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RIO GRANDE DISTRICT
14 JUL 2016 PH121

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District Ranger
NMNJM Sacramento EA
Sacramento Ranger District
4 Lost Lodge Road
Cloudcroft, N.M. 88317

60317-932604

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July 13, 2018

David Heft

[REDACTED]

District Ranger
Sacramento Ranger District
Lincoln National Forest
4 Lost Lodge Road
Cloudcroft, N.M. 88317

Re: NMMJM Sacramento EA

Dear Ms. Humphrey;

I would like to make several comments regarding the proposed action for the proposal to install permanent fencing for the benefit of the New Mexico Meadow Jumping Mouse and its' designated critical habitat on the Sacramento grazing allotment.

I would highly recommend that the District install all pipe and elk proof fencing initially for the project and not install any barbed wire fences even if the intent is to later replace them with other types of fencing. The District already has far too many range improvements, particularly barbed wire fences, in a state of total disrepair and non-functioning. Barbed wire fencing is a detriment to wildlife due to entanglement issues and a serious hindrance to recreational users. It also requires a huge investment in time and materials to attempt to maintain in light of the current elk population on the District.

I would also comment that any type of grazing management based on "utilization monitoring during the height of the growing season is not a true indicator of the actual utilization. August is normally the wettest month of the year for New Mexico with vegetative growth at its' peak. My observations in the Wills Canyon area this spring showed far higher utilization levels primarily due to elk use. Utilization monitoring done just prior to the livestock grazing season would be a far better indicator of the impacts to NMMJM habitat. I would like to note that in 2002 the New Mexico Department of Game and Fish had a Sacramento unit population goal of 1,000 elk with approximately half of those animals on U.S. Forest Service lands. The actual population at that time was estimated at 3,000. Today we have an estimated 6,000 plus elk on the unit with half of those on Forest Service lands. These animals have no grazing control. In 40 years of observing the Sacramento District I have seen the health of the land and particularly the higher elevation meadows seriously and noticeably decline.

I would also comment that the discussion of impacts to Mexican Spotted Owl and MSO habitat does not seem to support the "adversely affect" finding. The major potential disturbance to MSO in these areas is motorized recreational use and not routine range improvement maintenance.

I make the same comment regarding the finding of "adversely affect" for the NMMJM and it's designated critical habitat. The impacts discussion itself does not support that finding. It makes no biological sense nor does it conform to common sense to design a project to benefit a species and it's habitat and then say the project as designed will have an adverse effect on that species and it's habitat. Any detrimental impacts can be mitigated by project design and timing restrictions to avoid an "adverse effect" finding.

In general, I support the goals of the project but it is a bandaid approach and does not address the primary causes of the current situation. The U.S. Forest Service's failure to address the significant increase in woody encroachment into meadow and riparian areas, excessive motorized recreational use in key wildlife habitats, and the failure to stand up to the State wildlife agency on the elk issue are the root problems. I remind the agency that the U.S. Supreme Court in a case originating here in New Mexico found that Federal land management agencies had full legal authority to reduce wild ungulate populations causing damage to lands under their management.

Thank you,

David L. Heft