



**DEPARTMENT OF AGRICULTURE
STATE OF NEW MEXICO**

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September 24, 2015

Ms. Elaine B. Kohrman, Forest Supervisor
Mr. Champe Green, Forest Planner
Cibola National Forest
United States Forest Service
2113 Osuna Road, NE
Albuquerque, NM 87113

RE: Draft Forest-Wide Ecological and Socioeconomic Desired Conditions for the Cibola National Forest Mountain Ranger Districts' Forest Plan Revision Process

Dear Ms. Kohrman and Mr. Green:

New Mexico Department of Agriculture (NMDA) submits the following comments and feedback on the Cibola National Forest's (Cibola NF) Draft Forest-Wide Ecological and Socioeconomic Desired Conditions document (dated July 17, 2015) (DDCs) that were developed as part of the Forest Plan Revision process. We have used the comment forms provided by the Cibola NF in the following pages.

One part of NMDA's role is to provide proactive advocacy and promotion of New Mexico's agricultural industries. NMDA supports management of National Forest System lands under the principles of multiple use and sustained yield as congressionally mandated by the Multiple-Use and Sustained-Yield Act of 1960 (16 U.S.C. 528-531) and further codified by the National Forest Management Act of 1976 (16 U.S.C. 1601-1614).

Thank you for the opportunity to comment on these Draft Forest-Wide Ecological and Socioeconomic Desired Conditions. We look forward to continuing to work with the Cibola NF on the Forest Plan Revision process. Please contact Ms. Lacy Levine at (575) 646-8024 or llevine@nmda.nmsu.edu with any questions regarding these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff M. Witte".

Jeff M. Witte

JMW/ll/ya

Date: September 24, 2015 **Name:** Lacy Levine, New Mexico Department of Agriculture

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Please use the table below to make comments on the draft Desired Conditions and Vision Statements document. Please be as specific as you can and include the page and line numbers, the resource topic, the management area involved, and your comment.

Page #	Line #	Subject of Comment	Comment
Throughout	Throughout	“Background and Description” subsection title	Please add the subsection title “Background and Description” after all section titles to be consistent with the rest of the document. An example of where the subsection title is missing is under “Surface Water Resources” on page 52, line 13. However, this is not the only instance and should be corrected throughout the entire document.
1	16-18	Introduction	To our understanding, the landscape teams have not yet provided input on “other plan content including standards, guidelines, and management approaches.” Though we look forward to providing this level of input, these discussions have not yet taken place in detail; and this sentence should be revised accordingly.
6	19-20	Forest Insects and Disease - Desired Conditions	NMDA requests that an additional Desired Condition be added to this section that addresses monitoring, recovering, and mitigating severe and/or uncharacteristic disease outbreaks to ensure watershed health. It is not enough to simply desire that only endemic infestations will occur – severe outbreaks must be addressed.

Page #	Line #	Subject of Comment	Comment
42	1-2	Fremont Cottonwood-Conifer	Please add the elevations at which this vegetation type occurs.
52	2-4	Water Rights	The beginning of the “Watershed Resources” section states, “Water rights is also included in this section, since management of water rights is related to water resources...” A water rights section is not included, and there is no direct discussion of water rights in this section. Please remove reference to a water rights section unless the section was removed in error, in which case the water rights section should be re-added and republished for public comment.
53	7-8	Desired Conditions: Groundwater Withdrawals	Given the relationship between groundwater and surface water, it may not be feasible to achieve this DDC due to the fact that groundwater withdrawals are a necessity for water access by communities and forest users alike – especially in times of drought, which are expected to become more frequent in the future. Also, the USFS does not have purview over groundwater withdrawal activity. Therefore, this DDC may not be feasible under the management of the Cibola NF’s Forest Plan.
59	12-15	Nonnative Invasive Species – Background and Description	<p>The Noxious Weeds Management Act (76-7D-1-6) directs NMDA to develop a noxious weed list for the state, identify methods of control for designated species, and educate the public about noxious weeds. NMDA coordinates weed management among local, state, and federal land managers as well as private land owners. NMDA maintains a list entitled “Troublesome Weeds of New Mexico,” which is available at http://www.nmda.nmsu.edu/apr/noxious-weed-information/.</p> <p>The Appendix includes a table of troublesome weeds in counties that overlap and surround the Cibola NF. NMDA classifies noxious weeds into “Watch List Species,” “Class A Species,” “Class B Species,” and “Class C Species,” which are described in the Appendix.</p> <p>NMDA requests that special management consideration be given to all the species contained in the Appendix in order to limit, and hopefully eradicate, any noxious weeds in New Mexico.</p>

