



**DEPARTMENT OF AGRICULTURE  
STATE OF NEW MEXICO**

**MSC 3189, Box 30005  
Las Cruces, New Mexico 88003-8005  
Telephone (575) 646-3007**

**MICHELLE LUJAN GRISHAM**  
*Governor*

**JEFF M. WITTE**  
*Secretary*

May 26, 2020

Mr. Joshua Hall  
Ecosystem Staff Officer  
Santa Fe National Forest  
11 Forest Lane  
Santa Fe, NM 87508

Dear Mr. Hall:

New Mexico Department of Agriculture (NMDA) submits the following comments to the United States Forest Service (Forest Service) in response to the draft Environmental Assessment for the Northern New Mexico Riparian, Aquatic, and Wetland Restoration Project (EA).

Part of NMDA's role is to advocate proactively on behalf of New Mexico's agricultural communities and the natural resources that sustain them. This includes providing comment on resource management plans that impact the ecological health and economic use of New Mexico's public lands.

The Multiple-Use Sustained-Yield Act of 1960 and National Forest Management Act of 1976 mandate the Forest Service administer national forest land for multiple uses, including livestock grazing. In a state where the Forest Service manages over nine million acres, reliable access to public rangeland is critical for New Mexico's livestock producers. Since around 82 percent of ranches in northern New Mexico are classified as small, family-owned operations, even small changes to public land management have a large impact on individual producers.<sup>1</sup> For many towns surrounding the Carson, Cibola, and Santa Fe national forests, ranching provides the economic bedrock and cultural identity of the community.

In recognition of the need to support rural communities while restoring northern New Mexico's watersheds, NMDA provides the following comments on how the Forest Service's EA can be modified to minimize the burden to livestock producers and maximize the ecological benefits to riparian, aquatic, and wetlands areas.

---

<sup>1</sup> McSweeney, Alice M.; Raish, Carol. 2012. *Social, cultural, and economic aspects of livestock ranching on the Santa Fe and Carson National Forests*. Gen. Tech. Rep. RMRS-GTR-276. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 199 p.

### **Role of Livestock Grazing in Supporting Ecosystem Services**

As the draft land management plan for the Santa Fe National Forest notes, “Livestock grazing today plays an essential role in providing ecosystem services” (Santa Fe National Forest Draft Land Management Plan, page 75). These ecological benefits include invasive plant control, reduction of fine fuels, and soil aeration, all of which support healthy riparian ecosystems. The EA correctly acknowledges that riparian degradation from livestock overuse is the result of legacy impacts, not a reflection of current practices (EA, page 26). As noted in the draft land management plans for all three national forests, Forest Service policy now requires adaptive livestock management, which is responsive to environmental conditions and contains extra protections for riparian management zones.

Therefore, NMDA proposes the following changes to language in the EA:

On page 2, “grazing” is listed as a stressor to riparian, aquatic, and wetland areas. This should be changed to “improperly managed grazing” in recognition that properly managed grazing practices are consistent with healthy ecosystems.

On page 102, the Forest Service writes that “Past and present **agriculture**, water development, transportation, utility rights-of-way, **ranching**, and **grazing** in the watersheds have likely affected cultural resources through direct impacts or degradation of resource values.” This sentence burdens agricultural activities three times with the responsibility for degraded resource values. Instead, it should be simplified to identify “improperly managed grazing” as a cause of degradation rather than “Past and present agriculture,” “ranching,” and “grazing in the watersheds.”

### **Consultation, Coordination, and Cooperation with Grazing Permittees**

NMDA requests that the Forest Service always consult, coordinate, and cooperate with permittees over actions that affect their grazing allotments. While short-term impacts from projects may seem “dispersed and localized” to the national forest as a whole, such changes can have a major impact on individual livestock producers. Consultation and cooperation not only build trust between forest managers and affected permittees but can also enhance the effectiveness of restoration efforts. Permittees have years of first-hand experience on their allotments; since small environmental changes can have a large bearing on their livelihood, their observations on the state of vegetation and water resources can be a wealth of knowledge for watershed planning.

To ensure such cooperation occurs, NMDA recommends adding the following design criteria to the Technical Skill and Planning Requirements under General Aquatic Conservation Measures (Appendix B, page B-3):

- d) Planning and design includes consultation, coordination, and cooperation with livestock grazing permittees within the project area. This consultation will include efforts to minimize project disruption to livestock production while achieving restoration objectives.

### **Decommissioning of Roads**

NMDA urges caution with the decommissioning of roads since ongoing efforts to restore proper watershed function through forest thinning and proactive riparian restoration require access. Such decisions should try to maintain flexibility in consideration of future project needs.

Road access is also crucial to a livestock producer's ability to practice proper grazing techniques in riparian areas and efficiently respond to the needs of adaptive management. As such, permittees should be included in any discussion over the decommissioning of roads in order to find workable alternatives. NMDA supports the EA's allowance that permittees be allowed to use decommissioned roads for administrative purposes but requests the following changes to the text of the EA to minimize the disruption of proper grazing practices:

1. On page 78, the EA states, "Decommissioning of roads would not have impacts, as existing roads may be made a part of the term grazing permit and made available to permittees for administrative purposes." NMDA requests that "may" be changed to "will" to assure permittees that this will be a required Forest Service policy.
2. NMDA requests the EA include assurances that such decommissioned roads will be maintained at a basic level to provide access for administrative purposes, including livestock management. As stated, the maintenance requirements of these roads are unclear.

### **Fencing and Exclusion of Grazing from Riparian Areas**

While temporary fencing may be necessary during project implementation, permanent enclosures within riparian areas and wetlands should be avoided whenever possible. Overreliance on fenced enclosures fractures landscape connectivity, cuts off wildlife access to critical water sources, and imposes additional burdens on permittees. NMDA urges the Forest Service to consult with permittees on management alternatives to permanent fencing and cost-sharing arrangements for infrastructure.

Wherever exclusionary fencing is installed, the Forest Service must proactively consult with permittees on the development of alternative water access for livestock and wildlife. As the Forest Service itself acknowledges, "The sustainability of these fragile ranch economies depends on the availability of both water and productive land."<sup>2</sup> Replacing excluded water sources is necessary to prevent an overconcentration of impacts in other riparian areas and disperse livestock and wildlife across the landscape. Consultation with permittees will ensure that new water infrastructure fits on-the-ground grazing practices and provide the maximum ecological benefit.

---

<sup>2</sup> McSweeney & Raish (2012).

Mr. Joshua Hall  
Northern New Mexico Riparian, Aquatic, and Wetland Restoration Project  
Page 4  
May 26, 2020

**Conclusion**

NMDA welcomes the renewed efforts by the Forest Service to restore northern New Mexico's watersheds. In implementing these projects, however, the Forest Service should work closely with permittees to ensure that any negative impacts to livestock production are minimized.

If there are any questions related to these comments, please contact Mr. Max Henkels at (575) 339-5052 or [mhenkels@nmda.nmsu.edu](mailto:mhenkels@nmda.nmsu.edu).

Sincerely,

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

Jeff M. Witte

JMW/mh/ya