

# **Comments on Phase 3 of the Cibola National Forest “Potential Wilderness Inventory and Evaluation Process”**

## **Bear Mountains, Magdalena Ranger District**

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## Executive Summary

The Bear Mountains are one of the most remote and rugged ranges in New Mexico. Though relatively small, they are home to elk, bear, deer, and mountain lions. The high-desert landscape is lush with native grasses and shrubs. I have spent weeks wandering through the hills and canyons without encountering another human. Moreover, the few roads that circle the mountains are untraveled and vehicles are rare. Most of the Bears are in the Scott Mesa Inventoried Roadless Area; and the Sierra Ladrones Wilderness Study Area lies along the eastern boundary.

These facts make the Bears a strong candidate for wilderness consideration. However, in the Phase 3 “Potential Wilderness Inventory and Evaluation Process” the Interdisciplinary Team (IDT) found that no part of the Bear Mountains met the criteria for wilderness and recommended against taking this area into the next phase of analysis. Based on my own field work and experience of the area I am both surprised and dismayed by this assessment.

A careful reading of the “Potential Wilderness Inventory and Evaluation Process” reveals many problems. Most significantly:

- **The use of illogically-shaped small polygons** as units for evaluation precludes system-wide analysis and magnifies detracting issues.
- The evaluation team appears to **lack knowledge of conditions on the ground** away from roads. They also appear **unaware of the vast amount of information I provided as comments during Phases 1 and 2** that documented healthy and natural ecosystems, minimal human impact away from cherry-stemmed roads, and unparalleled opportunities for solitude throughout the Bears. This evident ignorance casts doubt on the entire report.
- The report has many **misleading and erroneous statements about military training** and its impact on wilderness. It uses military training as a reason to disqualify many areas that have no overlap with the military training zones and it inaccurately describes mechanized traffic as occurring over large areas although military vehicles are restricted to existing roads.
- The evaluation team found that none of the Bear Mountains could be managed to preserve wilderness characteristics and **uninterested in effective management options**. This was the primary cause for disqualifying the entire range. My field work causes me to come to a different conclusion: through effective communication with ranchers the Forest Service could easily manage this area as wilderness, as the majority of grazing related improvements would be on cherry-stemmed roads. Ground based military training would be unaffected, other than a restriction on vehicle traffic in lower Baca Canyon.

Based on my field work and knowledge of the area, I come to very different conclusions about the wilderness characteristics of the Bear Mountains. In this document I provide detailed comments on each of the findings for each polygon and find:

- Polygons D3\_5K6, D3\_5K6.b, D3\_5K6.d, D3\_5K7.c, D3\_5K7.d, D3\_5K7, D3\_5K7.b, D3\_5K7.e and ADJ10 should be rated **HIGH**.
- Because of strange shapes and small sizes, D3\_5K7.c, D3\_5K7.f, 8, and ADJ9 could be rated **MODERATE** although each contains areas that justify a High rating. I also found that D3\_5K5 could be rated Moderate.
- In contrast to the IDT’s ubiquitous Low rating, only D3\_5K6.d warrants a **LOW** rating, and that is because of its artificially small size.

As next steps, I recommend

- Include the Bear Mountains and areas east of 354 adjacent to the BLM WSA in the Phase 3 analysis. This will give the Forest Service time to correct some of its errors, conduct fieldwork to justify its assertions, and reconsider management approaches.
- Redraw the polygons to allow more systems-level analysis. If smaller polygons are deemed necessary, at least one polygon should contain the heart of the Bear Mountains, and avoid overlapping with existing or proposed military training zones and I’ve provided one example that meets this criterion in Figure 5.

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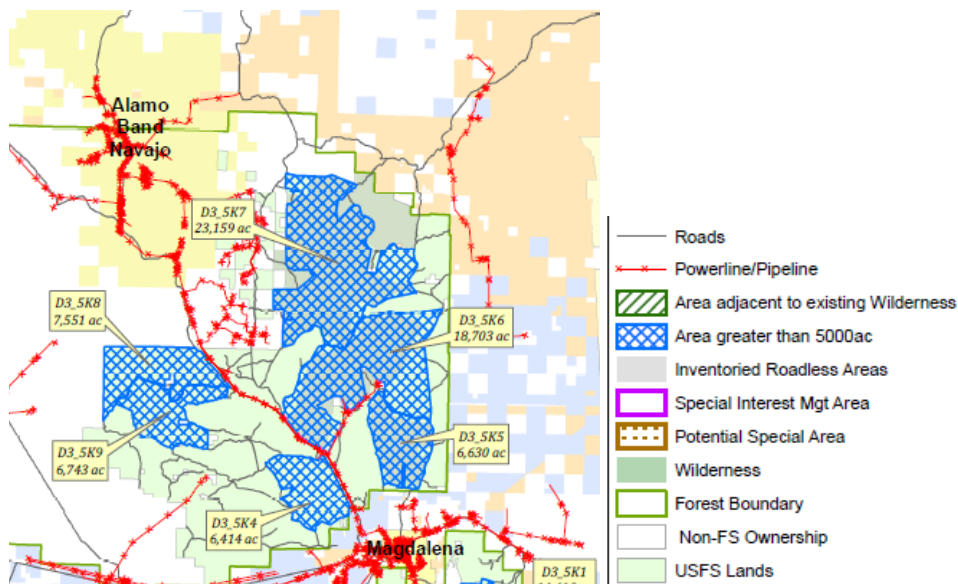
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## Background on Phase 1 and Phase 2

### Phase 1: Identification and Inventory Phase

The Forest Service Identification and Inventory Phase (Phase 1) for wilderness in the Bear Mountains of the Magdalena Ranger District resulted in a map showing areas considered to have potential for wilderness (blue cross-hatched area in map below). This is also available at:

[http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprd3816212.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3816212.pdf).



**Figure 1. Phase 1 Mountain Units Wilderness Inventory**

I submitted my response to Phase 1 on November 19, 2014. It included photos taken during more than a month of intensive field work between May and July 2014 documenting wilderness characteristics and human impacts throughout the Bear Mountains. Excepting one relatively small area in the southwest (the area between 169 and 506, south of the road designated as 24CA\*B), I concluded that the evidence supported including of all of the land identified by the forest service in D3\_5K5, D3\_5K6, and D3\_5K7 as wilderness.

I also provided photos and comments supporting the inclusion of two additional areas as wilderness:

- 1) The area at the northeast bounded by CR12A - CR12B - CR12C on the west, 354E to the south, 354 to the east, and the Forest Service Boundary to the north; and
- 2) The area east of 354 bounded by the BLM WSA on the east, and 354O to the south; with cherry stems for the first mile of 354XA going down Baca Canyon and 354Q going to my property, which would be an inholding. I provided reasons for including the less than 5000 acres west of the powerline as part of the wilderness.

## Phase 2: Evaluation Phase

The Forest Service provided a revised map “[Phase 2 Inventory Results for Lands that may be Suitable for Wilderness](#),” as shown below. Regarding the Bears, it was very encouraging to see that nearly 26,300 acres were identified as potential wilderness in polygons D3\_5K7, D3\_5K6, D3\_5K5, D3\_ADJ9, and D3\_ADJ10. These are the areas shown in blue on the map.

However, important areas were excluded in D3\_5K7 and D3\_5K6. Moreover, the two key areas mentioned above continue to be left out: 1) the NE corner west 354 and the area east of 354 but west of the powerline and north of 3540.

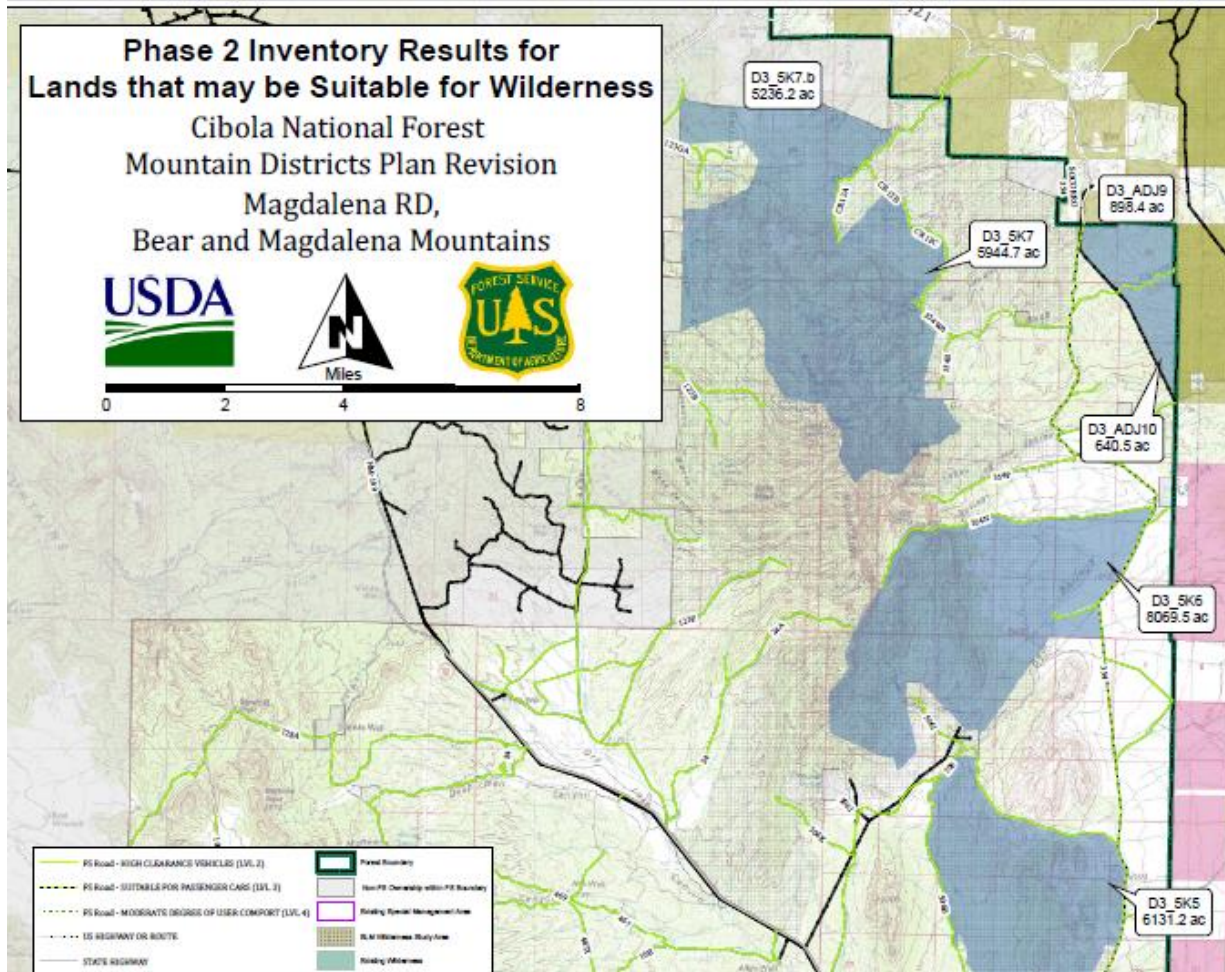


Figure 2. Phase 2 Inventory Results



### **Fieldwork Challenged the Accuracy of the Forest Service Evaluation**

In an effort to understand why these areas were excluded and to assess the Forest Service's identification of "Substantially Noticeable Features," I returned to the field in September 2015 to observe and document these features.