Page #	Line #	Subject of Comment	Comment
59	28	Nonnative Invasive Species – Desired Conditions	One desired condition for this section states, “Desirable non-native species are managed.” This statement is too vague to achieve a desired condition. NMDA recommends that the statement be revised to state, “Desirable non-native species are managed in such a way that they do not conflict with the recovery of native species or existing multiple uses.”
61	23	Fire and Fuels – Desired Conditions	NMDA suggests that another DDC be added to this section regarding Wildland-Urban Interfaces (WUIs). We suggest, “Fire management strategies in WUIs and elsewhere are maintained at sustainable levels to protect lives, property, and watersheds.” Specifically addressing WUIs will become even more important during the life of the Forest Plan, so including a DDC will assist in management direction now and in the future.
61	26	Range and Grazing – Background and Description	The first sentence of this section states, “There is Congressional intent to allow grazing on suitable lands...” The term “intent” should be replaced with “mandate” to reflect that grazing is mandated under the Multiple-Use and Sustained-Yield Act of 1960.
61	29-33	Range and Grazing – Background	This portion of the Background addresses allotment management plans. NMDA requests that reference be provided to New Mexico Statute Chapter 76, Article 7C-1(B), which states, “...management plans may be revised or terminated or new plans developed from time to time after such review and careful and considered consultation, cooperation and coordination with all permittees, lessees and landowners involved and, if appropriate, with the New Mexico department of agriculture and the range improvement task force staff of New Mexico state university.” NMDA remains committed to this purpose and is available to participate in this process at the request of the agency, permittees, or landowners involved.

Page #	Line #	Subject of Comment	Comment
62	16-18	Range and Grazing – Desired Conditions	One DDC in this section states, “Livestock grazing and associated management activities are in balance with the needs of wildlife forage, watershed groundcover, natural fire regime, and resilience to climate variability.” NMDA requests that this DDC be edited to state, “Collaborative planning between grazing permit holders and the Cibola NF results in livestock grazing and associated management activities that are in balance with the needs of wildlife forage, watershed groundcover, natural fire regime, and resilience to climate variability as well as the management needs of grazing permit holders.” Including language that includes collaboration between the Cibola NF and forest users in this and other DDCs will help in the long-term success of the management of the forest.
66	37-38	Lands – Desired Conditions	One DDC in this sections states, “Acquisition of lands facilitate efficient management strategies for the Cibola NF.” While land acquisition may make sense from a forest management perspective, NMDA requests the Cibola NF exchange or sell existing Cibola NF lands to affected counties in conjunction with acquisitions to ensure a stable tax base for the affected counties. The DDC should reflect this equitable approach to land acquisitions.
68	1-2	Minerals and Geology – Desired Conditions	One DDC in this section states, “Reclamation is carried out concurrently with mining; restoration of the environment takes place at the earliest opportunity for each area on a mine site.” NMDA requests this DDC be edited to state, “Reclamation is carried out concurrently with mining; restoration of the environment takes place at the earliest opportunity for each area on a mine site; and adequate bonds are collected to ensure appropriate closure for operations of all sizes.” Adequate bonding provides the funding for environmental mitigation during and after the closure of a mine and must be ensured for long-term watershed health.

Page #	Line #	Subject of Comment	Comment
73	Whole section	Designated Areas – Desired Conditions- General	<p>NMDA requests that an additional DDC be added to this section to address stakeholder involvement in management decisions. We suggest the following be added as a DDC: “Forest Service management and decision making for designated areas will involve stakeholders involved in the management of a given area. This includes appropriate state and local agencies as well as grazing permittees and land users.”</p> <p>Coordination with stakeholders before management changes occur on both specially designated areas and undesignated areas will assist in the overall long term success of forest management and planning.</p>
74	15-16	Wilderness – Desired Conditions	<p>NMDA understands the USFS is required to protect, “congressionally designated wilderness areas as well as management of areas recommended for wilderness designation to protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation” (36 CFR 219.10 (b) (1) (iv)).</p> <p>However, sustainable grazing management and access should be maintained in current grazing allotments to fulfil the multiple-use and sustained yield policies of the USFS.</p> <p>One DDC in this section states, “Recommended wilderness areas are managed to protect and enhance the wilderness character that exists at the time of recommendation.” NMDA requests this DDC be edited to state, “Recommended wilderness areas are managed to protect and enhance the wilderness character that exists at the time of recommendation while also maintaining existing multiple uses of the forest.”</p>

Page #	Line #	Subject of Comment	Comment
75	19-34	Scenic Resources – Desired Conditions	The DDCs in this section explain the importance of scenery and that scenery will be a component of <u>all</u> resource management decisions. NMDA asserts that scenery is not a scientific indicator of watershed health; while it can be used as a quick (though subjective) visual tool, range health monitoring must take prevalence in management decisions for resources – especially grazing. NMDA requests that all DDCs that discuss management decisions based on scenery be edited to reflect this important point.
80-81 and Throughout	All and Throughout	Literature Cited	The Literature Cited section is a useful resource. NMDA requests that citations be referenced throughout the body of the DDC in the applicable places either through footnotes or in-text citations. This will assist readers in understanding where information sources can be found much more easily.

