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Ms. Elaine Kohrman, Forest Supervisor
Cibola National Forest and Grasslands
2113 Osuna Rd. NE
Albuquerque, NM 87113

RE: Comments on Cibola National Forest's Preliminary Draft Land & Resource Management Plan

Dear Ms. Kohrman:

Please accept the following comments from the New Mexico Wildlife Federation (NMWF) on Cibola National Forest's Preliminary Draft Land & Resource Management Plan. In this document we offer our review and recommendations for how we may approach collaborative solutions to problem areas identified in the Draft Plan.

For over 100 years, NMWF has stood as the voice for New Mexico's sporting community. More than 80,000 strong, NMWF is guided by the North American Model of Wildlife Management, science, and striving to find solution-oriented collaboration. We have been able to bring diverse communities together to work for the benefit of sportsmen and wildlife. We routinely work on issues of access, habitat, and opportunity for New Mexico's citizens on our beloved public lands.

General Comments

NMWF shares the vision of the Forest Service that the Cibola National Forest (CNF) be collaboratively managed in a sustainable way to promote ecological and socioeconomic health and the continued historical and contemporary multiple uses including domestic water resources, grazing, hunting, recreation, and use of forest products.

However, NMWF cautions that only honest, good-faith, collaboration should be tolerated. NMWF agrees that "[t]he land is a common thread that binds all people. Our mountain landscapes are a life-sustaining resources and they help us form individual and community relationships, provide for continuity of cultural identity, and strengthen ancestral connections." This statement is true not only of those communities situated near or adjacent to the CNF but of all New Mexicans and indeed all Americans. Public lands are an important part of our national heritage. Therefore, we urge the Forest Service to temper the input of the local community with the understanding that these lands belong to all New Mexicans, and all Americans, not just those that live in the shadow of the peaks. (p. 84 L36-40)

Specific Comments

UNQUALIFIED SUPPORT:

Forest-wide Plan Components

New Mexico Wildlife Federation supports a number of the provisions found in the Preliminary Draft Land & Resource Management Plan. Specifically, NMWF supports:

- Prioritizing treatment of riparian areas that are important to wildlife, in the wildland-urban interface, along with concern level 1 and 2 travel ways, recreation sites, and in historic openings
- Coordination with the New Mexico Department of Game and Fish on the management of native species within the designated wilderness areas to maintain wilderness character during project implementation
- Protection of surface waters through land acquisition where the economic and social benefits are in the interest of the public
- Collaboration with New Mexico Department of Game and Fish to resolve conflicts that may exist between the management of non-native sport fish and the persistence of native fish
- Exploring reintroduction of native fish assemblages to appropriate perennial stream reaches including Las Huertas Creek
- NMWF supports the proposition that wildlife management should take into account critical corridors and recognize that wildlife is not bound by the lines of the forest. Therefore, NMWF seeks strong provisions for the maintenance of wildlife corridors, but supports the Forest Service on the following points:
 - Spatially disjunct nature of four districts influences the movement patterns of wide-ranging mammal herds such as elk, mule deer, black bear, wild turkey, cougar, and pronghorn
 - Adequate habitat connectivity is also crucial to daily and seasonal movements, finding mates, and being able to utilize available habitat across the landscape
- Recreation planning strategies that “develop relationships with local communities, volunteers, other government agencies, cooperators, and permit holders to help co-manage a sustainable recreation program.”

Management & Designated Areas

- Inventoried roadless areas are managed to protect and conserve their roadless character consistent with the 2001 Roadless Area Conservation Rule

QUALIFIED SUPPORT

Forest-wide Plan Components

NMWF supports the Forest Service on the following items, but offers additional items that must be considered when making management decisions

- Adjust timing, intensity, and frequency of livestock grazing to respond to changing resource conditions and needs of livestock permittees. (p. 82 line 24-26)

- While NMWF does not want any permittee to lose their ability to graze cattle on public lands, we strongly believe that livestock grazing should also be managed based on ecosystem health for ALL grazing animals. On the ground conditions should be able to support both domestic and wild grazing animals.
- Areas for mineral materials sales should be planned, cleared, and made available if compatible with other resource concerns (p. 98 line 17-19)
 - NMWF urges the Forest Service to pay special attention to critical wildlife habitat and important wildlife migration corridors when planning, clearing, and making mineral material sites available.
- Locatable mineral operations should accommodate desired conditions of other resources as far as possible (p. 102 line 12-13)
 - NMWF believes that the Forest Service must take a stronger position on the issue of mine site reclamation. Making this statement a “shall” would be a step in the right direction. An affirmative statement to requiring full reclamation of mine sites would be desirable.

Management and Designated Areas

- NMWF strongly supports the designation of a Bighorn sheep management district within the Mountainair Ranger District. Such an area would allow for habitat work that would ensure the viability of the area’s Bighorn sheep population—an iconic Western species. Therefore, NMWF opposes the establishment of a communal grazing area on the Gross Kelley Allotment. Enforcement of a “no domestic sheep” prohibition would be extremely difficult without fencing and, therefore, the health and well-being of the adjacent Bighorn Sheep population would be put at risk.
- NMWF also strongly supports the establishment of Backcountry Conservation Areas within the Magdalena Ranger District. To make ensure the viability of these Backcountry Conservation Areas, NMWF supports the establishment of new wilderness areas and wilderness management areas to support the Backcountry Conservation Area ecosystem.
- NMWF would like to make special note of the benefit of Special Management Areas (SMAs) to the protection of critical wildlife habitat. Therefore, NMWF encourages the Cibola National Forest, and indeed the entire Forest Service, to work closely with the New Mexico Department of Game and Fish to identify critical wildlife and critical wildlife habitat. This cooperation between state and federal agencies should lead to the creation of game refuges on Forest Service land that would be closed to off-road (OHV) traffic.

Conclusion

New Mexico Wildlife Federation is committed to protecting and restoring unique wildlife and habitat values within the Cibola National Forest. We appreciate this opportunity to participate in the forest plan revision process and look forward to working collaboratively with the Forest Service and affected local communities on the issues discussed above. We believe in the importance of achieving ecologically sustainable, fiscally responsible, and enforceable management of forest resource now and into the future.

Finally, we respectfully ask that you consider New Mexico Wildlife Federation for inclusion in the yet to be established 5th Cibola National Forest landscape team.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'Todd Leahy', with a long horizontal flourish extending to the right.

Todd Leahy, Deputy Director
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