Based on the results of my fieldwork, I disagreed with most of the Forest Service's assertions that fences and other features constitute "substantially noticeable features" sufficient to disqualify these lands as wilderness according to the Forest Service's criteria. I also found numerous instances in which the locations of SNFs as provided by the Forest Service are significantly inaccurate. In comments submitted September 23, 2015 I provided data demonstrating that:

- The vast majority of fences in the Bear Mountains and environs are wood post rather than steel.
- Vegetation and rugged topography through most of the area is sufficient to screen fences and other human developments from view from most vantage points.
- Most stock tanks and other developments are located on roads that were cherry-stemmed in the Phase 1 Inventory, and therefore do not contribute to the deletion of land during Phase 2.
- The data provided by the Forest Service regarding the locations of "substantially noticeable" fences and other developments are often inaccurate by up to 0.75 mile.

These discrepancies lead me to conclude that the Forest Service did not perform an on-the-ground assessment of all of these features, which begs the question of how this information was obtained. Not only do these inaccuracies impede independent evaluation, they also cast doubt on the credibility of other information provided to the public by the Forest Service.

### **Summary of Conclusions and Recommendations of Phase 2 Fieldwork**

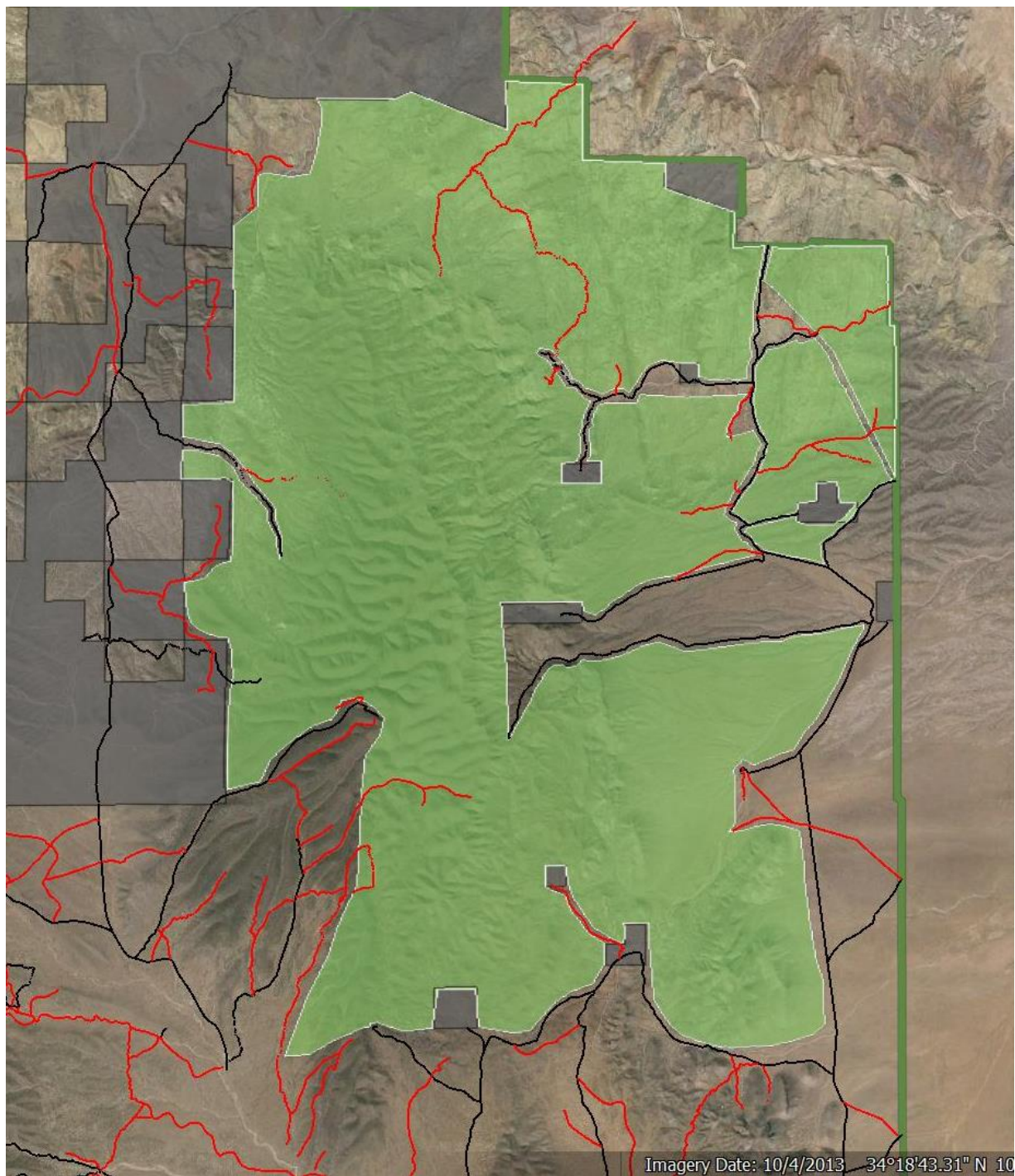
With the exception of land in the southwest corner of Polygon D3\_5K6, I concluded that fences and other developments disqualify no land in D3\_5K6 and D3\_5K7 from wilderness consideration.

Moreover, there were no features disqualifying land in the NE corner west of 354 and this should be added to Polygon D3\_5K7.

In addition, I strongly recommended including a significant area east of 354 and west of the powerline in the next phase of evaluation. Despite its falling below 5,000 acres, it meets other requirements for wilderness and its adjacency to other wilderness would ease any management concerns.

A map showing the area north of 506 that I proposed taking into the Phase 3 Analysis is presented on the next page.

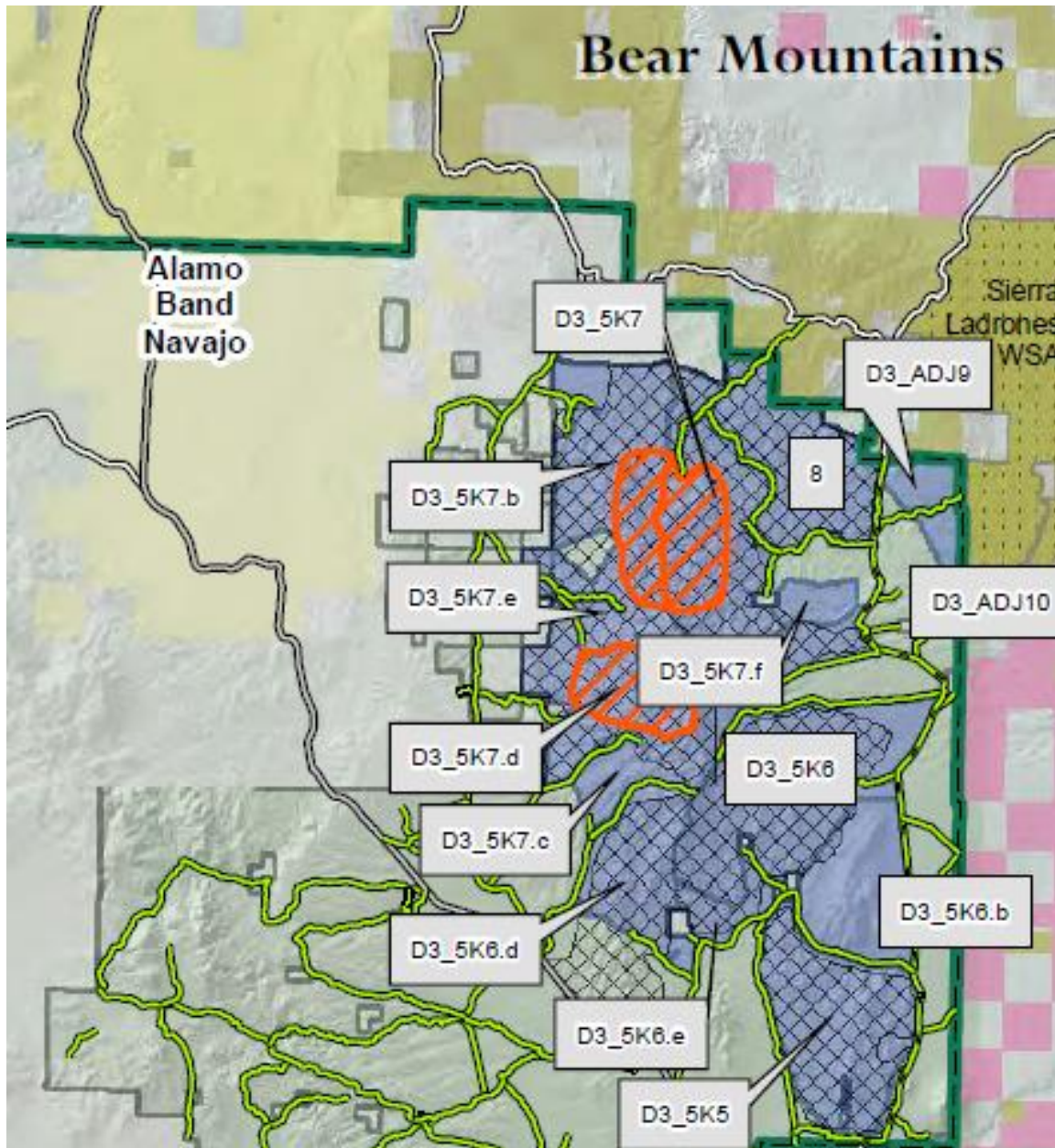




**Figure 3.** Proposed Bear Mountain Wilderness for the Area North of 506 in comments submitted September 2016

### Phase 3: Wilderness Inventory and Analysis

The Forest Service has now provided a revised map, [“Phase 3 Wilderness Inventory & Areas with Wilderness Character”](#) for the Magdalena Ranger District. This map, and associated evaluation, provides the basis for analyzing alternatives for wilderness in an Environmental Impact Study that will come next. The portion of the map dealing with the Bear Mountains is shown in Figure 4. For unknown reasons, Polygons D3\_5K6 and D3\_5K7 have been divided into numerous smaller polygons. A new area (as I recommended in my Phase 1 Phase 2 comments), identified as Polygon 8, has been added to those being evaluated.



