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August 22, 2016

Ms. Elaine B. Kohrman, Forest Supervisor
Cibola National Forest
United States Forest Service
2113 Osuna Road, NE
Albuquerque, NM 87113

RE: Cibola National Forest Mountain Ranger Districts Plan Revision – Preliminary Draft Land and Resources Management Plan

Dear Ms. Kohrman:

New Mexico Department of Agriculture (NMDA) submits the following comments in response to the Cibola National Forest's (Cibola NF) request for comments on the Preliminary Draft Land and Resources Management Plan (Preliminary Plan) and associated documents. NMDA's comments are organized by documents that are available for public comment and also include the comment form that Cibola NF provided for the Preliminary Plan. An issue that is addressed throughout the Preliminary Plan is water management. NMDA insists the management of water and water rights rests solely with the New Mexico Office of the State Engineer (NMOSE). We have noted specific areas that should be corrected within our comments but also request that Cibola NF review the entirety of the Preliminary Plan to address this important point.

One part of NMDA's role is to provide proactive advocacy and promotion of New Mexico's agricultural industries. NMDA supports management of National Forest System lands under the principles of multiple use and sustained yield as congressionally mandated by the Multiple-Use and Sustained Yield Act of 1960 (16 U.S.C. 528-531) and further codified by the National Forest Management Act of 1976 (16 U.S.C. 1601-1614).

Ms. Elaine Kohrman

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Thank you for the opportunity to submit comments for the Cibola NF's Preliminary Plan. Please contact Ms. Lacy Levine at (575) 646-8024 or llevine@nmda.nmsu.edu with any questions regarding these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JM Witte', with a stylized flourish at the end.

Jeff M. Witte

JMW/ll/ya

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General Comments

NMDA requests that all grazing permit holders on the Cibola NF be mailed a notification letter when the next Draft Forest Plan is published in the following spring. During several public meetings related to the release of this Preliminary Plan, grazing permittees expressed concern about not having enough time to thoroughly read and provide comments. NMDA is hopeful that notifying permittees of the Preliminary Plan's availability for public comment will help grazing permittees provide meaningful feedback on these important documents.

Preliminary Draft Forest Plan

NMDA previously submitted comments on the Preliminary Plan as a cooperating agency. Several of our initial comments have already been incorporated into this version. Please refer to the comment form Cibola NF provided below for our remaining comments that have not yet been incorporated as well as new comments we have on the Preliminary Plan.

Document Reviewed (draft plan, wilderness process paper, map)	Resource Section	Page No.	Line No.	Comment
Preliminary Draft Forest Plan	Throughout			The Preliminary Plan uses the terms "forest resource" and "water resource features" throughout the plan, yet the terms are never defined. NMDA requests these terms be defined in the Glossary of Terms.
Preliminary Draft Forest Plan	Throughout			Throughout the Preliminary Plan, Cibola NF refers to the Assessment Report in inconsistent ways. NMDA requests the title and citations be made consistent throughout the document.
Preliminary Draft Forest Plan	Throughout			In many resource sections, the Management Approaches, Guidelines, Standards, etc., were removed. NMDA suggests that these plan components are useful tools that should be included in all applicable resource sections in order to achieve the stated Desired Conditions.
Preliminary Draft Forest Plan	Literature Cited			Some references and citations are included as footnotes and some are included as in-text citations. NMDA requests the next Preliminary Plan be updated throughout with a consistent referencing approach. Also, the Literature Cited section cites several authors and publications that are not referenced within the body of the Preliminary Plan. These authors and publications should either be

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				referenced in the document or should be removed.
Preliminary Draft Forest Plan	Ch. 2 Vegetation – Background and Description – Ecological Classification	20	12	NMDA requests the term "polygon" be explained in this paragraph and defined in the Glossary of Terms.
Preliminary Draft Forest Plan	Ch. 2 Vegetation – Background and Description – Range of Values	20	30	NMDA suggests an example be provided on how the Cibola NF “tempered [the ranges of values] by socioeconomic desires” in this section.
Preliminary Draft Forest Plan	Ch. 2 Vegetation – Plan Elements Common to All Vegetation Types – Climate Change	23	5	NMDA requests clarification on where the “areas of high vulnerability to climate change” are located. Please describe these areas and provide a map of the areas in order to compare them to their corresponding watersheds. This information will help in future forest projects and for identifying restoration focus areas.
Preliminary Draft Forest Plan	Ch. 2 Vegetation – Plan Elements Common to All Vegetation Types – Insects and Disease	23	26-27	NMDA requests an additional Desired Condition be added to this section that addresses monitoring, recovering, and mitigating severe and/or uncharacteristic disease outbreaks to ensure watershed health. It is not enough to simply desire that only endemic infestations will occur – severe outbreaks must be addressed.
Preliminary Draft Forest Plan	Ch. 2 Vegetation – Plan Elements Common to All Vegetation Types – Plant Community	24	11-15	NMDA requests another Management Approach be added (or add to the existing Management Approach in this section) which states that soil studies will be conducted prior to management activities being initiated. Soil studies and surveys are often done on larger

