



**South Central Mountain
RC&D COUNCIL**
SCMRCD.ORG
201 Oak Grove Place
Ruidoso, NM 88345
(575) 446-3973 Fax: (844) 687-1455
www.scmrred.org

South Central Mountain RC&D, Inc.

Laura Doth, Executive Director • Rick Merrick, Rural Community Forester

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November 4, 2021

Lincoln National Forest
Forest Plan Revision
3463 Las Palomas Rd
Alamogordo, NM 88310

To Whom It May Concern:

Thank you for the opportunity to comment on the proposed Lincoln National Forest Plan Revision. The South Central Mountain Resource Conservation & Development Council has been actively working in Lincoln and Otero Counties since 1968. Our purpose has been to complete projects that create healthy forests and improve the quality of life for area residents.

Attached you will find detailed comments and the rational behind those comments for the proposed Lincoln National Forest Plan Revision. We would appreciate your careful consideration of these comments.

Our biggest concern is the expansion of the wilderness areas within the Lincoln National Forest. The majority of the identified areas do not meet the strict definitions for qualifying as wilderness.

- Many of these areas are range allotments containing fences, livestock pens, windmills, roads, etc. to support livestock grazing with a defined human presence.
- The plan has used "creative" mapping in these areas to claim these areas are roadless. However, "Cherry Stemming" roads and private land holdings do not make these areas roadless.
- In fact, Appendix B identified many of these areas with both non-motorized and motorized roads indicating a significant human presence.
- Appendix B also identified areas that would have to be modified, human improvements removed, in order to be classified as a wilderness.
- If areas with range allotments were made into wilderness this would make it almost impossible for the Forest Service and permittees to realize the benefits of the Adaptive Management processes promoted by this plan.
- Making these areas wilderness areas does not recognize or the economic, social economic, cultural uses, and fire prevention tactics of the multi-use lands.

We appreciate your consideration.

Sincerely,

Laura Doth
Executive Director

SCM RC&D Council - Lincoln National Forest Draft Plan Comments

Page	Chapter	Section	Comment	Reason
Lincoln National Forest Draft Plan				
3	1 - Introduction	Purpose of the Land Management Plan	In the first paragraph on page 3, change the 3rd sentence to read "Priorities evolve and are reassessed continually by Lincoln National Forest leadership in collaboration with other Federal Agencies, state and local governments, the public and other non-government agencies."	Change adds specificity by identifying major stakeholders.
9	1 - Introduction	Purpose of the Land Management Plan	In the first bullet at the top of the page, add "South Central Mountain Resource Conservation District and, Soil & Water Conservation Districts" to the list of partnerships.	Change adds specificity by identifying major stakeholders.
10	1 - Introduction	Soil Resources	In the first bullet at the top of the page, add "Recognizing the effects of weather, i.e. drought, has on soil conditions."	The amount of moisture in the soil is a major factor in the amount of organic matter it contains and it's ultimate condition.
10	1 - Introduction	Watershed and Water Resources	In the second bullet in this section, change the sentence to read, "There is a need for plan components to address water quality in addition to supply, including partnerships with private landowners, downstream users, local and state government entities, and the New Mexico Environment Department."	Identifies all major stakeholders.
11	1 - Introduction	At-Risk Species	In the 3rd bullet of this section change the sentence to read, "...working with local governments and neighboring land managers to..."	Identifies all major stakeholders.
11	1 - Introduction	Social and Economic Conditions, and Multiple Uses	In the 2nd bullet of this section add the "Smokey Bear Collaborative" to the list of groups	Identifies a major private-public partnership.
12	1 - Introduction	Cultural and Historic Resources	Add a new bullet to this section, "There is a need for plan components to recognize and support the social-economic benefits local and state governments realize with the existence of the Lincoln National Forest."	
12	1 - Introduction	Recreation and Scenic Character	At the end of the 2nd bullet add the "... resources, while maintaining the multi-use aspect of the forest."	
13	1 - Introduction	Designate Areas	In the bullet for this section add "critical habitat areas" in the list of special areas.	Critical habitat areas classification is significant designation and needs to continually re-evaluated to ensure its needed, adapted to changing environmental conditional, and is accomplishing what it was intended purpose.
16	1 - Introduction	Land Management Plan Implementation	Change the 1st sentence in the 2nd paragraph to read, "Lincoln National Forest projects and activities are to be consistent with the direction in this plan, Environmental Impact Statement and compliant with current law, regulation, policy, and private property rights for adjoining lands."	
17	1 - Introduction	Interrelationships of Land Management Plan Content	Add "...resources, consistent with the EIS." to the last sentence in the 2nd paragraph.	
19	1 - Introduction	Amendments	Change the last sentence to read, "State and local governments, major stakeholders, and the public will be notified of all administrative changes to the land management plan."	