**Figure 4.** Phase 3 Map for the Bear Mountains



## **Evaluation Criteria and Results**

Each of these new polygons was evaluated by an interdisciplinary team (IDT) based on several criteria in a document referred to as the Evaluation Matrix. The criteria of highest significance to consideration as potential wilderness are:

1. Apparent naturalness
  - a. Composition of plant and animal communities
  - b. Naturalness of ecological conditions
  - c. Extent to which “improvements” in area represent a departure from naturalness
2. Outstanding opportunities for solitude and primitive recreation
  - a. Impacts that influence opportunities for solitude
  - b. Opportunities for primitive recreation
5. Management
  - a. Can the area be managed to preserve its wilderness characteristics

The IDT found that none of the polygons in the Bear Mountains met the criteria for wilderness and recommended dropping this entire mountain range from further consideration. A link to the full report is here:

[http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd510437.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd510437.pdf).

## **Forest Service Evaluation Is Inaccurate and Misleading**

The report provides little or no evidence to justify its assertions and contains much misleading and inaccurate information. I will provide detailed comments on all of the findings in the following pages, but note some general and pervasive issues here.

### **Illogically Shaped and Small Polygons**

The new polygons do not represent natural geographical areas or any logical analysis units. Furthermore they are analyzed as “stand alone” units and alternative boundaries are never mentioned. This makes no sense in an area as small as the Bears. This raises the question of whether they were chosen so that each had some disqualifying feature, whose impact would be magnified in the smaller unit. I provide an example of a polygon that contains the heart of the Bear Mountains and overlaps none of the existing or proposed military training activities in Figure 5.

### **Ignorance of Field Conditions and Disregard for Previous Documentation**

There is no indication that any field work was done to justify statements about composition of species, location and condition of human impacts, location and status of mining claims, or opportunities for solitude. I have done extensive field work in the area documenting human impacts associated with every road (especially those to be decommissioned) and every fence-line. Based on this field work, I presented evidence that human impacts throughout the area I proposed as wilderness in Figure 3 are minimal and should not detract from wilderness consideration. In addition, I documented healthy and natural ecosystems. Based on my experience during the weeks of field work and as a frequent recreational visitor I also provided evidence that the Bear Mountains offer unparalleled opportunities for solitude and primitive recreation. In fact, throughout all this time I never encountered another human being while on foot. I met an average of one vehicle per day while driving on 354, 123, 506, and CR12. The IDT makes no reference to any of this work, although it was all provided as comments to the Forest Service during Phases 1 and 2.

### **Misleading and Erroneous Statements about Military Training**

I have been a significant voice in the effort to limit military training in the Bear Mountains and have a thorough understanding of existing and proposed activities. It is worth noting that the polygons are drawn so that most

have some overlap with areas where military training occurs. Of course, there are other ways to draw the polygons to prevent this, but that is not mentioned.

A map of existing and proposed military training is shown in Figure 6 for reference. It map shows all existing routes, helicopter landing zones, and ground-training areas. Note that military vehicles are restricted to 354, 354N, 354P, 566, and a few other tracks near Baca Canyon. Ground-based training occurs approximately five times per year and lasts for one week or less. Foot traffic is allowed throughout the tactical training area and on other routes during ground-based training, but vehicles are restricted to existing roads. There is one existing helicopter landing zone (HLZ -26) which is on 354N, which would not be in any proposed wilderness. The establishment of three new HLZs has been proposed and is under review. However, if approved, they would not impact the proposed wilderness area: the proposed new HLZ-X would be adjacent to 354 and would be in a buffer zone associated with this county road. The proposed HLZ-Y would be outside the boundaries of any proposed wilderness. The proposed HLZ-Z would be near the bottom of the polygon D3\_5K5 outside the inventoried roadless area, and would fall outside any proposed wilderness.

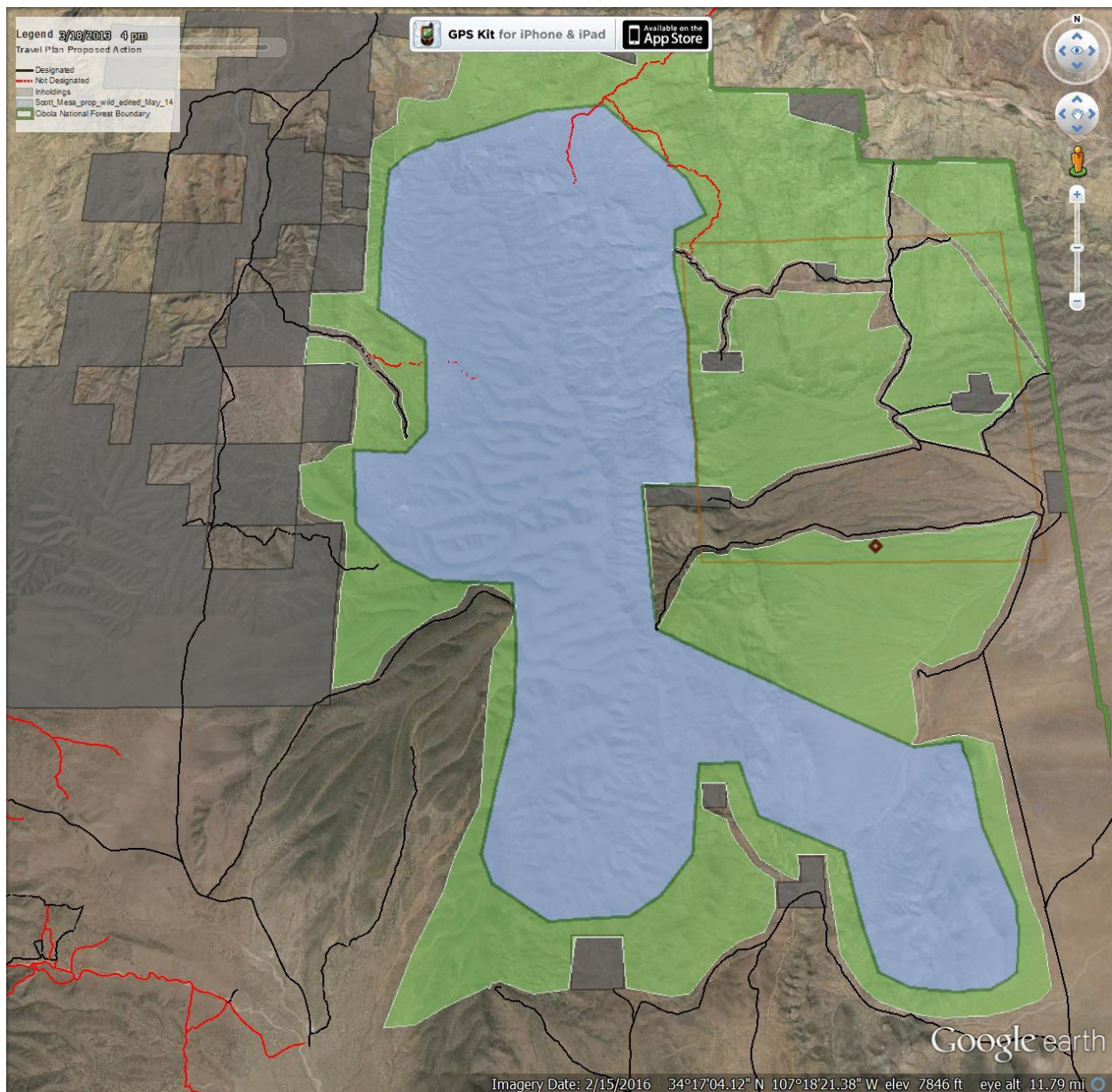
In their evaluation, the IDT lists military training as a reason to disqualify almost every polygon under consideration. However, almost every statement about military activity is erroneous. Examples include:

- “D3\_5K6.b receives a **Low** finding, due to presence of human activities being unavoidable within the area in proportion to its size (military training and road noise).” ***In fact, D3\_5K6.b lies completely outside the area of ground-based training and is about 5 miles from the Helicopter Landing Zone (HLZ-26). The same is true for DK\_5K7.f)***
- “D3\_5K6: The active permit for military training currently in the area uses mechanized transport in majority portion of the area.” ***In fact, D3\_5K6 has no roads authorized for military vehicles, as it lies below 354N, which is the route to HLZ-26). This same misstatement also is made elsewhere.***

### **Disinterest in Wilderness Management**

The IDT found that none of the areas of the Bear Mountains could be managed to preserve wilderness characteristics, and this was the primary cause for disqualifying the entire range. The reasons most often cited are ongoing rangeland management and military training. My field work showed that with only one or two exceptions maintenance of active stock tanks and other range management could be accomplished using a few existing cherry-stemmed roads. Fences away from roads are accessible on horseback or on foot (in fact, many are only accessible this way). In addition, many fences in the high country fell down decades ago and are no longer in use.

Through effective communication with ranchers and the willingness to prevent off-road driving, the Forest Service could easily manage the entire area shown in my proposal in Figure 3 as wilderness. Ground based military training would be unaffected, other than a restriction on vehicle traffic in lower Baca Canyon. I’m surprised that such methods are not even mentioned as options by the IDT.



**Figure 5. Example of a logically drawn polygon for analysis.** The Blue Polygon, overlain on my original proposal for the Bear Mountain Wilderness shown in green, is an example of an area that contains the heart of the Bear Mountains, contains essentially no human impacts, and does not overlap military training areas. Why did the evaluation team not consider such a polygon?