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	Species Composition			scales than are appropriate for site-specific activities and may, therefore, be inaccurate.
Preliminary Draft Forest Plan	Ch. 2 Vegetation – Plan Elements Common to All Vegetation Types – Significant Plant Communities and Individual Plants	24	20	NMDA requests that a citation be provided for “American Forests.”
Preliminary Draft Forest Plan	Ch. 2 Vegetation – Plan Elements Common to All Vegetation Types – General Management of All Vegetation Types	26	20	NMDA requests the removal or clarification of this guideline because, as it is currently written, it will prohibit selective harvest for restoration activities in areas recommended for wilderness designation.
Preliminary Draft Forest Plan	Ch. 2 Vegetation – Plan Elements Common to All Vegetation Types – General Management of All Vegetation Types	28	20-22	NMDA requests the term "native species" be clarified. Was the intended term "native vegetation species," “native animal species,” or “all native species”? Also, why is this Management Approach only applicable to designated wilderness areas? Further, NMDA requests coordinating with all affected stakeholders during project implementation – not just the New Mexico Department of Game and Fish (NMDGF).
Preliminary Draft Forest Plan	Ch. 2 Vegetation – Forest Vegetation Types – Mixed Conifer with Aspen Forest	32	Footnotes	The two footnotes on this page reference Reynolds et al. 2014. The Literature Cited section references this publication as 2013 – please correct this minor error.

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Preliminary Draft Forest Plan	Ch. 2 Watershed Resources	53-65	All	In reference to the relocation of groundwater wells throughout these chapters, NMDA requests that Cibola NF include language to ensure water quality and quantity of the newly relocated wells be comparable to existing wells at no additional cost to the water rights owner.
Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Watersheds – Background and Description	53	23-27	NMDA requests that a map and list of all watersheds and their conditions be provided (even if it is as an appendix or reference to the Assessment Report) for both general reference and for setting priorities for restoration work.
Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Soil – Background and Description	55	2-16	NMDA requests a description on the current soil condition be added to this section. This information will help establish the condition of watershed resources as a whole and will help determine priorities for the stated objectives.
Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Groundwater – Guidelines	58	13	The United States Forest Service (USFS) lacks any authority to manage groundwater or to place any conditions on the use of groundwater and the property rights thereof under New Mexico law. All references to "managed groundwater" should be removed in this section or clarified to state that all groundwater management activities will be completed with coordination with the water rights holder and NMOSE.
Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Groundwater – Management Approaches	59	3-5	The proximity of surface water is not a sufficient criterion in determining aquifer connectivity. Sources of groundwater recharge are also not immediately evident due to the unpredictable movement of subsurface water. Instead of requiring proof that surface water and groundwater resources are not connected, USFS should demonstrate how they are connected using well-defined and site-specific criteria.

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Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Groundwater – Management Approaches	59	6-9	USFS does not have authority to evaluate applications sent to NMOSE for water rights. It is understood that USFS requires proof that necessary water rights are obtained by written authorization holders prior to project approval involving groundwater use on National Forest System lands; however, the authority to evaluate and approve water rights applications rests solely with the states. NMDA requests this Management Approach be removed.
Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Water Resources Features and Wetland/Riparian – Desired Conditions	60	12-13	<p>Given the relationship between groundwater and surface water, it may not be feasible to achieve this Desired Condition due to the fact that groundwater withdrawals are a necessity for water access by communities and forest users alike – especially in times of drought, which are expected to become more frequent.</p> <p>Again, USFS does not have purview over groundwater withdrawal activity. Therefore, this Desired Condition is not feasible under the management of the Preliminary Plan.</p>
Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Water Resources Features and Wetland/Riparian – Standards	60	38-39	Why does this Standard include only tribal governments? Other stakeholders such as allotment owners, local communities, and local governments should also be consulted. NMDA requests this Standard be edited to state: "All affected government and community stakeholders will be consulted during the planning of projects that involve water resources, wetland, and riparian resources.
Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Water Resources Features and Wetland/Riparian – Guidelines	61	39-41	USFS proposes restrictions on water uses in order to protect aquatic habitat, riparian areas, and other uses. NMDA is concerned with the subjectivity of including the terms "should allow" and "should only be allowed" in these two Guidelines. NMDA would like clarification on the methodology of determining minimum water flows and what

