

UPPER HONDO SOIL & WATER CONSERVATION DISTRICT

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July 27, 2018

Lincoln National Forest – Sacramento Ranger District
Attn: Aurora Roemmich – auroraroemmich@fs.fed.us

RE: New Mexico Meadow Jumping Mouse Habitat Improvement Project on the Sacramento Grazing Allotment
Lincoln National Forest Sacramento Ranger District

Thank you for the opportunity to comment on the above referenced EA.

First, the USFS is placing livestock grazing with the sole blame for the Meadow Jumping Mouse listing and habitat loss. Over 100 years of recorded livestock and the continued presence of the MJM should indicate that livestock may not be the main problem.

The exclusion of fire and past management by the USFS has allowed woody vegetation to get so thick (dense) that grass and herbaceous vegetation has been eliminated over many acres of the Sacramento Allotment. This reduction in grazable grasses has forced permitted livestock into smaller and smaller acreage, primarily in the meadows and drainages.

The analysis included in the EA appears to be lacking in several areas. Specifically;

1. Effect of elk and other wildlife species that will graze the area, both within and outside the exclosures. Further analysis needs to determine short and long term impacts.
2. Soils – Trails along the outside perimeter of the exclosures created by wildlife and livestock have the potential to channel run-off and create 'new' gully erosion. No consideration for this was found in the document.
3. Socio/Economic Analysis, the changes to management of the permitted livestock being required by the grazing permittee due to the proposed actions appears to be conceived by individuals that do not or have not managed livestock. The additional livestock requirements and the maintenance of proposed pipelines, troughs and storage tanks will be an economic burden on the grazing permittee. Include a cost/benefit analysis.
4. Who will be responsible for maintenance of the exclosure fences?
5. More analysis of fence design and location of exclosures appears to be needed to match primary constituent elements.

The Upper Hondo Soil and Water Conservation District recommends this project be delayed pending further analysis of scientific data.

Respectfully submitted at the direction of and with the authority of the UHSWCD Board of Supervisors,
BY:


Laura Johnson
Program Coordinator