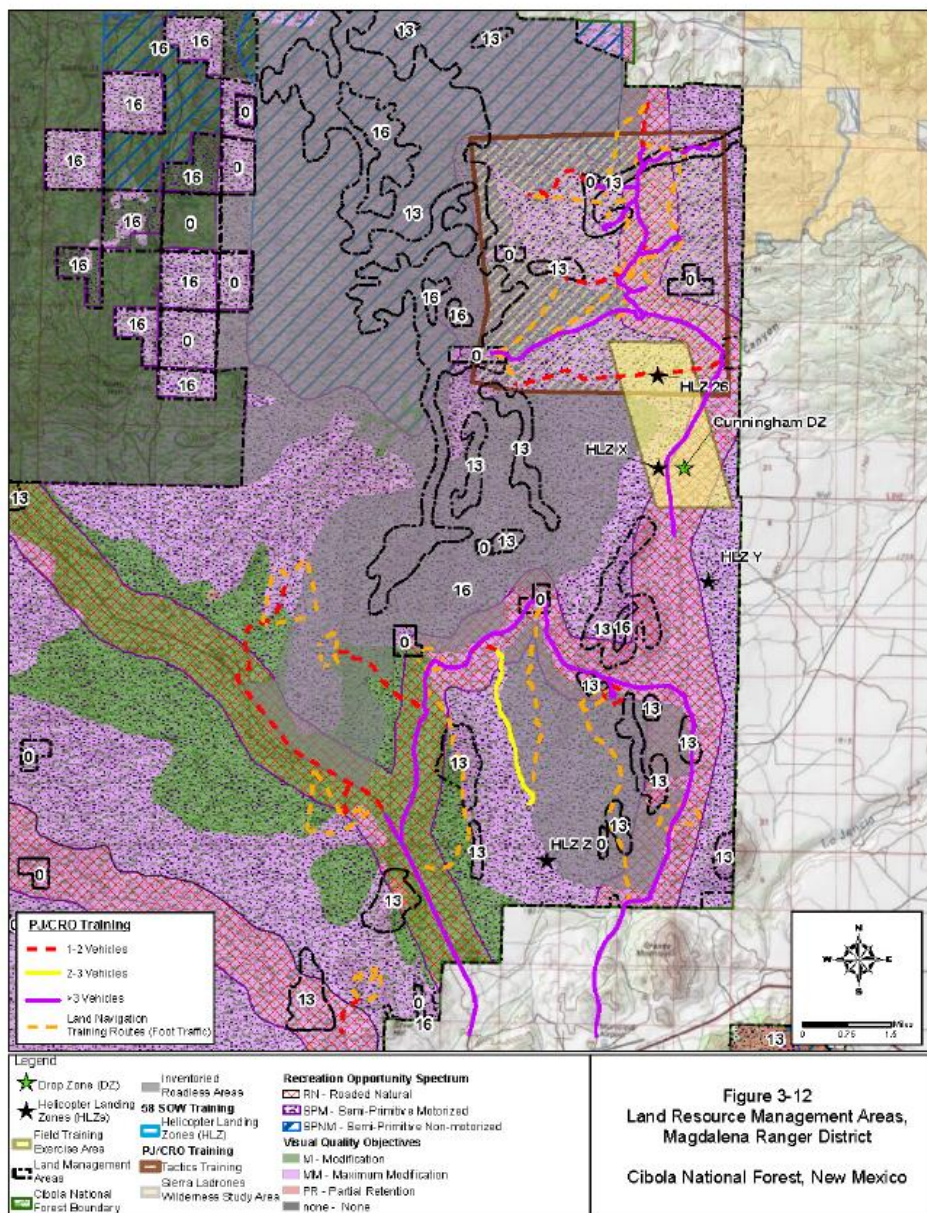


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Environmental Assessment  
Affected Environment

Military Training Exercises within the Cibola  
National Forest near Kirtland Air Force Base, New Mexico

1  
2



July 2013

3-84

Figure 6. Military Training Areas in the Bear Mountains.

## Summary of Comments and Recommendations

Table 1 provides detailed comments on the overall finding for each of the polygons assessed by the IDT and the following Tables provide comments on each of the findings for individual polygons along with photo documentation.

To summarize my findings:

- Based on my field work I find that D3\_5K6, D3\_5K6.b, D3\_5K6.d, D3\_5K7.c, D3\_5K7.d, D3\_5K7, D3\_5K7.b, D3\_5K7.e and ADJ10 should be rated **HIGH**.
- Because of strange shapes and small sizes, I find that D3\_5K7.c, D3\_5K7.f, 8, and ADJ9 could be rated **MODERATE** although each contains areas that justify a High rating. I also found that D3\_5K5 could be rated Moderate.
- In contrast to the IDT's ubiquitous Low rating, I find that only D3\_5K6.d warrants a **LOW** rating, and that is because of its artificially small size.

As next steps, I recommend

- Including the Bear Mountains and areas east of 354 adjacent to the BLM WSA in the Phase 3 analysis. This will give the Forest Service time to correct some of its errors, conduct fieldwork to justify its assertions, and reconsider management approaches.
- Redraw the polygons to allow more systems-level analysis. If smaller polygons are deemed necessary, at least one polygon should contain the heart of the Bear Mountains, and avoid overlapping with existing or proposed military training zones and I've provided one example that meets this criterion in Figure 5.

**Table 1. Comments on Overall Findings**

Polygon	USFS Finding	Pregenzer Finding	Comments
D3_5K6	Low	High	<p>The FS finding of Low is based on considerations of "(...active mining claims and military training); presence and extent of other uses occurs across most of the area and makes management to preserve the area's wilderness characteristics low in most areas." <b>I strongly disagree for the following reasons:</b></p> <ol style="list-style-type: none"> <li>Existing mining claims are inactive, at the end of 354N and can easily be excluded from land proposed as wilderness;</li> <li><b>There is no current or proposed military training in the area except for a small area along 354N. The Helicopter Landing Zone (HLZ-26) is also along 354N.</b></li> <li>The only other use of the area is for cattle grazing</li> <li>Furthermore the plants and ecology of the area are substantially natural (as shown in Figure 7, Figure 8, Figure 9, and Figure 10).</li> </ol> <p>This large area easily meets all criteria for wilderness with flying colors, provided 354N and 354L are cherry-stemmed out.</p>
D3_5K5.b	Low	High	<p>The overall decision to rate this area as <b>Low</b>, cites military training and failure to meet standards of individual criteria. Based on my fieldwork, I disagree:</p> <ol style="list-style-type: none"> <li><b>As shown in Figure 6, there is no current or proposed military training within D3_5K6.b.</b></li> <li>Maintenance of guzzlers and tanks can be accomplished through existing access via 354L – which would be cherry-stemmed out. No other "improvements" exist in the area.</li> <li>The area is ecologically healthy and vegetation is natural as shown in Figure 12, Figure 13, and Figure 14.</li> <li>Opportunities for solitude and primitive recreation are very good.</li> </ol>

... Continued on following pages



Polygon	USFS Finding	Pregenzer Finding	Comments
D3_5K6.d	Low	High	<p>The FS finding of Low is based on an unjustified assessment that it would be difficult to manage this area as wilderness due to mining claims and grazing activities. I strongly disagree for the following reasons:</p> <ol style="list-style-type: none"> <li>1. In many days of hiking in this area (up every road, track, and along every fence) I have never encountered any evidence of mining activity.</li> <li>2. Improvements related to grazing are restricted to near roads (especially 24) and private property and would lie within surrounding buffer zones.</li> <li>3. The area is rated high or moderate on all other required criteria.</li> </ol> <p>The Low rating is baffling to me. The area meets all requirements for wilderness!</p>
D3_5K6.e	Low	Low	<p>The low rating is due to the small size of this area. I'm not sure why the Forest Service defined it in this way. I'd suggest redrawing the boundaries of D3_5K6.b and D3_5K6.d to come closer to the private property and 566, and then eliminating this area from consideration as it is essentially a buffer zone.</p>
D3_5K7.c	Low	Moderate	<p>The Low ratings by the FS on individual criteria may be true for the lower stretches of the area, but not for the upper portions. I would agree that some the area is not suitable, but not all. The boundaries could easily be redrawn to reflect this.</p>
D3_5K7.d	Low	VERY High	<p>I am baffled by and strongly disagree with the overall finding on D3_5K7.d, which represents one of the wildest and most untouched areas of the Bears. The only Low finding on the individual criteria was related to 5.a and the ability to manage as wilderness. Contrary to the FS finding, this would be the easiest area to manage as wilderness as it is inaccessible by any road or track. <b>In addition, the FS erroneously refers to military activities being pervasive in the area, whereas no ground-based military activity is current or planned, as shown in Figure 6.</b> Also refer to Figure 17, Figure 18, Figure 19, and Figure 20.</p>
D3_5K7.f	Low	Moderate	<p>I disagree with the FS finding of Low. Much of the area is contains natural vegetation with no human development. See Figure 21 and Figure 22. The boundaries could easily be redrawn to exclude areas near private property and 354E. Military activity is restricted to foot traffic away from 354 and the base camp, and occurs only 5 times per year. Helicopters landing at HLZ-26 do cause a noise disturbance, but are becoming less frequent. I have seen no evidence of active mining during my field work or hiking, and suggest that the FS provide documentation and coordinates of such activities.</p>
D3_5K7	Low	Very High	<p>The FS has separated D3_5K7 and D3_5K7.b for unknown reasons and hasn't clarified where the boundaries are. This makes it very difficult to comment on these areas separately. I strongly disagree with the FS finding of Low. It is based on undocumented assertions about difficulties in managing this area as wilderness and lack of wilderness characteristics.</p> <ul style="list-style-type: none"> <li>• The FS cites many fences along boundaries that may require motorized vehicle for maintenance, but the fences I documented during many days of field work are inaccessible by motorized vehicles and any maintenance is accomplished on by horseback. There was no evidence of vehicle tracks along fences that might indicate maintenance by ATV.</li> <li>• There is no military training in most of the area as it lies outside the tactical training zone (see Figure 6). Within the tactical training area on the east side of the Bears, military training is un-motorized.</li> <li>• The assertion that most of the area does not possess wilderness characteristics is unsupported by my extensive fieldwork showing natural and lush vegetation, and only isolated human impact.</li> </ul> <p>Contrary to the FS finding, I suggest that this area has strong wilderness characteristics and because of its isolation would be easy to manage as such as long as there was good communication with the grazing permit holder. See Figure 23, Figure 24, Figure 25, and Figure 26).</p>

