**Cibola National Forest Mountain Ranger Districts**

***Comment Form for use with***

***Preliminary Draft Plan, Wilderness Process Paper, and all maps***

| **Document Reviewed (draft plan, wilderness process paper, map)** | **Resource Section** | **Page #** | **Line #** | **Comment** |
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| Draft Plan | Chapter 1, Introduction, Vision and Niche Statements | 10 | 6 | Very unfortunate the Sandia Ranger District does not even have a draft vision statement. Parts of the Mt. Taylor vision statement are very applicable and could serve as a foundation. Understood that the SRD is in a more complex situation being adjacent to a metropolitan area. |
| Draft Plan | Chapter 2, General Recreation, Background and Description | 106 | 19 | The range of opportunities should be modified to read “…quality recreation, **educational,** and tourism opportunities.” The change would recognize the need to support organizations seeking varied educational opportunities in the Forest. |
| Draft Plan | Chapter 2, General Recreation, Desired Conditions | 106 | 37 | To reflect the Cibola National Forest efforts to educate the public on Forest lands, modify the line as follows: “…recreation, **educational,** and tourism opportunities…” |
| Draft Plan | Chapter 2, General Recreation, Desired Conditions | 107 | 21 | The condition should be modified as follows: “…for Forest users, **including those with disabilities.**” to acknowledge the need to be inclusive, especially for the growing population of disabled veterans. |
| Draft Plan | Chapter 2, General Recreation, Management Approaches | 108 | 17 | Rather than define the draft management area for the Sandia Ranger District as outlined in Alternative B, modify the line as follows: “…a sustainable recreation program **with educational opportunities**, including…”. This supports the intent of components listed in Lines 23, 25, 30, and 34 and obviates the need for the East Mountain Outdoor Education/Recreation MA. |
| Draft Plan | Chapter 2, General Recreation, Management Approaches | 108 | Add after 36 | Add another management approach: “**In all planning activities, consider the needs of the handicapped so the ecosystems at different altitudes and exposures and the wilderness qualities of the Forest can be experienced by all.**” Many handicapped persons, including a growing population of disabled veterans should have similar opportunities for enjoying the Forest, including wheeled access on sustainable trail systems. |
| Draft Plan | Chapter 2, Developed Recreation | 109 | 20 | A comma should be added after “areas” since picnic areas and trailheads are two different types of developed recreation. |
| Draft Plan | Chapter 2, Developed Recreation, Management Approaches | 111 | Add after 32 | Add another management approach: “**Consider installing features or devices to facilitate rapid closure of recreational areas to users in the event of a wildfire, during severe drought, or to minimize impacts to wildlife.**” Fencing, gates, and signage should be considered to prevent public entry when Forest closures are necessary. |
| Draft Plan | Chapter 2, Developed Recreation, Management Approaches | 111 | Add after 32 | Another management approach should be added: “**Consider fostering flexibility to accommodate changing trends in recreation when extending or modifying trail systems.**” Trail system uses are not static but are driven by the changing needs and desires of the recreating public. For the Forest Plan to be a viable tool for the next fifteen years, the evolving needs of the recreating public will need to be considered. |
| Draft Plan | Chapter 2, Dispersed Recreation, Desired Conditions | 112 | 14 | The condition should be modified to state: “and other public lands…**and are planned to develop or enhance trail networks when possible.**” Planning should always emphasize improving the connectivity of area trails. |
| Draft Plan | Chapter 2, Dispersed Recreation, Desired Conditions | 112 | 27 | The guideline should be modified to state “...designed, constructed, rerouted, **closed,** or maintained…”. |
| Draft Plan | Chapter 2, Dispersed Recreation, Guidelines | 112 | 27, 28 | In addition, trail design or modification should always consider the potential to enhance area trail systems and develop or improve access points. |
| Draft Plan | Chapter 2, Dispersed Recreation, Guidelines | 113 | 3 | Not only should new trails “avoid travelling through” the listed areas of concern, new trails should avoid being extended in close proximity to these same areas. |
