



New Mexico Federal Lands Council

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August 31, 2016

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Cibola National Forest All Units
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Attention: sarahbrowne@fs.fed.us

RE: Cibola Forest Revision Plan / Comment deadline August 31, 2016

To Whom It May Concern:

On behalf of the New Mexico Federal Land Council, representing federal allotment owners, we appreciate the opportunity to comment on the Cibola Forest Revision Plan. Our primary concerns are that access to land for grazing will be made inaccessible by the recommended wilderness areas and the increased risk for fire danger if these lands eventually become designated wilderness or are treated as such.

This potential inaccessibility could affect grazing allotment permit holders. The continued availability of access to allotments is important to our membership, the economic vitality of rural economies, range health, and the customs and culture of many people in New Mexico. It is vital that your staff consult and coordinate with all affected grazing permit holders in the Cibola National Forest throughout this process to ensure agricultural producers retain their maximum permitted grazing animal unit months (AUMs) and unrestricted access needed to maintain range improvements and manage livestock grazing on their allotments.

- For permitted livestock grazing activities in recommended wilderness areas, annual operation instructions shall be updated to reflect any motorized or mechanized use which may be required to administer terms and conditions under the term grazing permit (such as repair or reconstruction of fences, water developments) that may have been approved under exceptions outlined in Forest Service Manual 2320–Wilderness Management, section 2323.22.
- When motorized transport and mechanized use associated with grazing allotments is authorized in recommended wilderness areas, it shall be limited to that needed to carry out

management activities of practical necessity and reasonableness, following the rationale of Forest Service Manual 2320–Wilderness Management, section 2323.2, and shall not degrade the wilderness character of the area. (pg. 80, Lines 23 - 32)

This non-impairment policy extends the protection of congressionally designated wilderness areas to recommended wilderness areas identified in this process. It is beyond the authority of USFS to manage an area as wilderness unless and until Congress actually designates such areas pursuant to the Wilderness Act of 1964. We ask that the standards be edited to allow for existing motorized and mechanical access to continue at levels consistent with current grazing permits. This will allow for continued multiple use of the land.

We would also like to point out that there is a great need to make this process a collaborative planning effort between permit holders and the Cibola National Forest. Impacted allotment owners who pay for their access and improvements on their allotments have not been included or consulted in this process that can have dramatic consequences for their families and small business. There is an overall lack of clarity in this document and its' potential on allotment owners and land stewards. Permit holders need to be contacted and included in this process due to the potential impact it will have on them and their livelihood.

Based on the information available at this time, NMFLC supports Alternative C.

Here are the reasons for we are support of this alternative:

- This alternative appears to be the best approach for preventing further and future catastrophic fires. More designation of wilderness will only lead to increasing over-growth with no way to address fires because of the “untrammeled by man” mandate in the Wilderness Act of 1964.
- Alternative C removes all Management Areas
- Alternative C provides for the use of federal lands by the greatest amount of the population.
- Alternative C minimizes the number of law enforcement and other personnel needed by the government to manage additional designations. It is clear that current funding is inadequate to manage lands now under federal designation. Every effort must be made to reduce the \$19 trillion debt that shadows Americans.
- Alternative C respects the custom and culture of all New Mexico ranchers, wood gathers, hunters, fishermen and many others who routinely utilize these lands.
- Alternative C respects the investments of both federal natural resources agencies and land stewards in infrastructure that supports both wildlife and domestic animals.

General comments:

- All other alternatives create additional unfunded mandates to allotment owners.
- All other alternatives present access issues for land stewards to their contracted allotments, working facilities and watering facilities.

- The location and close proximity to public highways, communities and facilities of Alternatives B, D and E are impractical to be considered wilderness and special designation options.

We greatly appreciate the opportunity to comment. NMFLC urges you to re-evaluate the recommended wilderness areas and speak with those potentially affected if these designated lands were to become wilderness designation.

Respectfully,

Bebo Lee

Don L. (Bebo) Lee
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