Polygon	USFS Finding	Pregenger Finding	Comments
D3_5K7.b	Low	High	<p>The FS has separated D3_5K7 and D3_5K7.b for unknown reasons and hasn't clarified where the boundaries are. This makes it very difficult to comment on these areas separately. I strongly disagree with the FS finding of Low. It is based on undocumented assertions about difficulties in managing this area as wilderness and lack of wilderness characteristics.</p> <ul style="list-style-type: none"> <li>The FS cites many fences along boundaries that may require motorized vehicle for maintenance, but the fences I documented during many days of field work are inaccessible by motorized vehicles and any maintenance is accomplished on by horseback. There was no evidence of vehicle tracks along fences that might indicate maintenance by ATV.</li> <li>There is no military training in most of the area as it lies outside the tactical training zone (see Figure 6). Within the tactical training area on the east side of the Bears, military training is nonmotorized.</li> <li>The assertion that most of the area does not possess wilderness characteristics is unsupported by my extensive fieldwork showing natural and lush vegetation, and only isolated human impact.</li> </ul> <p>Contrary to the FS finding, I suggest that this area has strong wilderness characteristics would be easy to manage as such as long as there was good communication with the grazing permit holder.</p>
D3_5K7.e	Low	High	<p>I am baffled by the Low finding on the individual criteria which the FS sites as justification for its low rating. Contrary to this assessment, based on my field work I find:</p> <ul style="list-style-type: none"> <li>Vegetation is natural and healthy over the majority of the area</li> <li>Human impacts are restricted to areas in the upper stretches of 123AB which could easily be cherry-stemmed out.</li> <li>There are fantastic opportunities for solitude and numerous options for primitive recreation (hunting, bird-watching, hiking, etc.).</li> <li>Management as wilderness would be relatively easy due to the inaccessibility of the area, as long as there was good communication with the grazing permit holder.</li> </ul> <p>Refer to Figure 27, Figure 28, Figure 29, and Figure 30.</p>
8	Low	Moderate	<p>The shape of Polygon 8 makes it difficult to rate consistently. Much of the area has outstanding native vegetation, no signs of human development, and great opportunities for solitude. Furthermore much of the area is outside the military's tactical training zone, as shown in Figure 6. The boundaries of this area could be redrawn to minimize the disqualifying features, and certainly deserves more rigorous analysis in Phase 3. See Figure 31, Figure 32, Figure 33, and Figure 34 for examples of rugged and isolated wilderness worthy areas in Polygon 8.</p>
D3_ADJ9	Low	Moderate	<p>This area deserves further consideration in the context of its adjacency to the BLM WSA. Considering it in isolation as done here is unwarranted. In addition, Baca Canyon is home to wonderful cottonwoods and cliffs that provide home to numerous raptors. It is a riparian area worthy of good management. Refer to Figure 35.</p>
D3_ADJ10	Low	High	<p>When considered in conjunction with the BLM WSA, this area should have high priority as potential wilderness. Vegetation is natural and healthy, it possesses many rugged and isolated canyons, and most lies outside the area of military training. I suggest extending this area west beyond the powerline, and around my property, all the way to 354. See Figure 37, Figure 38, Figure 39, and Figure 40.</p>

Polygon	USFS Finding	Pregenzer Finding	Comments
D3_5K5	Low	Moderate	The FS rated this area as <u>Low</u> , based on the possibility of extending the permit military training in the area and adding a new helicopter landing zone (HLZ). However, as shown in <b>Figure 6</b> military training within D3_5K5 is restricted to foot traffic and occurs only five times per year. The proposed new HLZ (which is unlikely to be approved) would be at the very edge of NSFS land and could be excluded from any wilderness proposal. The evaluation team found that the area would be rated “high” on question 5a, if there were to be no military training, and “low” if it were allowed. Since military training in this area is currently restricted to foot traffic during ground-based exercises which occur during very limited times, the finding should be changed to <u>Moderate</u> , and carried into Phase 3 analysis.

## Comments on Each Polygon with Photo Documentation

The tables on the following pages provide detailed comments and photo-documentation for my findings for each of the polygons.

**Table 2. Polygon D3\_5K6**

Polygon D3_5K6			
Question	USFS Finding	Pregenzer Finding	Comments
Overall	Low	High	<p>The FS finding of Low is based on considerations of “(...active mining claims and military training); presence and extent of other uses occurs across most of the area and makes management to preserve the area’s wilderness characteristics low in most areas.” I <b>strongly disagree for the following reasons:</b></p> <ol style="list-style-type: none"> <li>1. Existing mining claims are inactive, at the end of 354N and can easily be excluded from land proposed as wilderness;</li> <li>2. There is no current or proposed military training in the area except for a small area along 354N. The Helicopter Landing Zone (HLZ-26) is also along 354N.</li> <li>3. The only other use of the area is for cattle grazing</li> <li>4. Furthermore the plants and ecology of the area are substantially natural and opportunities for solitude unsurpassed (as shown in Figure 7, Figure 8, Figure 9, Figure 10, and Figure 11).</li> </ol> <p>This large area easily meets all criteria for wilderness with flying colors, provided 354N and 354L are cherry-stemmed out.</p>
1.a	Low	High	<p>The “low” finding by FS is due to supposed concentrations of salt cedar, thistle, and other non-native species in this area. I have hiked in this area many times and have seen no salt cedar. In September 2015 the gramma grass was particularly lush and healthy along arroyos. Perhaps there is salt cedar within the private property, but I even along the border with the private property and near stock-tanks there is very healthy native vegetation. The hills are particularly healthy. See selected photos below. (More than 50 additional photos available). Based on my documentation, and assuming a 50 yard buffer zone around private property, 354, 354L, 354N, and 566, I would rate this area as High.</p>
1.b	None	High	<p>Based on my field work and photo documentation (see photos), I suggest that this area should be rated High (assuming buffers as noted above.)</p>
1.c	High	High	<p>Agree with FS assessment and the need to cherry-stem the road.</p>
2.a	Low	High	<p>The narrative provided by the FS mentions that the ranch headquarters to the south and 354 on the east impact solitude. However, when stating their 2a findings, they don’t cite these reasons, instead referring to “pervasiveness of military training.” However, this area is not used by the military for ground-based training (they use the area much farther north, near Baca Canyon)! The Helicopter Landing Zone is at the end of 354 N, and that road would be cherry-stemmed out, with a wide buffer. This is a very large area, and based on my field work and recreational hiking, the ranch and 354 are not visible from most of the area and noises do not carry because of the varied terrain. I have never encountered another human in the area, despite days of field work and botanizing. In addition, 354 has very little traffic – maybe one vehicle per hour at most. This area has great potential for solitude – and deserves such recognition.</p>
2.b	High	High	<p>I agree!</p>
5.a	Mod-Low	High	<p>The FS states “D3_5K6: The active permit for military training currently in the area uses mechanized transport in majority portion of the area.” <b>This is NOT true.</b> As shown in <b>Figure 6</b>, there is one HLZ along 354N, and military vehicles are allowed only on 354, 354N, and 566. There is not ground-based training in this area except within a small distance of 354N and in any event, it occurs only 5 times each year for 1 week, and is restricted to the “tactical training area” farther north. Therefore, even if the current permit is renewed, this area can be managed as wilderness without impacting existing training. Furthermore, the active mining claims are at the north end of the area, accessed by 354N, which can be cherry stemmed. Although these claims are technically active, nothing has happened in the last 8 years.</p>



**Figure 7.** Polygon D3\_5K6. Healthy vegetation and grass at the south end of D3\_5K6 just north of 566. (34°13'57.66"N; 107°15'28.74"W).



**Figure 8.** Polygon D3\_5K6. Gramma grass covers the hills about ½ north of previous photo. (34°14'25.15"N; 107°15'11.33"W.)





**Figure 9.** Polygon D3\_5K6 – just at the end of 354L. Beautiful grasses: Muhlenburghia, sideoats gramma, Sporobolus, black and blue gramma. Natural screening by vegetation and terrain obscure any sight of fences or other human signs. ( 34°15'28.83"N / 107°14'20.79"W).



**Figure 10.** Polygon D3\_5K6. Looking back at the Magdalena Mountains from a position about 1 mile north of the private property at the southern edge of D3\_5K6. (34°14'13.37"N/ 107°17'59.14"W). Nothing human is visible, and the grasses are amongst the healthiest I've seen.



**Figure 11.** Polygon D3\_5K6. Looking into the area from the highest point of the Bear Mountains. Nothing but healthy gramma grass, mountain mahogany, junipers, and solitude for miles. (34°16'46.97"N, 107°17'53.98"W).



Table 3. Polygon D3\_5K6.b

Polygon D3_5K6.b			
Question	USFS Finding	ALP Suggestion	Comments
Overall	Low	High	<p>The overall decision to rate this area as <u>Low</u>, cites military training and failure to meet standards of individual criteria. Based on my own fieldwork, I strongly disagree for following reasons:</p> <ol style="list-style-type: none"> <li>1. As shown in Figure 6 There is no current or proposed military training within D3_5K6.b.</li> <li>2. Maintenance of guzzlers and tanks can be accomplished through existing access via 354L – which would be cherry-stemmed out. No other “improvements” exist in the area.</li> <li>3. The area is ecologically healthy and vegetation is natural</li> <li>4. Opportunities for solitude and primitive recreation are very good.</li> </ol>
1.a	Moderate	High	The vegetation is very healthy throughout this area, except for small strips adjacent to 354L and 354. To my knowledge, there is no salt cedar in the area, despite FS claims. See Figure 12, Figure 13, and Figure 14 for representative vegetation and terrain.
1.b	None	High	Vegetation appears very natural throughout the area.
1.c	Moderate	High	Improvements are restricted to a small area at the end of 354L – which are not visible from most of the area.
2.a	Low	Moderate	The FS finding of Low cites military training and road noise. However, as shown in Figure 6, <b>there is no current or proposed military training within D3_5K6.b</b> . No road noise is audible from the west side of the area and from its interior. 354 and 566 have very little traffic, in any event.
2.b	High	High	Agree!
5.a	Low	High	FS finding states “Area receives a finding of <u>Low</u> (considering on-going maintenance of range improvements and military training); presence and extent of other uses occurs across most of the area and makes management to preserve the area’s wilderness characteristics low in most areas.” However, <b>there is no current or proposed military training within D3_5K6.b</b> . Also, maintenance of guzzlers and tanks can be accomplished through existing access via 354L – which would be cherry-stemmed out. No other “improvements” exist in the area.