| Draft Plan | Chapter 2, Dispersed Recreation | 114 | 9, 10 | Planning for new trails or modifications to the trail system should consider any opportunities for networking trail systems in addition to destination or loop opportunities. Consider modifying to: “Consider destination, loop, **and networking** opportunities, when new trails…”. |
| Draft Plan | Chapter 2, Dispersed Recreation | 114 | 11 | For completeness, the approach should read as: “Consider analyzing, adding, **and/or closing** unauthorized trails…” |
| Draft Plan | Chapter 2, Dispersed Recreation, Management Approaches | 114 | Add after 15 | The following approach should be added: “**Coordinate and communicate with local agencies and community organizations in planning trail system extensions or modifications.**” |
| Draft Plan | Chapter 2, Dispersed Recreation, Management Approaches | 114 | 21, 22 | Cooperation between agencies and communities for snow removal is important but it should be noted that access to winter outdoor activities is secondary to clearing roads for emergency access, power grid operation, communications, schools, homes, and businesses. |
| Draft Plan | Chapter 2, Scenic Resources, Guidelines | 116 | Add After 33 | The following guideline should be added: “**Exterior lighting for new facilities, either recreational, non-recreational, or for the Forest Service, should be designed to direct light where needed and minimize light pollution.**” |
| Draft Plan | Chapter 2, Special Uses, Desired Conditions | 118 | 7 | The condition should be modified to read: “Environmental, visual, and sound impacts of emerging **forms of** **recreation**, technology, communications sites, utility…”. This plan is intended to be in effect for fifteen years and forms of recreation in special use areas such as ski areas will evolve in that time and must be considered. |
| Draft Plan | Chapter 2, Special Uses, Desired Conditions | 118 | 18 | The condition should be modified to read: “…experiences of other Forest users **or on developed recreation areas**.” Outfitter/guide activities should not negatively impact Forest picnic areas, trail heads, or trails. |
| Draft Plan | Chapter 2, Special Uses, Guidelines | 119 | Add after 34 | The following guideline should be added: “**Exterior lighting for new special use facilities and their management activities should be designed to direct light where needed and minimize light pollution.**” |
| Draft Plan | Chapter 2, Special Uses, Guidelines | 120 | 13 - 16 | This guideline proposes constraints to minimize the impacts of groundwater pumping on surface water sources. Rather than a guideline, this should be a standard for all special uses pumping groundwater. |
| Draft Plan | Chapter 2, Special Uses, Guidelines | 120 | 21 thru 34 | These guidelines should be listed as standards to assure protection of water resources in a desert environment and the effects of effluent from the point of use. |
| Draft Plan | Chapter 2, Special Uses, Guidelines | 120 | 30 | This guideline should be amended. The activities listed are NOT **Forest Service** activities but those of Special Uses, whether recreational or non-recreational. Replace “Forest Service” with “**Special Use**”. The Forest Service just administers the land and associated groundwater impacted by the special uses. |
| Draft Plan | Chapter 2, Special Uses, Guidelines | 120 | 20 thru 34 | These guidelines state activities with the potential to impact surface or groundwater quality should not be located in source water protection areas. The guideline also should address those activities, including recreational such as ski areas or lodges already located in the Forest. Effluent from these existing special use activities could impact Forest water resources or the drinking water supply of communities recharged by the watershed. The plan must address both growth potential and decommissioning of existing recreational and non-recreational activities to prevent water resource contamination. |
| Draft Plan | Chapter 2, Infrastructure, Roads, Guidelines | 123 | 14 | Modify the guideline as follows: “New road construction or reconstruction should avoid meadows, …, areas of heritage concern, **and proximity to private property,** where feasible.” |
| Draft Plan | Chapter 2, Infrastructure, Roads, Guidelines | 123 | Add after Line 19 | Another guideline is needed to provide features during road modifications or new road construction to allow the Forest Service to quickly close the road to public access in response to an emergency, wildfire, natural disaster, or during extreme drought conditions. |