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				exactly is "enough" water to support ecosystems referenced in the Guidelines. NMDA requests these Guidelines be more clearly described to ensure that USFS is working within the laws and policies of both USFS and NMOSE.
Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Water Resources Features and Wetland/Riparian – Guidelines	62	27-28	NMDA requests a provision be added to this Guideline to allow for the treatment of invasive species in riparian areas.
Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Water Uses	63-65	All	<p>According to NMOSE, Non-Consumptive use is defined as, "Water drawn for use that is not consumed, such as water diverted for hydroelectric generation. It also includes such uses as boating and fishing, where water is still available for other uses at the same site" (NMOSE, "Glossary of Water Terms," available at http://www.ose.state.nm.us/WR/glossary/.php.</p> <p>Many sections in the Preliminary Plan indicate the Cibola NF intends to regulate water use for purposes such as maintaining minimum water flows, which means it is not available for other uses, thus not a nonconsumptive use. NMDA recommends rewriting sections in this chapter and throughout the Preliminary Plan that refer to this issue to more accurately define the nonconsumptive use of water as well as make certain USFS does not exceed its authority as related to water and its regulation within the state.</p>
Preliminary Draft Forest Plan	Ch. 2 – Watershed Resources – Water Uses –	63	25-32	Water used to graze livestock is not a USFS use. Livestock water is put to beneficial use by the owner of livestock, not USFS. In order to add clarity to this Background section, NMDA requests that lines 25-32 be edited to state,

Document Reviewed (draft plan, wilderness process paper, map)	Resource Section	Page No.	Line No.	Comment
	Background and Description			"The amount of water used in the USFS is related to forest management activities such as recreation sites and wildlife watering. Many of the water uses, such as water used for livestock grazing, on USFS land require water rights obtained from NMOSE. Cibola NF maintains a database of water rights approved by the state of New Mexico for consumptive uses within the planning area. Access to some types of water uses are managed through USFS permits such as drinking water, livestock watering, and ski areas. It is important these permits include guidelines to protect forest resources while providing water for multiple uses. Water used for USFS purposes should be used efficiently, without waste."
Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Water Uses – Standards	64	11-12	NMDA requests this Standard be edited to state, "Proposals to pump, transport, or utilize water are subject to valid existing water rights and should not impair resources on USFS lands."
Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Water Uses – Guidelines	64	17-20	Cibola NF proposes restrictions on water uses in order to protect aquatic habitat, riparian areas, and other uses. NMDA is concerned with the subjectivity of including the terms "should allow" and "should only be allowed" in these two Guidelines. NMDA would like clarification on the methodology of determining minimum water flows and what exactly is "enough" water to support ecosystems referenced in the Guidelines. NMDA requests these Guidelines be more clearly described to ensure USFS is working within the laws and policies of both USFS and NMOSE. Further, the qualifier "at all times" should be removed from this Guideline.

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Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Water Uses – Management Approaches	64	29-30	NMDA requests the phrase "and by the general public" be clarified. Is this in reference to recreational use?
Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Water Uses – Management Approaches	64	31-32	NMDA requests the removal of this Management Approach. NMDA recognizes the authority of USFS to obtain water rights. In New Mexico beneficial use of water is determined by the ultimate use to which the water is put. The only indispensable requirement is that the appropriator of a water right intends to use the waters for a beneficial purpose and actually applies them to that use. In the context of this Management Approach, the permittees, contractors, and other authorized users are the ones putting the water to beneficial use, not USFS. Further, the water rights referenced in this Management Approach are valid existing property rights that cannot be taken by USFS.
Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Water Uses – Management Approaches	64	37-38	While land acquisition may make sense from a forest management perspective, NMDA requests that Cibola NF exchange or sell existing Cibola NF lands to affected counties in conjunction with acquisitions to ensure a stable tax base for the affected counties. NMDA requests this Desired Condition be edited to reflect this equitable approach to land acquisitions.
Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Water Uses – Management Approaches	64	39	Restrictions based on special use permit conditions should not impair water rights.

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Preliminary Draft Forest Plan	Ch. 2 Watershed Resources – Water Uses – Management Approaches	65	3-4	NMDA requests this line be edited to state, "Subject to existing water rights; diversions of all water sources that support wetlands, riparian areas, aquifer recharge, or other important functions will be assessed and mitigated to minimize effects."
Preliminary Draft Forest Plan	Ch. 2 Species – Aquatic Species and Habitats – Guidelines	66	29-32	The words in parenthesis are concerning. The referenced documents often lack scientific justification for habitat criteria and management approaches. NMDA requests the referenced literature be reviewed in order to ensure it is applicable to the site in which it will be utilized.
Preliminary Draft Forest Plan	Ch. 2 Species – Terrestrial Species and Habitats – Management Approaches	69	14	The Management Approaches in this section are written inconsistently with Management Approaches in other sections. First, the Management Approaches in this section are worded similar to Desired Conditions and use passive voice rather than active voice. Similarly, several of the Management Approaches include background and descriptions – these sentences should be moved to the Background and Description subsection of the Terrestrial Species and Habitats section for consistency. Also, the paragraphs that make this section cluster several Management Approaches into one paragraph. For consistency with the rest of the Preliminary Plan, NMDA requests each Management Approach be separated into individual paragraphs.
Preliminary Draft Forest Plan	Ch. 2 Species – Nonnative, Invasive Species – Desired Conditions	71	25-26	NMDA requests this Desired Condition be removed in its entirety from the Preliminary Plan. The term "desirable non-native species" is very subjective and is not compatible with the "New Mexico Noxious Weed Memo and List" (see citation below). NMDA is concerned with how "desirable non-native species" versus undesirable non-native species

