August 31, 2016

Ms. Sarah Browne
Forest Planner
Cibola National Forest and National Grasslands
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Albuquerque, NM 87113
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Dear Ms. Browne:

Thank you for the opportunity to comment on Phase 3 of the Cibola National Forest "Potential Wilderness Inventory and Evaluation Process." I have attached my detailed comments pertaining to the Bear Mountains. These comments are based on extensive field work over the last several years, and include photo-documentation. For completeness, I have also attached my comments for Phases 1 and 2.

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 and strongly disagree.

The Evaluation Form for "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.
- **Lack knowledge of conditions on the ground and disregard for the vast amount of information I provided as comments during Phases 1 and 2** that demonstrates findings that contradict those of the evaluation team.
- **Misleading and erroneous statements about military training** and its impact on wilderness.
- **Lack of interest in wilderness management options** that would be effective for this area.

As next steps, I recommend
- Include the Bear Mountains in the Phase 3 analysis.
- 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.

Sincerely,

Arian Pregenzer
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