| Draft Plan | Chapter 3, Management Areas & Designated Areas, Management Areas | 127 | 22 - 24 | This is a critical section and should have been developed earlier before including proposed management areas in the alternatives listed. Guidance provided here could have minimized management area proposals with components already addressed and administered by the Forest Service. |
| GDraft Plan | Chapter 3, Management Areas & Designated Areas, Department of Defense, KAFB Withdrawal | 140 | 9 | Edit: remove the “and” after Department of Energy. |
| Draft Plan | Appendix C: Plan Revision Core Themes | 171 |  | Modify the section “Managing for Sustainable Recreation” by adding: “…a recreation program that is **flexible,** resilient, and relevant…” |
| Draft Plan | Appendix D, Description of Alternatives, Alternative B, Sandia Ranger District | 181 | Add after 10 | In the interest of protecting watershed areas for dependent local communities, the following MA should be added:  “**Madera Canyon MA-**   1. **Monitoring of Sandia Peak Ski Area water treatment system to prevent watershed pollution from lack of maintenance or potential failure due to extreme precipitation events.** 2. **Analysis of any expansion of the Sandia Peak Ski Area special use activities which could increase the rate of effluent being treated by the system.**   The ski area water treatment system is located in Madera Canyon, directly above the community of La Madera which is dependent on groundwater from this watershed. Conservation of groundwater resources which will reduce effluent production such as low flow fixtures or appliances and recycling should be required as a condition for expanding special use area activities. |
| Draft Plan | Appendix D, Description of Alternatives, Alternative B, Sandia Ranger District | 181 | 12 | The need for this component is unclear. Outdoor education and recreation should be encouraged in all the different Forest ecosystems and not restricted within specific geographic boundaries. For example, the western slopes of the Sandia mountains have very different features (flora, fauna, and terrain) from areas on the eastern, southern, and northern slopes. Promoting this component is already detailed in other sections of the draft Forest Plan. |
| Draft Plan | Appendix D, Description of Alternatives, Alternative B, Sandia Ranger District | 181 | 11 - 19 | The “East Mountain Outdoor Education/Recreation MA” as defined does not have a clear, substantive, or justifiable basis. While some of the components listed are worthy activities, the education, recreation, and interpretation activities should be applicable anywhere in the National Forest rather than being restricted by specific geographical boundaries. The forest in the Sandia Ranger district has many different ecosystems depending on altitude and exposure with widely varying flora and fauna. In addition, there is considerable wildland-urban interface with the Albuquerque metropolitan area.These activities could be enhanced by taking full advantage of the Forest diversity. The Alternative B map defines boundaries for this draft management area but most of the components could and should be promoted on any forest land in the Sandia Ranger District. Providing the opportunities for these activities is already detailed in this draft Forest Plan. Inclusion of this MA only impairs the flexibility of the Sandia Ranger District in managing the Forest and supporting the requests of public and private organizations. |
| Draft Plan | Appendix D, Description of Alternatives, Alternative B, Sandia Ranger District | 181 | 13 | The intent in listing this component is unclear. From hang-gliding on the western slopes to skiing or hiking on the eastern side, to motorized recreation in the Manzanitas, the Sandia Ranger District must manage special uses throughout their jurisdiction. Rather than emphasizing the land, the component may be better defined as supporting diverse education and recreation opportunities while sustaining Forest resources. Provisions for promoting this component are already included in the draft Forest Plan. |
| Draft Plan | Appendix D, Description of Alternatives, Alternative B, Sandia Ranger District | 181 | 14, 15 | This component is very important and worthwhile but again should not be bounded by a specific geographic area. The USFS should foster and facilitate these opportunities within the bounds of their operational constraints throughout the entire Forest while preserving and protecting Forest resources. Promoting these opportunities is already detailed elsewhere in the draft Forest Plan. |