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				are determined and how those interpretations will be made.
Preliminary Draft Forest Plan	Ch. 2 Species – Nonnative, Invasive Species – Management Approaches	73	32-33	NMDA requests this Management Approach be clarified to explain the purpose of coordinating with the Cooperative Extension Service through New Mexico State University. We applaud this coordination but think this Management Approach should be more specific in the end goal of such coordination.
Preliminary Draft Forest Plan	Ch. 2 Range and Grazing – Desired Conditions	81	13-14	NMDA requests this Desired Condition be edited to state, "Collaborative planning between grazing permit holders and the Cibola NF results in livestock grazing and associated management activities that are in balance with the needs of wildlife forage, watershed groundcover, natural fire regime, and resilience to climate variability as well as the management needs of grazing permit holders." Adding language that includes collaboration between Cibola NF and forest users in this and other Desired Conditions will help in the long-term success of the management of Cibola NF.
Preliminary Draft Forest Plan	Ch. 2 Range and Grazing – Desired Conditions	81	16-17	NMDA requests clarification on this Desired Condition. Is it grazing permit holders, Cibola NF, or the public at large that should "recognize other multiple uses..."?
Preliminary Draft Forest Plan	Ch. 2 Range and Grazing – Standards	81	23-32	As we have mentioned in previous comments, lands identified as potentially suitable for wilderness during the Forest Plan Revision process would be managed under the nonimpairment policy (36 CFR 219.10 (b)(iv)) and would result in greatly reduced access for resource management and multiple uses. This nonimpairment policy extends the protection of congressionally designated wilderness areas to

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				recommended wilderness areas identified in this process. It is beyond the authority of USFS to manage an area as wilderness unless and until Congress actually designates such areas pursuant to the Wilderness Act of 1964. NMDA requests these Standards be edited to allow for existing motorized and mechanical access to continue at levels consistent with their current grazing permit in recommended wilderness areas. Also, the cited <i>USFS Manual</i> is in reference to existing wilderness – not recommended wilderness areas.
Preliminary Draft Forest Plan	Ch. 2 Range and Grazing – Guidelines	82	42-43	There is much disagreement in the scientific community regarding transmission of disease between domestic and wild sheep populations. NMDA requests that specific scientific reasoning be provided for the basis of this Guideline.
Preliminary Draft Forest Plan	Ch. 2 Range and Grazing – Guidelines	83	4-8	NMDA requests this Guideline be changed to state, "New constructed features, facilities, and management activities for range activities..." As written, this Guideline would retroactively apply to already constructed features, facilities, and management activities.
Preliminary Draft Forest Plan	Ch. 2 Range and Grazing – Guidelines	83	15-18	This Guideline should be edited to state, "Existing structures in recommended wilderness areas should be maintained but not expanded to protect the area's wilderness character (unless expansion was approved prior to the finalization of this Preliminary Plan)..." Also, in reference to the last sentence in this Guideline, will all grazing allotments be surveyed to establish what current conditions are for use of motor vehicle and mechanized equipment use? NMDA is concerned how this criteria will be established and upheld without a more descriptive Guideline.

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Preliminary Draft Forest Plan	Ch. 2 Range and Grazing – Management Approaches	84	4-6	NMDA requests this Management Approach be edited to state, "Livestock can be used as an immediate pre- or post-fire management tool..." The current language states, "Recognize that livestock could be used..." Recognition is not a management approach; therefore, NMDA requests this word be changed to create an actionable Management Approach.
Preliminary Draft Forest Plan	Ch. 2 Cultural Identity and Cultural Landscapes	86	36	This sentence should be edited to state, "Public lands are no longer seen by these suburban and urban users as places needed and used for their subsistence, but as areas that are still relatively undeveloped and provide opportunity for experiences that cannot be attained in urban environments." It is inaccurate to state that "contemporary users" (as opposed to suburban and urban) no longer use public lands for subsistence. All grazing permittees and other forest product users do indeed contemporarily use public lands for subsistence.
Preliminary Draft Forest Plan	Ch. 2 Land Ownership Adjustment and Boundary Management – Desired Conditions	94	21	While land acquisition may make sense from a forest management perspective, NMDA requests the Cibola NF exchange or sell existing Cibola NF lands to affected counties in conjunction with acquisitions to ensure a stable tax base for the affected counties. NMDA requests this Desired Condition be edited to reflect this equitable approach to land acquisitions.
Preliminary Draft Forest Plan	Ch. 2 Minerals and Geology – Renewable Energy – Desired Conditions	106	2-4	NMDA requests this Desired Condition be edited to state, "Energy transmission and development on the Cibola NF meets mandates to facilitate the transmission and development of energy resources in a manner that minimizes adverse impacts, does not detract from meeting other desired conditions applicable to the area, and does not adversely impact existing multiple uses in an area." Ensuring that all lawful and