**Figure 12.** Polygon D3\_5K6.b. Looking into the area from 354. Hell's Mesa is in the background. Note the healthy tall gramma and other native grasses. ( $34^{\circ}15'1.12''\text{N}$ ,  $107^{\circ}13'15.50''\text{W}$ ).



**Figure 13.** Polygon D3\_5K6.b The hills at the NE end are essentially untouched, and full of wildflowers and grasses. Even down near 354L, the grasses are healthy and they just get better as you walk into the hills. ( $34^{\circ}15'32.45''\text{N}$ ,  $107^{\circ}13'20.86''\text{W}$ ).



**Figure 14.** Polygon D3\_5K6.b. Looking into the area from the west side. Tall grasses wave in a gentle breeze. Nothing but solitude. (34°14'37.00"N, 107°14'44.90"W).

**Table 4. Polygon D3\_5K6.d**

Polygon D3_5K6.d			
Question	USFS Finding	ALP Suggestion	Comments
Overall	Low	High	<p>The FS finding of Low is based on an unjustified assessment that it would be difficult to manage this area as wilderness due to mining claims and grazing activities. I strongly disagree for the following reasons:</p> <ol style="list-style-type: none"> <li>1. In many days of hiking in this area (up every road, track, and along every fence) I have never encountered any evidence of mining activity.</li> <li>2. Improvements related to grazing are restricted to near roads (especially 24) and private property and would lie within surrounding buffer zones.</li> <li>3. The area is rated high or moderate on all other required criteria.</li> </ol> <p>The Low rating is baffling to me. The area meets all requirements for wilderness!</p>
1.a	High	High	Except for areas near roads and improvements, the vegetation is healthy and natural.
1.b	Moderate	High	Forest service cites fuelwood cutting as the reason for rating this area as Moderate. However, fuelwood cutting is limited to areas adjacent to roads, especially 24, and is essentially irrelevant to the vast extent of this area.
1.c	Moderate	High	Improvements are very limited, near existing or decommissioned roads, and are insignificant in the context of this very large area.
2.a	Moderate	High	This huge area provides very significant opportunities for solitude. I've spent days hiking the ridges and hills and have never encountered a person – even near the private property.
2.b	High	High	Agree.
5.a	Low	High	FS cites active mining claims in this area but provides no documentation or coordinates. I have encountered no evidence of mining activity in the area during many days of hiking up all roads (including decommissioned). Grazing-related maintenance is restricted to areas near 24, which would be cherry-stemmed out. The majority of the area is inaccessible by vehicle. In addition, there is no current or planned military training within D3_5K6, as shown in Figure 6. The area could easily be managed as wilderness by noting road closures. Grazing would not be affected.





**Figure 15.** Polygon D3\_5K6.d. Looking into the Bears from the South. No sign of fences or human activity, despite being less than a half mile from private property. ( $34^{\circ}13'53.12''\text{N}$ ,  $107^{\circ}18'7.09''\text{W}$ ).



**Figure 16.** Polygon D3\_5K6.d. View from the end of 24; June 2013. No sign of human activity just a few feet away from the road stock tank. ( $34^{\circ}14'54.42''\text{N}$ ,  $107^{\circ}19'53.91''\text{W}$ )

**Table 5. Polygon D3\_5K6.e**

Polygon D3_5K6.e			
Question	USFS Finding	ALP Suggestion	Comments
Overall	Low	Low	The low rating is due to the small size of this area. I'm not sure why the Forest Service defined it in this way. I'd suggest redrawing the boundaries of D3_5K6.b and D3_5K6.d to come closer to the private property and 566, and then eliminating this area from consideration as it is essentially a buffer zone.
1.a	High	High	Agree. Except for areas near roads and improvements, the vegetation is healthy and natural.
1.b	High		Agree
1.c	Low	Moderate	There are indeed concentrations of improvements near the private property. However, if the boundaries were drawn slightly differently, they would not be an issue.
2.a	Low	Low	Agree, but this is mostly because of the arbitrarily small size.
2.b	Low	Low	Agree, because of the size.
5.a	Low	Low	Agree, because of the size.

**Table 6. Polygon D3\_5K7.c**

Polygon D3_5K7.c			
Question	USFS Finding	ALP Suggestion	Comments
Overall	Low	Moderate	The Low ratings by the FS on individual criteria and overall may be true for the lower stretches of the area, but not for the upper portions. I would agree that some the area is not suitable, but not all. The boundaries could easily be redrawn to reflect this.
1.a	Moderate	Moderate	Agree with FS assessment for the lower western portions of the area, but not for the upper portions. The upper hills and ridges are very natural.
1.b	High	High	The upper portions of this area are very natural.
1.c	Low	Moderate	The Low rating seems contradictory to the finding for 1.b as High. The upper portions of this area have no human development at all. All human development is along the 24 and 123FAB. The boundary could be redrawn to exclude these areas.
2.a	Low	Moderate	Contrary to the FS finding, this area is free of the noise of the helicopter landing zones. Furthermore, there is essentially no road noise as 24 gets maybe one vehicle per day and the sound is attenuated by terrain and vegetation. In my many days of hiking in this area I've never been bothered by noise. I do not understand the FS thinking on this point. Perhaps there is a mistake about the location?
2.b	High	High	Agree
5.a	Low	Moderate	The FS cites active mining claims in this area but provides no documentation or coordinates. I have encountered no evidence of mining activity in the area during my field work. In addition, there is no current of planned military training within D3_5K7.c, as shown in Figure 6. The area could easily be managed as wilderness by noting road closures. Grazing would not be affected. Grazing-related maintenance is restricted to areas near 24 and 123FAB, which would be cherry-stemmed out. The upper portions are inaccessible by vehicle.



**Table 7. Polygon D3\_5K7.d**

Polygon D3_5K7.d			
Question	USFS Finding	ALP Suggestion	Comments
Overall	Low	High	I am baffled by and strongly disagree with the overall finding on D3_5K7.d, which represents one of the wildest and most untouched areas of the Bears. The only Low finding on the individual criteria was related to 5.a and the ability to manage as wilderness. Contrary to the FS finding, this would be the easiest area to manage as wilderness as it is inaccessible by any road or track. In addition, the FS erroneously refers to military activities being pervasive in the area, whereas no ground-based military activity is current or planned in the area, as shown in Figure 6. Refer to Figure 17, Figure 18, Figure 19, and Figure 20.
1.a	Moderate	High	This area includes the heart of the Bear Mountains and is completely natural except in small corridors along the top of 123FAB. The gramma grass is lush – and there many meadows. Lovely high and lonely. Refer to Figure 17, Figure 18, Figure 19, and Figure 20.
1.b	Moderate	High	I am slightly confused by the moderate finding for this area due to fuel wood cutting. As I understand the area in question, it is far from roads and tracks away from 123FAB and is completely natural. Perhaps the FS made a mistake? It mentions the presence of roads and there really aren't any.
1.c	High	High	This is one of the least impacted areas of the Bear Mountains.
2.a	Moderate	VERY High	I've spent countless days in this area and have never encountered a person or heard any noise from any road. It is far from roads and any human development. Helicopters landing and taking off from HLZ-26 are becoming more infrequent, and typically are there only for a couple of hours on Tuesday afternoons. There is also some helicopter activity at night. However, none of the helicopter noise is audible from the west side of the Bears, and very little from the higher elevations and ridges.
2.b	High	High	I agree.
5.a	Low	High	Contrary to the FS finding, this would be the easiest area to manage as wilderness as it is inaccessible by any road or track. In addition, the FS erroneously refers to military activities being pervasive in the area, whereas no ground-based military activity is current or planned in the area, as shown in Figure 6.



**Figure 17.** D3\_5K7.d. View from the ridge of the Bears. In the heart of the Bears, there is no sign of any human development as far as eye can see. No evidence of fences along the ridges. (34°17'40.76"N, 107°17'48.58"W).



**Figure 18.** Polygon D3\_5K7.d. Meadows on the west side of the ridge of the Bears. Note the lush grass and no sign of any human development. (34°17'18.52"N, 107°17'47.31"W).



**Figure 19.** Polygon D3\_5K7.d. Looking up into this area from the end of 123BFAB on the west side of the Bears. There are no developments or tracks beyond this point and vegetation is completely natural. ( $34^{\circ}16'46.17''\text{N}$ ,  $107^{\circ}19'10.09''\text{W}$ ).



**Figure 20.** Polygon D3\_5K7.d. The end of 123FAB. There is no sign of 123FB, as the track does not continue. Vegetation is completely natural for pre-monsoon June. No developments at all between here and the end of 24. ( $34^{\circ}16'45.85''\text{N}$ ,  $107^{\circ}19'10.73''\text{W}$ ).



**Table 8. Polygon D3\_5K7.f**

<b>Polygon D3_5K7.f</b>			
<b>Question</b>	<b>USFS Finding</b>	<b>ALP Suggestion</b>	<b>Comments</b>
Overall	Low	Moderate	I disagree with the FS finding of Low. Much of the area is contains natural vegetation with no human development. See Figure 21 and Figure 22. The boundaries could easily be redrawn to exclude areas near private property and 354E. Military activity is restricted to foot traffic away from 354 and the base camp, and occurs only 5 times per year. Helicopters landing at HLZ-26 do cause a noise disturbance, but are becoming less frequent. I have seen no evidence of active mining during my field work or hiking, and suggest that the FS provide documentation and coordinates of such activities.
1.a	Low	Moderate / High	I agree with the assessment of Low near the private property and near 354E. However, as you head south and gain higher ground, the area becomes much more natural and would deserve a High rating. The boundary of this region could easily be redrawn to reflect this variation. See Figure 21, and Figure 22. I have nearly 50 photos documenting my field work in this area and have seen no salt cedar.
1.b	High	High	I agree with this finding based on my field work.
1.c	Moderate	Moderate / High	I agree with the Moderate assessment near the private property and near 354E. However, as you head south and gain higher ground, human impacts are out of sight due to vegetation and terrain. The boundary of this region could easily be redrawn to reflect this variation.
2.a	Low	Moderate	I have property near this area and have spent a lot of time hiking in the vicinity. Although I dislike the sound of the helicopters when they train (mostly on Tuesday afternoons for a couple of hours, and some nights) they have not intruded on my solitude in a substantial way. There is essentially no noise from 354 as it sees very little traffic – often less than one car per hour, and this would only be audible very close to the road.
2.b	High	High	Agree
5.a	Low	Moderate	Although the military does use some of this area for ground-based training, no vehicles are involved away from 354 and the base camp in Baca Canyon. Ground-based training involves soldiers on foot, which does not affect the ability to manage as wilderness. I have never come across any active mining sites in the area despite hours of hiking.