| Draft Plan | Appendix D, Description of Alternatives, Alternative B, Sandia Ranger District | 181 | 16, 17 | This component is poorly defined and appears to repeat the component stated in Lines 14 and 15. The value added is unclear. |
| Draft Plan | Appendix D, Description of Alternatives, Alternative B, Sandia Ranger District | 181 | 18, 19 | This component does not justify or support a management area in the Forest as stated. While the USFS can, has, and will foster education and recreational opportunities to the extent possible, private organizations must develop and manage these programs within USFS guidelines. This component does not add value. |
| Draft Plan | Appendix D, Description of Alternatives, Alternative B, Recommended Wilderness | 181 | 24 - 31 | Recommending additional areas for wilderness serves to exclude handicapped persons, including many disabled veterans whose mobility depends on wheeled access, whether by wheelchair, hand-cycle, or other non-motorized device. Making the areas wilderness can impact existing trails currently allowing wheeled access, whether cycling or motorized. These areas are better defined as management areas where hunting, mining, timber-harvesting, or other commercial development are not permitted rather than as wilderness. |
| Draft Plan | Appendix D, Description of Alternatives, Alternatives D and E, Sandia Ranger District | 183, 185 | 31 - 37  24 - 30 | The specified management areas allowing communal grazing are inappropriate for Forest lands adjacent to a growing metropolitan area and expanding rural communities. While this component supports traditional use of the land, the increasing population surrounding the Sandia Ranger District with corresponding pressure on recreation would create conflicts with livestock. The relatively small areas also could sustain damage to flora and fauna from livestock raising sustainability concerns. |
| Draft Plan | Appendix D, Description of Alternatives, Alternative D, Sandia Ranger District | 184 | 9, 10 | The recommended wilderness area D5\_ADJ9 west of Canon de Carnuel is not an appropriate choice for recommended wilderness. Proximity to the high volume of traffic on I-40 and private property degrade the wilderness characteristics in the area. The area is described as a “northern buffer” but instead should be managed as National Forest acting as a necessary buffer between private property and the wilderness. This area currently allows and should continue to allow local residents the opportunity for wheeled recreation, including those with handicaps requiring wheeled methods of conveyance. |
| Draft Plan | Appendix D, Description of Alternatives, Alternative E, Sandia Ranger District | 186 | 35 - 37 | The recommended wilderness areas D5\_ADJ9 west of Canon de Carnuel and D5\_ADJ4 east of 10k Trail and north of Las Huertas Canyon are not appropriate choices for recommended wilderness. Area D5\_ADJ9 is discussed above. D5\_ADJ4 should be managed as other Forest areas outside of the wilderness. Proximity to the 10k North Trail and Ellis Trail, currently open to wheeled, non-motorized means of conveyance, including those of handicapped users, make this area a potential location for a connector trail down to Sandia Man Cave. Providing for future sustainable trail network improvements for public access and recreation should be an important component of the Forest Plan. Most of the Sandia Mountains are already designated as wilderness with trails (many poorly designed and unsustainable) that cannot be used by mountain bikers or the handicapped in wheeled conveyances, either wheelchairs or hand cycles. With the considerable wildland-urban interface in the Albuquerque metropolitan area, these non-wilderness buffer areas are needed to promote recreational activities not currently allowed in the Sandia Mountain Wilderness. |
| Draft Plan | Appendix E, Proposed Management Areas and Draft Alternatives Mapping, Sandia Ranger District | 188 | See SRD map | The Outdoor Education/Recreation management area defined on the Alternative B map is in close proximity to relatively densely populated private land and includes well-travelled roads, a ski area, USFS facilities, and communications towers. The special designation could reduce the ability of the USFS to adopt flexible management practices for the area. For example, the area should remain open to routine mechanized Forest thinning as needed to reduce the potential for wildfire, improve Forest health, and provide a wildland-urban interface buffer between private land, public resources, and wilderness. |
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7/25/2016