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				appropriate uses of a given area is important in equitably managing the Cibola NF.
Preliminary Draft Forest Plan	Ch. 2 Scenic Resources – Desired Conditions	116	2-3	This Desired Condition says that scenery management, character, and values will be integrated into "all management decisions." NMDA asserts that scenery is not a scientific indicator of watershed health. While it can be used as a quick (though subjective) visual tool, range health monitoring must take precedence in management decisions for resources – especially grazing. NMDA requests all Desired Conditions that discuss management decisions based on scenery be edited to reflect this important point.
Preliminary Draft Forest Plan	Ch. 2 Special Uses – Guidelines	121	9-12	USFS proposes restrictions on water uses in order to protect aquatic habitat, riparian areas, and other uses. NMDA is concerned with the subjectivity of including the terms "should at all times allow" in this Guideline. NMDA would like clarification on the methodology of determining minimum water flows and what exactly is "sufficient" water to support ecosystems referenced in the Guidelines. NMDA requests these Guidelines be more clearly described to ensure that USFS is working within the laws and policies of both USFS and NMOSE. Further, the qualifier "at all times" should be removed from this Guideline.
Preliminary Draft Forest Plan	Ch. 2 Special Uses – Guidelines	121	13-16	USFS lacks any authority to manage groundwater or to place any conditions on the use of groundwater and the property rights thereof under New Mexico law. NMDA requests the removal of this Guideline.

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Preliminary Draft Forest Plan	Ch. 2 Special Uses – Guidelines	121	21-22 25-27 28-29	NMDA requests removal of these Guidelines as they are redundant of lines 11-14.
Preliminary Draft Forest Plan	Ch. 3 Management Areas	128	22-24	NMDA insists that language that enables the persistence of multiple uses – including permitted grazing – be included in this section. Regardless of which alternative is chosen, grazing should not be affected by the establishment of new Management Areas.
Preliminary Draft Forest Plan	Ch. 3 Designated Areas – Desired Conditions for all Designated Areas	128	31	NMDA requests an additional Desired Condition be added to this section to address stakeholder involvement in management decisions. We suggest the following be added as a Desired Condition, "Forest Service management and decision making for designated areas will involve stakeholders affected by the management of a given area. This includes appropriate state and local agencies as well as grazing permittees and land users." Coordination with stakeholders before management changes occur on both specially designated areas and undesignated areas will assist in the overall long-term success of forest management and planning.
Preliminary Draft Forest Plan	Ch. 3 Designated Areas – Recommended Wilderness – Desired Conditions	132	31-32	NMDA requests this Desired Condition be edited to state, "Recommended wilderness areas are managed to protect and enhance the wilderness character that exists at the time of recommendation while also maintaining existing multiple uses of the forest." NMDA understands that USFS is required to protect recommended wilderness areas; however, sustainable grazing management and access should be maintained in current grazing allotments to fulfil the multiple-use and sustained yield.

Document Reviewed (draft plan, wilderness process paper, map)	Resource Section	Page No.	Line No.	Comment
Preliminary Draft Forest Plan	Ch. 3 Designated Areas – Recommended Wilderness – Standards	132 133	34-40 1-2	NMDA requests the two standards listed for this section also be added to the "Designated Wilderness - Standards" section on pages 130-131.
Preliminary Draft Forest Plan	Ch. 3 Designated Areas – Recommended Wilderness – Guidelines	133	3	NMDA requests an additional Guideline be added to this section that discusses permitted restoration activities. Prescribed fire and noxious weed treatment is addressed but not other restoration activities (such as bank stabilization, etc.).
Preliminary Draft Forest Plan	Ch. 3 Designated Areas – Recommended Wilderness – Guidelines	133	13-18	NMDA requests the two guidelines listed in the lines indicated (relating to grazing) also be added to the "Designated Wilderness - Guidelines" subsection on page 131.
Preliminary Draft Forest Plan	Ch. 3 Designated Areas – Inventoried Roadless Areas	134	11	NMDA requests a citation on the claim that Inventoried Roadless Areas "provide clean drinking water" as described on the indicated lines. Without scientific substantiation, this claim should be removed from the Preliminary Plan.
Preliminary Draft Forest Plan	Ch. 3 Designated Areas – Eligible Wild and Scenic Rivers	136- 138	All	NMOSE is charged with administering New Mexico's water resources. NMDA requests the Desired Conditions, Standards, Guidelines, and Management Approaches be more clearly described to ensure that USFS is working within the laws and policies of both USFS and NMOSE.
Preliminary Draft Forest Plan	Ch. 3 Designated Areas – Eligible Wild and Scenic Rivers – Background and Description	136- 137	34-39; 1-8	NMDA requests the descriptions of the outstandingly remarkable values and preliminary classifications for the seven eligible wild and scenic rivers be provided either within the Preliminary Plan or as a citation to the "Wild and Scenic River Eligibility Process."