**Figure 21.** Polygon D3\_5K7.f Natural vegetation on the east side of the area. (34°19'10.55"N, 107°14'21.61"W).



**Figure 22.** Polygon D3\_5K7. Natural, healthy vegetation. (34°19'0.38"N, 107°14'30.06"W)

**Table 9. Polygon D3\_5K7**

Polygon D3_5K7			
Question	USFS Finding	ALP Suggestion	Comments
Overall	Low	VERY High	<p>The FS has separated D3_5K7 and D3_5K7.b for unknown reasons and hasn't clarified where the boundaries are. This makes it very difficult to comment on these areas separately. I strongly disagree with the FS finding of Low. It is based on undocumented assertions about difficulties in managing this area as wilderness and lack of wilderness characteristics.</p> <ul style="list-style-type: none"> <li>The FS cites many fences along boundaries that may require motorized vehicle for maintenance, but the fences I documented during many days of field work are inaccessible by motorized vehicles and any maintenance is accomplished on by horseback. There was no evidence of vehicle tracks along fences that might indicate maintenance by ATV.</li> <li>There is no military training in most of the area as it lies outside the tactical training zone (see Figure 6). Within the tactical training area on the east side of the Bears, military training is un-motorized.</li> <li>The assertion that most of the area does not possess wilderness characteristics is unsupported by my extensive fieldwork showing natural and lush vegetation, and only isolated human impact.</li> </ul> <p>Contrary to the FS finding, I suggest that this area has strong wilderness characteristics and because of its isolation would be easy to manage as such as long as there was good communication with the grazing permit holder. See Figure 23, Figure 24, Figure 25, and Figure 26).</p>
1.a	Low	High	<p>I am baffled by the Low finding, as the FS narrative states: "D3_5K7: The majority of the vegetation is pinyon juniper with some ponderosa mix, deciduous shrub and grama mix mountain mahogany (elderleaf mix)." It refers to salt cedars in drainages. My field work found no salt cedar and very healthy vegetation within this area.</p>
1.b	High	High	I agree, and find this contradictory to the rating for 1.a above.
1.c	High	High	I agree. This is a very isolated area, far from any road.
2.a	Moderate	High	<p>I am baffled by the FS finding, as during my field work and hiking I spent days in this area and never encountered another person. There are great opportunities for solitude. There are no roads leading into the area, except for CR12A which will be decommissioned and is not used by vehicles in any case. It is one of the most lonely areas of the Bears, with great opportunities for solitude.</p>
2.b	High	High	Agree
5.a	Low	High	<p>The FS has separated D3_5K7 and D3_5K7.b for unknown reasons and hasn't clarified where the boundaries are. This makes it very difficult to comment on these areas separately. I strongly disagree with the FS finding of Low. It is based on undocumented assertions about difficulties in managing this area as wilderness and lack of wilderness characteristics.</p> <ul style="list-style-type: none"> <li>The FS cites many fences along boundaries that may require motorized vehicle for maintenance, but the fences I documented during many days of field work are inaccessible by motorized vehicles and any maintenance is accomplished on by horseback. There was no evidence of vehicle tracks along fences that might indicate maintenance by ATV.</li> <li>There is no military training in most of the area as it lies outside the tactical training zone (see Figure 6). Within the tactical training area on the east side of the Bears, military training is un-motorized.</li> <li>The assertion that most of the area does not possess wilderness characteristics is unsupported by my extensive fieldwork showing natural and lush vegetation, and only isolated human impact.</li> </ul> <p>Contrary to the FS finding, I suggest that this area has strong wilderness characteristics would be easy to manage as wilderness as long as there was good communication with the grazing permit holder.</p>





**Figure 23.** Polygon D3\_5K7. Rugged, isolated canyon at the end of CR12A (which will be closed under the new management plan). (34°21'17.42"N, 107°18'12.84"W).



**Figure 24.** Polygon D3\_5K7. Cottonwoods at undeveloped spring near the end of CR12A. No sign of humans.(34°21'27.93"N, 107°18'12.77"W).





**Figure 25.** Polygon D3\_5K7. Unmaintained, unused fence above Scott Canyon. ( $34^{\circ}18'10.66''\text{N}$ ,  $107^{\circ}19'53.55''\text{W}$ )



**Figure 26.** Polygon D3\_5K7. Wide open spaces looking up toward the ridge of the Bears from near the top of Scott Canyon. Lush grass, wildflowers, and no sign of fences or human development. ( $34^{\circ}18'14.55''\text{N}$ ,  $107^{\circ}19'43.86''\text{W}$ ).

**Table 10. Polygon D3\_5K7.b**

Polygon D3_5K7.b			
Question	USFS Finding	ALP Suggestion	Comments
Overall	Low	High	<p>The FS has separated D3_5K7 and D3_5K7.b for unknown reasons and hasn't clarified where the boundaries are. This makes it very difficult to comment on these areas separately. I strongly disagree with the FS finding of Low. It is based on undocumented assertions about difficulties in managing this area as wilderness and lack of wilderness characteristics.</p> <ul style="list-style-type: none"> <li>The FS cites many fences along boundaries that may require motorized vehicle for maintenance, but the fences I documented during many days of field work are inaccessible by motorized vehicles and any maintenance is accomplished on by horseback. There was no evidence of vehicle tracks along fences that might indicate maintenance by ATV.</li> <li>There is no military training in most of the area as it lies outside the tactical training zone (see Figure 6). Within the tactical training area on the east side of the Bears, military training is unmotorized.</li> <li>The assertion that most of the area does not possess wilderness characteristics is unsupported by my extensive fieldwork showing natural and lush vegetation, and only isolated human impact.</li> </ul> <p>Contrary to the FS finding, I suggest that this area has strong wilderness characteristics would be easy to manage as such as long as there was good communication with the grazing permit holder.</p>
1.a	Low	High	<p>I am baffled by the Low finding, as the FS narrative states: "D3_5K7.b: The majority of the vegetation is pinyon juniper with some ponderosa mix, deciduous shrub and grama mix mountain mahogany (elderleaf mix)." It refers to salt cedars in drainages. My field work found non-native species only within 100 feet or so of roads, which would constitute a buffer zone, and near stock tanks, which are at the end of roads and would be cherry-stemmed out.</p>
1.b	High	High	I agree, and find this contradictory to the rating for 1.a above.
1.c	High	High	I agree, as away from roads there are no human developments or activities.
2.a	Moderate	High	<p>I am baffled by the FS finding, as during my field work and hiking I spent days in this area and never encountered another person. There are great opportunities for solitude. The area is separated from 123 by private property, which is sparsely populated. I felt completely alone.</p>
2.b	High	High	Agree
5.a	Low	High	<p>I am having a difficult time distinguishing where the boundaries between D3_5K7.b and D3_5K7.e. The FS does not cite any references for the developments that may require maintenance, but I suspect they are associated with existing tracks that could be cherry-stemmed out. The fences I encountered during my days of field work were either completely unmaintained or maintained by horseback, as they were not accessible by any road. There was no evidence of vehicle tracks along fences that might indicate maintenance by ATV. Contrary to the FS finding, there is no military training in the area, which lies outside the tactical training area (see Figure 6). I suggest that this area would be easy to manage as wilderness, as long as there was good communication with the grazing permit holder.</p>

**Table 11. Polygon D3\_5K7.e**

Polygon D3_5K7.e			
Question	USFS Finding	ALP Suggestion	Comments
Overall	Low	High	<p>I am baffled by the Low finding on the individual criteria which the FS sites as justification for its low rating. Contrary to this assessment, based on my field work I find:</p> <ul style="list-style-type: none"> <li>• Vegetation is natural and healthy over the majority of the area</li> <li>• Human impacts are restricted to areas in the upper stretches of 123AB which could easily be cherry-stemmed out.</li> <li>• There are fantastic opportunities for solitude and numerous options for primitive recreation (hunting, bird-watching, hiking, etc.).</li> <li>• Management as wilderness would be relatively easy due to the inaccessibility of the area, as long as there was good communication with the grazing permit holder.</li> </ul> <p>Refer to Figure 27, Figure 28, Figure 29, and Figure 30.</p>
1.a	Low	High	<p>I am baffled by the Low finding, as the FS narrative states: “D3_5K7.e: The majority of the vegetation is pinyon juniper with some ponderosa mix, deciduous shrub and grama mix mountain mahogany (elderleaf mix).” It refers to salt cedars in drainages. My field work found non-native species only within 100 feet or so of roads, which would constitute a buffer zone, and near stock tanks, which are at the end of roads and would be cherry-stemmed out.</p>
1.b	High	High	<p>I agree, and find this contradictory to the rating for 1.a above.</p>
1.c	Low	High	<p>During my field work I hiked all over this area (up Scott Canyon and beyond) and found no sign of human development away from 123QA and the very upper stretches of 123AB, which is inaccessible from 123 due to heavy erosion. The tracks in the area could easily be cherry-stemmed out, which would include the associated developments.</p>
2.a	Low	High	<p>I am baffled by the FS finding, as during my field work and hiking I spent days in this area and never encountered another person. There are great opportunities for solitude.</p>
2.b	Moderate	High	<p>Again, I’m baffled by the Moderate rating. It does not appear to reflect any specific comments in the narrative.</p>
5.a	Low	Moderate	<p>All developments occur on or at the end of tracks that could be cherry-stemmed out (specifically 123AB). The majority of the area has no developments that require maintenance. With proper communication with the grazing permit holder, this area would be easy to manage as wilderness. Contrary to the FS finding, there is no military training in the area, which lies outside the tactical training area (see Figure 6).</p>





**Figure 27.** Polygon D3\_5K7.e. Healthy vegetation in canyon. ( $34^{\circ}18'36.39''\text{N}$ ,  $107^{\circ}19'18.25''\text{W}$ )



**Figure 28.** Polygon D3\_5K7.e. Wild, isolated, and untrammeled land ( $34^{\circ}18'43.72''\text{N}$ ,  $107^{\circ}19'19.10''\text{W}$ )





**Figure 29.** Polygon D3\_5K7.e. Lovely riparian area just a few feet above a small tank. Topography and vegetation obscure any sign of development. ( $34^{\circ}18'53.21''\text{N}$ ,  $107^{\circ}19'18.07''\text{W}$ ).