Appendix

		Counties												# Counties Where Species Reported
Common Name	Scientific Name	McKinley	Sandoval	Santa Fe	Los Alamos	Cibola	Bernalillo	Valencia	Torrance	Catron	Socorro	Lincoln	Sierra	
NMDA Watch List Species														
Meadow knapweed*	<i>Centaurea pratensis</i>													0
Giant Cane	<i>Arundo donax</i>		X				X	X					X	4
Pampasgrass	<i>Cortaderia selloana</i>		X				X							2
Quackgrass	<i>Elytrigia repens</i>			X										1
Sahara mustard	<i>Brassica tournefortii</i>						X							1
Spiny cocklebur	<i>Xanthium spinosum</i>								X	X	X	X		4
NMDA Class A Species														
Whitetop (aka Hoary cress)	<i>Cardaria draba</i>	X	X		X	X	X	X	X	X	X	X	X	11
Diffuse knapweed	<i>Centaurea diffusa</i>	X	X	X										3
Yellow starthistle	<i>Centaurea solstitialis</i>	X	X									X		3
Canada thistle	<i>Cirsium arvense</i>	X	X	X	X		X		X			X		7
Leafy spurge	<i>Euphorbia esula</i>											X		1
Yellow toadflax	<i>Linaria vulgaris</i>		X		X		X		X					4
Scotch thistle	<i>Onopordum acanthium</i>	X	X	X		X		X	X					6
Camelthorn	<i>Alhagi maurorum</i>	X				X	X	X			X		X	6
Eurasian watermilfoil	<i>Myriophyllum spicatum</i>		X							X	X	X	X	5
Purple loosestrife	<i>Lythrum salicaria</i>						X							1
Spotted knapweed	<i>Centaurea biebersteinii</i>	X	X			X	X			X				5
Dalmatian toadflax	<i>Linaria dalmatica</i>	X	X	X			X		X			X		6
Dyers woad	<i>Isatis tinctoria</i>		X	X										2
Alfombrailla*	<i>Drymaria arenarioides</i>													0
Giant salvinia*	<i>Salvinia molesta</i>													0
Hydrilla	<i>Hydrilla verticillata</i>		X											1
Oxeye daisy	<i>Leucanthemum vulgare</i>		X									X		2
Ravennagrass	<i>Saccharum ravennae</i>						X							1
Parrotfeather	<i>Myriophyllum aquaticum</i>						X	X			X		X	4
NMDA Class B Species														
Musk thistle	<i>Carduus nutans</i>	X	X	X	X	X	X	X	X	X	X	X		11
Russian knapweed	<i>Acroptilon repens</i>	X	X	X	X	X	X	X	X	X	X	X	X	12
Perennial pepperweed	<i>Lepidium latifolium</i>	X	X	X	X	X	X	X	X		X		X	10
African rue	<i>Peganum harmala</i>					X	X				X	X	X	5
Halogeton	<i>Halogeton glomeratus</i>	X	X											2
Poison hemlock	<i>Conium maculatum</i>	X	X				X			X		X		5
Tree of heaven	<i>Ailanthus altissima</i>		X		X		X	X			X	X	X	7
Malta starthistle	<i>Centaurea melitensis</i>												X	
Chicory	<i>Cichorium intybus</i>	X		X	X		X		X					5
NMDA Class C Species														
Bull thistle	<i>Cirsium vulgare</i>	X	X	X	X		X	X		X	X	X		9
Russian olive	<i>Elaeagnus angustifolia</i>	X	X	X	X	X	X	X	X	X	X	X	X	12
Tamarisk	<i>Tamarix spp.</i>	X	X	X	X	X	X	X	X	X	X	X	X	12
Cheatgrass	<i>Bromus tectorum</i>	X	X	X	X	X	X	X	X	X	X	X	X	12
Jointed goatgrass	<i>Aegilops cylindrica</i>		X	X			X		X			X		5
Siberian elm	<i>Ulmus pumila</i>	X	X	X	X	X	X	X	X	X	X	X	X	12
# Invasive Species in County		19	26	16	13	12	25	14	15	12	15	19	14	
*Species has not been reported in New Mexico but is a species to be aware of.														

NMDA classifies noxious weeds into “Watch List Species,” “Class A Species,” “Class B Species,” and “Class C Species,” which are described below:

NMDA Watch List Species: Watch List species are of concern in New Mexico and have the potential to become problematic. More data are needed to determine if these species should be listed. When these species are encountered, please document their location and contact appropriate authorities.

NMDA Class A Species: Class A species are either currently not present in New Mexico or have limited distribution. However, preventing new infestations of these species and eradicating existing infestations are the highest priorities for NMDA.

NMDA Class B Species: Class B species are limited to portions of the state. In areas with severe infestations, management should be designed to contain the infestation and stop any further spread.

NMDA Class C Species: Class C species are widespread in the state. Management decisions for these species should be determined at the local level, based on feasibility of control and level of infestation.