Document Reviewed (draft plan, wilderness process paper, map)	Resource Section	Page No.	Line No.	Comment
Preliminary Draft Forest Plan	Ch. 3 Designated Areas – Eligible Wild and Scenic Rivers – Standards	137	23-26	How will the “free-flowing character of an eligible wild and scenic river segment” be determined? The “Wild and Scenic River Eligibility Process” paper does not provide the baseline flows of eligible wild and scenic rivers. NMDA requests this important information be determined and scientifically documented in order to appropriately manage these areas.
Preliminary Draft Forest Plan	Ch. 3 Designated Areas – Scenic Byways – Background and Description	139	33	NMDA requests that maps be provided for all the scenic byways within the forest. These could be placed in this section or as an appendix.
Preliminary Draft Forest Plan	Ch. 3 Designated Areas – Several Sections	140-143		The National Historic Landmark, Critical Habitat for Threatened and Endangered Species, Department of Defense Kirtland Air Force Base Withdrawal, Langmuir Research Site and Magdalena Ridge Observatory, and T’uf Shur Bien Preservation Trust Area sections don’t have objectives, standards, guidelines, management approaches, etc. NMDA requests these sections be developed in the next version of the Preliminary Plan or that placeholders be included.
Preliminary Draft Forest Plan	Ch. 5 Introduction	145	10-12	NMDA looks forward to being involved in the collaborative development of the monitoring program for the Preliminary Plan.
Preliminary Draft Forest Plan	Appendix D	187	1-34	This entire page seems out of place. NMDA requests the contents of this page either be removed entirely from the Appendix, be moved to the “Process Paper on the Inventory and Evaluation of Lands that may be Suitable for Inclusion in the National Wilderness Preservation System,” or be moved to some other more appropriate section of the Preliminary Plan.

Preliminary Draft Forest Plan Alternatives and Maps

General Comments

Table 231, “Comparison of Alternatives”

Appendix D of the Preliminary Plan contains the “Proposed Management Areas and Draft Alternatives.” Appendix D, Table 231, “Comparison of Alternatives,” has a bulleted summary of the differences between each alternative. The first bullet for Alternatives B through E all state, “Remove all Management Areas from 1985 Plan.” This statement is confusing because a few bullets below these same alternatives have a summary bullet that states, “Retain All Designated Areas from 1985 Plan, including Wilderness.” NMDA requests that more accurate summary statements be provided in this table that demonstrate the intent of the Cibola NF in maintaining or removing management areas.

Alternatives Discussion

Alternative A is the “No Action” alternative, which would maintain existing 1985 Forest Plan Management Areas and Designated Areas with no changes. NMDA does not believe this is a prudent alternative to select. Land uses, scientific information, and public priorities have changed since the 1985 Forest Plan and the new Forest Plan should reflect current issues and opportunities that exist in the Cibola NF.

NMDA does not support Alternatives B, D, or E in their current forms because of the highly restrictive land management approaches that come with recommending wilderness. Lands identified as potentially suitable for wilderness under this process would be managed under the Nonimpairment Policy (36 CFR 219.10 (b) (iv)) and would result in greatly reduced access for resource management and multiple use. This nonimpairment policy extends the protection of congressionally designated wilderness areas to recommended wilderness areas identified in this process. NMDA is opposed to recommending any areas to include in the National Wilderness Preservation System because of the land management restrictions that accompany such a recommendation.

Further, NMDA does not support Alternatives B, D, or E in their current forms because of the unpredictable and currently undocumented management approaches that will accompany designating Special Management Areas (SMAs). While NMDA understands the intent of designating the various SMAs, we do not believe that specifically identifying geographically distinct areas and trying to manage those areas differently from the rest of the Cibola NF is a prudent path forward. In fact, NMDA supports the *intent* of preserving the values of several SMAs such as the focus on restoration activities and the opening of grazing allotments. However, NMDA asserts that each of the values that are desired to be protected by designating areas as SMAs can be protected within Chapter 2, “Forest Wide Plan Components and Management Approaches,” of the Preliminary Plan.

For example, an SMA that is proposed to specifically protect a rock climbing area can simply be provided special standards, guidelines, and management approaches within the Preliminary Plan’s Recreation chapter and not as a separate management section. Additionally, NMDA is concerned that by designating SMAs, the future management of these areas will not be predictable for forest users. There is more room for misinterpretation of the intended management approaches that will accompany proposed SMAs than there would be if the same areas were given specific standards, guidelines, management approaches, etc., within Chapter 2 of the Preliminary Plan. Finally, several of the proposed SMAs in various alternatives give priority to some multiple uses over others. NMDA asserts that

existing permitted uses should not be infringed upon or put at a lesser priority in order to manage an area for one particular value.