**Figure 30.** Polygon D3\_5K7.e. Ponderosa Pine forest just feet away from the end of 123BB. There is no sign of vehicular traffic off the track. ( $34^{\circ}19'0.79''\text{N}$ ,  $107^{\circ}19'33.73''\text{W}$ ).

**Table 12. Polygon 8**

Polygon 8			
Question	USFS Finding	ALP Suggestion	Comments
Overall	Low	Moderate	The shape of Polygon 8 makes it difficult to rate consistently. Much of the area has outstanding native vegetation, no signs of human development, and great opportunities for solitude. Furthermore much of the area is outside the military's tactical training zone, as shown in Figure 6. The boundaries of this area could be redrawn to minimize the disqualifying features, and certainly deserves more rigorous analysis in Phase 3. See Figure 31, Figure 32, Figure 33, and Figure 34 for examples of rugged and isolated wilderness worthy areas in Polygon 8.
1.a	Low	Moderate	As noted in the FS narrative, the predominant vegetation in this area is natural. The populations of non-native species are not sufficient to disqualify this entire area from further consideration.
1.b	Moderate	Moderate	This is a fair assessment, especially in the eastern portions of the area.
1.c	Moderate	Moderate	This is a fair assessment.
2.a	Low	Moderate	I'm surprised by this assessment, as there is little human activity in the area. The bordering roads are 354 and 354E, each of which has very limited traffic. In fact 354E is only used by the owner of the grazing allotment to access his property. CR12A is impassable except by ATV and is slated to be closed in the new Travel Management Plan. I've spent several days in this area and never encountered a soul.
2.b	Moderate	Moderate	This is a fair assessment.
5.a	Low	Moderate	The FS explains its Low rating by citing grazing and military training activities. Overgrazing does present a problem in some areas, but the land is quite healthy in others. Most of the area lies outside the area for military training, as shown in Figure 6. In fact, this area would be very easy to manage as wilderness due to the lack of public access (locked gate on 354E, decommissioned road on CR12A, and no other unauthorized roads that I'm aware of.



**Figure 31.** Polygon 8. View of the Sierra Ladrones from the western edge of Polygon 8. The country is wild and isolated. There is no sign of development on the west side, away from the primitive track 154WA. (34°20'25.97"N, 107°16'42.33"W).



**Figure 32.** Polygon 8. Smooth rock formations along wash on the west side of Polygon 8. (34°21'9.22"N, 107°16'43.32"W). No sign of human development apart from a couple of tanks that could be accessed from CR12AB and 354WA.





**Figure 33.** Polygon 8. Development on private land just before entering NSFS land on CR12A on the north side of Polygon 8. No further development on CR12A or CR12AB, although there is one rusty and unusable small tank not far up the arroyo.



**Figure 34.** Polygon 8. Beautiful, untrammed arroyo where CR12A is supposed to be. This track is completely disused, although there was some evidence of ATV tracks further along. However, there are no developments to maintain along this track. (34°23'1.23"N, 107°16'58.84"W).



**Table 13. Polygon D3\_ADJ9**

Polygon D3_ADJ9			
Question	USFS Finding	ALP Suggestion	Comments
Overall	Low	Moderate	This area deserves further consideration in the context of its adjacency to the BLM WSA. Considering it in isolation as done here is unwarranted. In addition, Baca Canyon is home to wonderful cottonwoods and cliffs that provide home to numerous raptors. It is a riparian area worthy of good management. Refer to Figure 35.
1.a	Moderate	Moderate	There are some non-native species, but the vast majority of the area is natural. There are beautiful cottonwoods in Baca Canyon, which is a rarity for this region. Refer to Figure 35.
1.b	Moderate	Moderate	Away from 354, there is no evidence of fuel-cutting and grazing impacts are limited.
1.c	Moderate	Moderate	Fair assessment.
2.a	Low	Moderate	The only thing interfering with opportunities for solitude is occasional military training in Baca Canyon. There is NO noise from the powerline, and suggesting this might interfere with solitude is far-fetched. When considered in conjunction with the adjacent BLM WSA, the opportunities for solitude only increase.
2.b	High	High	Agree.
5.a	Low	Moderate	The FS sites military training as the reason for a Low rating, as well as “maintenance” issues. Military activities in Baca Canyon and a water tank and windmill are the only concerns. See Figure 36. These could be dealt with by closing Baca Canyon to training below the stock tank at the beginning of 354XA which is slated to be decommissioned anyway.



**Figure 35.** Polygon D3\_ADJ9. Cottonwoods in Baca Canyon. ( $34^{\circ}20'49.52''\text{N}$ ,  $107^{\circ}12'36.74''\text{W}$ ).



**Figure 36.** Polygon D3\_ADJ9. Power tank is only development in Baca Canyon all the way to the boundary with BLM. As it is near the powerline, it may not even be included in the area under consideration. ( $34^{\circ}20'44.45''\text{N}$ ,  $107^{\circ}13'12.56''\text{W}$ ). Military vehicles are supposed to stop at this point, removing them from consideration.

**Table 14. Polygon D3\_ADJ10**

Polygon D3_ADJ10			
Question	USFS Finding	ALP Suggestion	Comments
Overall	Low	High	When considered in conjunction with the BLM WSA, this area should have high priority as potential wilderness. Vegetation is natural and healthy, it possesses many rugged and isolated canyons, and most lies outside the area of military training. I suggest extending this area west beyond the powerline, and around my property, all the way to 354. See Figure 37, Figure 38, Figure 39, and Figure 40.
1.a	Moderate	High	There are some non-native species, but the vast majority of the area is natural. The grasses are lush and high, and woody vegetation natural and healthy. Refer to Figure 37.
1.b	Moderate	High	This area is untrammled and there are no signs of human development. I would even suggest extending beyond the powerline all the way to 354 and around my property. Refer to Figure 39.
1.c	Moderate	High	This area sees essentially no human activity and is far from any road. Refer to Figure 37Figure 38Figure 39
2.a	Low	High	This is a very large area and has no road access except at the point where the powerline intersects 354 O. 354O has essentially traffic – days go by without any sign of a vehicle. There is NO noise from the powerline, and suggesting this might interfere with solitude is far-fetched. When considered in conjunction with the adjacent BLM WSA, the opportunities only increase.
2.b	High	High	I agree.
5.a	Low	High	I disagree with the Low finding on all counts: there is no evidence of military training south of Baca Canyon, and much of this area is outside the tactical training area as shown in Figure 6. Nor is there any sign of the use of motorized vehicles to maintain fences. Refer to Figure 40



**Figure 37.** Polygon D3\_ADJ10. Rugged and isolated country shows healthy native vegetation and no signs of human development. This is east of the powerline. Bear Mountains visible in the background. ( $34^{\circ}19'50.07''\text{N}$ ,  $107^{\circ}12'12.16''\text{W}$ ).



**Figure 38.** Polygon D3\_ADJ10. View across the east end of the area. This is far from any road, and shows no sign of human development. ( $34^{\circ}19'42.27''\text{N}$ ,  $107^{\circ}12'7.89''\text{W}$ ).





**Figure 39.** Polygon D3\_ADJ10. Rugged canyon, far from any road, no sign of human development. (34°19'47.21"N, 107°12'20.32"W).



**Figure 40.** Polygon D3\_ADJ10. Old fence maintained by horseback. No sign of any motorized vehicles. (34°19'22.41"N, 107°12'7.84"W).

Table 15. Polygon D3\_5K5

Polygon D3_5K5			
Question	USFS Finding	ALP Suggestion	Comments
Overall	Low	Moderate	The FS rated this area as <u>Low</u> , based on the possibility of extending the permit military training in the area and adding a new helicopter landing zone (HLZ). However, as shown in <b>Figure 6</b> military training within D3_5K5 is restricted to foot traffic and occurs only five times per year. The proposed new HLZ (which is unlikely to be approved) would be at the very edge of NSFS land and could be excluded from any wilderness proposal. The evaluation team found that the area would be rated “high” on question 5a, if there were to be no military training, and “low” if it were allowed. Since military training in this area is currently restricted to foot traffic during ground-based exercises which occur during very limited times, the finding should be changed to <u>Moderate</u> , and carried into Phase III analysis.
1.a	Moderate	Moderate	While I do not disagree with the finding “Moderate”, the FS finding seems to be based on public comment, rather than on detailed assessment. If this is like other areas in the Bear Mountain region, Russian Thistle is only present near roads and stock tanks. I suggest a more detailed inventory of plants in the area to better understand the spatial distribution of non-native plants.
1.b	Moderate	Moderate	While I do not disagree with the finding “Moderate”, the FS over-emphasizes the areas of fuel wood cutting in isolated spots as detracting from natural conditions (as reported by public comment). Recommend field-based documentation.
1.c	Low	Moderate	The <u>Low</u> finding seems to give significant credence to inaccurate public comments (e.g., erroneous claims about mining claims). In fact, the district specialist reports that the interior is largely undeveloped. I suggest revising this finding to <u>Moderate</u> , pending further analysis.
2.a	Low	High	The interior of this area is completely screened from the traffic on 354 and from the other open primitive road. Other roads / tracks into the area are unauthorized under the current management plan. Absent military training, this area is rated <u>High</u> for the ability to be managed as wilderness. And as Thus, I recommend changing this rating to <u>High</u> .
2.b	High	High	Agree with FS rating.
5.a	Low	Moderate	Rating this as <u>Low</u> , contradicts the team finding about the need for two ratings (high and low) pending a decision on the extending the permit for military training. However, as shown in <b>Figure 6</b> existing military training within D3_5K5 is restricted to foot traffic and occurs only five times per year. The proposed new HLZ (which is unlikely to be approved) would be at the very edge of NSFS land and could be excluded from any wilderness proposal. The evaluation team found that the area would be rated “high” on question 5a, if there were to be no military training, and “low” if it were allowed. Since military training in this area is currently restricted to foot traffic during ground-based exercises which occur during very limited times, the finding should be changed to <u>Moderate</u> , and carried into Phase III analysis.