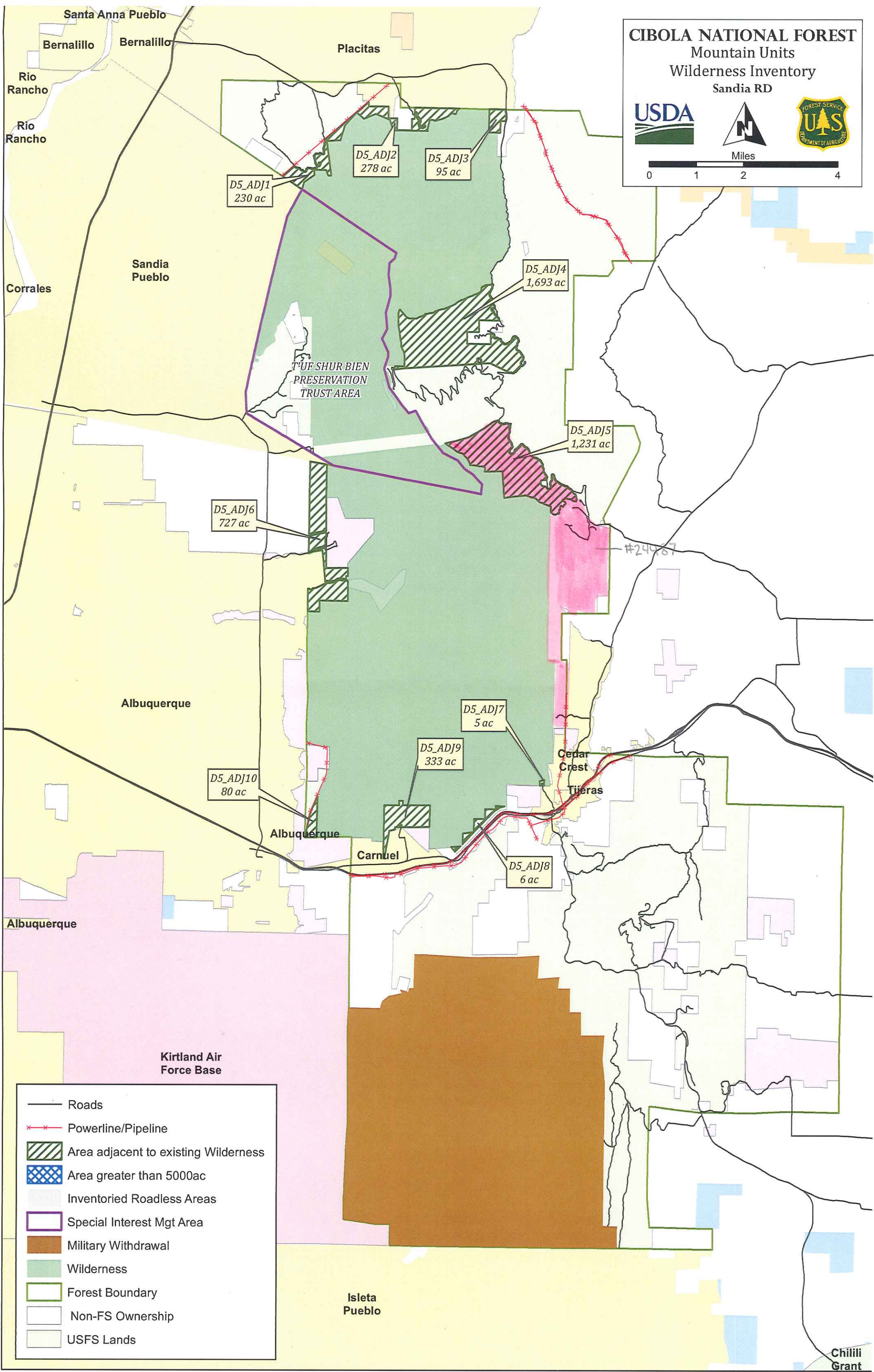
CIBOLA NATIONAL FOREST
Mountain Units
Wilderness Inventory
Magdalena RD



Miles

0 2.5 5 10

- Roads
- ✖ Powerline/Pipeline
- ▨ Area adjacent to existing Wilderness
- ▤ Area greater than 5000ac
- ▤ Inventoried Roadless Areas
- ▤ Special Interest Mgt Area
- ▤ Potential Special Area
- ▤ Wilderness
- ▤ Forest Boundary
- ▤ Non-FS Ownership
- ▤ USFS Lands



CIBOLA NATIONAL FOREST
Mountain Units
Wilderness Inventory
Sandia RD

USDA

FOREST SERVICE
U.S. DEPARTMENT OF AGRICULTURE

Miles
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- Roads
- ××× Powerline/Pipeline
- ▨ Area adjacent to existing Wilderness
- ▤ Area greater than 5000ac
- ░ Inventoried Roadless Areas
- ▭ Special Interest Mgt Area
- Military Withdrawal
- Wilderness
- ▭ Forest Boundary
- ░ Non-FS Ownership
- ░ USFS Lands