NMDA does not support Alternative C in its current form. Even though this alternative does not contain any recommended wilderness areas or SMAs, it does not provide for the opening of the Gross Kelly Grazing Allotment in the Mountainair Ranger District (RD) or the Communal Grazing Pastures in the Sandia RD.

Because NMDA (1) does not support recommending additional wilderness areas to the Preliminary Plan, (2) believes the values that are intended to be protected by SMAs can be protected with specific guidance within the forest-wide management, and (3) supports the addition of the communal grazing pastures in the Sandia RD and the opening of the Gross Kelly Allotment in the Mountainair RD, NMDA puts forth a new alternative for consideration. Please see our “NMDA’s Suggested New Alternative” section below for more detail.

Alternatives Maps Issues

As discussed below in “Phase 3 Wilderness Inventory and Areas with Wilderness Character Maps” section below, several polygons with wilderness character need to be corrected.

Polygon D4_ADJ2 was only determined to have wilderness character in the southern portion of the polygon. The maps for Alternatives D and E both show the entirety of the polygon as Recommended Wilderness areas. NMDA requests these Alternative Maps be changed to reflect the intention of the Landscape Team, the Interdisciplinary Team (IDT), and the Steering Committee.

Polygon D3_5K7 was only determined to have wilderness character in the western portion of the polygon. The map for Alternative E seems to show the entirety of the polygon as a Recommended Wilderness area. NMDA requests this Alternative Map be double checked to ensure that only areas determined to have wilderness character are reflected as such on this map.

Polygon D3_5K7.b was only determined to have wilderness character in the eastern portion of the polygon. The map for Alternative E seems to show the entirety of the polygon as a Recommended Wilderness area. NMDA requests this Alternative Map be double checked to ensure that only areas determined to have wilderness character are reflected as such on this map.

The Cibola NF IDT found that polygons D3_ADJ3.c, D3_ADJ3.d, D3_ADJ3.f, D3_ADJ3.h, and D3_ADJ3.i do not have wilderness character based on the criteria used. The Evaluation Narrative states the Steering Committee determined these polygons do have wilderness character; however, the only reasoning provided for this determination is “due to individual finding criteria.” NMDA requests a more thorough description on why the Steering Committee’s decision defers from the IDT finding. If warranted, NMDA requests these polygons be removed from being an area recommended for wilderness for Alternative E for the Magdalena RD.

NMDA’s Proposed New Alternative

NMDA would like to put forth and support a new alternative. NMDA’s proposed new alternative adheres to the four core themes of the Preliminary Plan. However, no SMAs or recommended wilderness areas are proposed in this new alternative. This alternative suggests the values that are intended to be preserved through the designation of SMAs (as proposed in the other alternatives) can be

preserved through appropriate standards, guidelines, and management approaches within Chapter 2, “Forest Wide Plan Components and Management Approaches,” of the Preliminary Plan.

NMDA would like to build upon the proposed SMA values relating to the opening of grazing pastures proposed in Alternatives B, D, and E without actually designating these areas as SMAs. The map of this alternative would look exactly like that of Alternative C with the new grazing pastures labeled (but, again, not designated as SMAs) to indicate a change in land use. The Range and Grazing section within Chapter 2 of the Preliminary Plan would need to be updated to reflect the allowance of grazing in the following areas (as described in Alternatives B, D, and E):

- Sandia RD
 - Area in northeast portion of Sandia RD and another area south of I-40 and west of Highway 337.
 - Restore historical communal grazing boundaries of the Cedro (Canon de Carnual) Land Grant, Santa Antonio de Las Huertas Land Grant, and San Pedro Land Grant.
- Mountainair RD
 - Gross Kelly Communal Grazing Allotment.

Process Paper on Inventory and Evaluation of Lands That May Be Suitable for Inclusion in the National Wilderness Preservation System

NMDA appreciates the opportunity to be involved in the inventory and evaluation process of identifying lands that may be suitable for inclusion in the National Wilderness Preservation System.

Evaluation Narratives for Inventory and Evaluation of Lands That May Be Suitable for Inclusion in the National Wilderness Preservation System

The “Evaluation Narratives for Inventory and Evaluation of Lands That May Be Suitable for Inclusion in the National Wilderness Preservation System” (Evaluation Narratives) provides a list of IDT and Landscape Team members that were present during each of the team meetings to discuss polygons. NMDA requests these lists be double checked to ensure they accurately reflect who was present at these meetings.

Mt. Taylor RD Evaluation Narratives

No comment.

Mountainair RD Evaluation Narratives

No comment.

Magdalena RD Evaluation Narratives

The Wilderness Findings and Summary Table for D3_ADJ2 on page 8 of the Evaluation Narratives includes the IDT Findings. However, this table incorrectly includes the Steering Committee decision for an entirely different polygon (D3_5K10). NMDA requests this error be corrected so this document provides an accurate account of how decisions were made in the Inventory and Evaluation process.

The combined Wilderness Findings and Summary Table for D3_5K7.c, D3_5K7.d, and D3_5K7.f do not accurately reflect the findings of the IDT or the discussions that were recorded in the evaluation narratives. For instance, where some findings were recorded as “Low,” they should have been recorded as “Moderate” or “High.” NMDA requests this error be corrected so this document provides an accurate account of how decisions were made in the Inventory and Evaluation process.

The Evaluation Narrative for polygon D3_ADJ3.c, D3_ADJ3.d, D3_ADJ3.f, D3_ADJ3.h, and D3_ADJ3.i indicate the IDT found these polygons do not have wilderness character based on the criteria used. The Evaluation Narrative then states the Steering Committee determined these polygons do have wilderness character; however, the only reasoning provided for this determination is “due to individual finding criteria.” NMDA requests a more thorough description on why the Steering Committee’s decision differs from the IDT finding.

Sandia RD Evaluation Narratives

No comments.

Phase 3 Wilderness Inventory and Areas with Wilderness Character Maps

Mt. Taylor RD Maps

No comments.

Mountainair RD Maps

Polygon D4_ADJ2 shows the entirety of the polygon is an area with wilderness character. According to the “Evaluation Narratives for Inventory and Evaluation of Lands That May Be Suitable for Inclusion in the National Wilderness Preservation System,” only the southern portion of the polygon should be labeled as having wilderness character. NMDA requests the “Phase 3 Wilderness Inventory and Areas with Wilderness Character Maps” be changed accordingly.

Magdalena RD Maps

Polygon D3_5K7 shows a large area as having wilderness character. According to the “Evaluation Narratives for Inventory and Evaluation of Lands That May Be Suitable for Inclusion in the National Wilderness Preservation System,” only the western portion of the polygon should be labeled as having wilderness character. NMDA requests the map for this polygon be double checked to ensure that only the correct areas with wilderness character be shown as such.

Polygon D3_5K7.b shows a large area as having wilderness character. According to the “Evaluation Narratives for Inventory and Evaluation of Lands That May Be Suitable for Inclusion in the National Wilderness Preservation System,” only the eastern portion of the polygon should be labeled as having wilderness character. NMDA requests the map for this polygon be double checked to ensure that only the correct areas with wilderness character be shown as such.

As discussed above, the IDT found that polygons D3_ADJ3.c, D3_ADJ3.d, D3_ADJ3.f, D3_ADJ3.h, and D3_ADJ3.i do not have wilderness character based on the criteria used. The Evaluation Narrative states the Steering Committee determined these polygons do have wilderness character; however, the only reasoning provided for this determination is “due to individual finding criteria.” NMDA requests a more thorough description on why the Steering Committee’s decision differs from the IDT finding. If warranted, NMDA requests these polygons be removed from the map of polygons with wilderness character.

Sandia RD Maps

No comments.

Process Paper on Wild and Scenic River Eligibility

The “Wild and Scenic River Eligibility Process” paper provides valuable information on how eligibility was determined for the wild and scenic rivers identified in the Preliminary Plan. As also mentioned in

NMDA's comment form above, we request the explanations of the outstandingly remarkable values for each eligible wild and scenic river segment be provided either within the Preliminary Plan in the Eligible Wild and Scenic Rivers section of Chapter 3, "Management Areas and Designated Areas" or as a citation within that same section.

An important piece of information is missing from the "Wild and Scenic River Eligibility Process" paper. Under "Step 5: Identify free-flowing named streams," the citation for flow qualifications, footnote #5, is missing at the bottom of the page. NMDA requests that this important information be provided. Also, as noted in NMDA's comment form above, we request that baseline water flows be determined and documented in the "Wild and Scenic River Eligibility Process" paper as well as in the Preliminary Plan in order to ensure proper management of these areas.

Eligible Wild and Scenic River Maps

NMDA requests the maps provided for the eligible wild and scenic rivers be accompanied by map insets that show the location of each river segment at a smaller, ranger district scale. Providing these insets will provide the spatial context of where river segments are located within each ranger district to map users.

Scenery Management System Inventory Maps

No comments.

Recreation Opportunity Spectrum Inventory Maps

No comments.

At-Risk Species Determination Process and Rationale Document

The Federally Recognized Species on the Cibola section on the first page of this document states, "There are four federally endangered, three threatened, and two proposed species on the plan." However, this sentence's cited table (Table 1) lists five endangered species, four threatened species, and no candidate species. NMDA requests that Table 1 be reviewed and edited to reflect the accurate number of federally listed threatened, endangered, and candidate species for the planning area.

Page 5 of this document lists the sources used to compile the best available science for the at-risk species determination process. One cited source is "species identified as those of greatest conservation need by the New Mexico Comprehensive Wildlife Conservation Strategy (NMDGF 2006)." NMDGF has been in the process of revising the Comprehensive Wildlife Conservation Strategy (CWCS). NMDA suggests that Cibola NF review the updated CWCS once it is finalized for accuracy within the Preliminary Plan.