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19	1 - Introduction	Adaptive Planning and Monitoring	Change the last sentence of the 3rd bullet to read, "Learning is proactively shared and coordinated with the public, tribal government and nongovernment stakeholders."	
21	2 - Forest wide Management Direction	Introduction	In the last sentence change "climate regulation" to "Climate change" and change "...cultural, and recreational experiences..." to "...cultural, economic, and recreational experiences..."	
61	2 - Forest wide Management Direction	Water Resources Objectives	Add the following to the list of Desired Objectives, "Accomplish vegetation treatments to protect and improve surface and underground water resources."	
62	2 - Forest wide Management Direction	Wildlife, Fish, and Plants	Insert the following paragraph at the beginning of this section, "Ecological restoration is an outcome of managing for desired conditions and may be necessary in degraded ecosystems. Restoration is an intentional activity that initiates or accelerates ecosystem recovery with respect to its health (functional process and productivity), integrity (species composition and community structure), and sustainability (resistance and resilience to disturbance) under current and future conditions. Restoration may not necessarily return an ecosystem to its former state, because contemporary constraints and conditions can alter the trajectory of an ecosystem's development."	Add consistency between the introduction and this section.
67	2 - Forest wide Management Direction	Terrestrial Species and Habitats Management Approaches	Add the following items to the list of considerations, "07 Projects should consider traditional cultural and social-economic benefits of these species."	
71	2 - Forest wide Management Direction	Aquatic Species and Habitat Management Approaches	Add the following items to the list of considerations, "05 Projects should consider traditional cultural and social-economic benefits of these species."	
73	2 - Forest wide Management Direction	At-Risk Species Management Approaches	Add the following to the end of #06 of items considered, "...enhance species and their habitat while balancing traditional cultural and social-economic forest activities.	
76	2 - Forest wide Management Direction	Nonnative Invasive Management Approaches	Add the following to the list of management approaches, " 04 Coordinate and collaborate with state, local and federal agencies, nonprofit organizations, other specialists, tribes, and adjacent land owners in reducing and spread of nonnative invasive species on a landscape scale."	
82	2 - Forest wide Management Direction	Fire and Fuels Management Approaches	Add the following to the list of management approaches, " 13 Coordinate and collaborate with state, local and federal agencies, nonprofit organizations, other specialists, tribes, and adjacent land owners with application of vegetation treatments in order to reduce the number and spread of unplanned wildfire on a landscape scale."	
93	2 - Forest wide Management Direction	Forest Products Management Approaches	Add the following to the list of management approaches, " 03 Coordinate and collaborate with state, local and federal agencies, nonprofit organizations, other specialists, tribes, and adjacent land owners with application of vegetation treatments that promote the health and economic use for vital forest products on a landscape scale."	
112	2 - Forest wide Management Direction	Scenery Resources Desired Conditions	Add the follow to the list of desired conditions, "Eliminate illegal dump sites."	

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Page	Chapter	Section	Comment	Reason
114	2 - Forest wide Management Direction	Scenery Resources Management Approaches	Add the following to the list of management approaches, "08 Design practices that eliminate, prosecute and prevent illegal dumping on the Lincoln National Forest. 09 Coordinate and collaborate with other federal, state and local law enforcement agencies to identify and prosecute illegal dumping activities."	
115	2 - Forest wide Management Direction	Roads Objectives	Add the following to the list of objectives, "03 Continually identify, close and decommission illegal, user created roads. 04 Review and update the Lincoln National Forest Traffic Plan every 5 years."	
116	2 - Forest wide Management Direction	Roads Management Approaches	Add the following to the list of management approaches "05 Educate the public on the problems and issues associated with illegal roads."	
120	2 - Forest wide Management Direction	Lands and Access Desired Conditions	Add the following to the end of #04, "...and recreation access) while preserving and protecting private landowner private-property rights."	Recognizing and preserving individual private property rights is a fundamental legal principle in the United States.
120	2 - Forest wide Management Direction	Lands and Access Desired Conditions	Add the following to the end of #05, "...recreation opportunities while preserving and protecting private landowner private-property rights."	Recognizing and preserving individual private property rights is a fundamental legal principle in the United States.
120	2 - Forest wide Management Direction	Lands and Access Guidelines	Change item 01 to read, "Rights-of-way for roads, utilities, and communications sites will maximize use of existing..."	
120	2 - Forest wide Management Direction	Lands and Access Guidelines	Change item 02 to read, "...within Lincoln National Forest boundary may be recommended for acquisition."	
120	2 - Forest wide Management Direction	Lands and Access Guidelines	Change item 03 to read, "Rights-of-way may be acquired by purchase or donation."	Many of the private lands located within and adjacent to the forest were established long before the Lincoln National Forest came into existence. Recognizing and preserving individual private property rights is a fundamental legal principle in the United States.
120	2 - Forest wide Management Direction	Lands and Access Guidelines	Change item 04 to read, "Land exchanges may be recommended under the following conditions..."	
121	2 - Forest wide Management Direction	Lands and Access Guidelines	Change item 07 to read, "Special use authorizations for access to private property through National Forest System lands may not be granted unless the applicant has proven there is no other means of access."	Private property owners cannot be locked out of their property holding.
121	2 - Forest wide Management Direction	Lands and Access Management Approach	Change item 01 to read, "Consider encourage the protection of existing public access rights and the acquisition of public access opportunities to National forest System lands while respecting and protecting private property rights of individual adjacent landowners."	Recognizing and preserving individual private property rights is a fundamental legal principle in the United States.

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Page	Chapter	Section	Comment	Reason
122	2 - Forest wide Management Direction	Transmission Corridors - Lands Special Uses Desired Conditions	Add the following to the list, "06 Transmission corridors will not be a source for wildfires."	See recent catastrophic California wildfires.
123	2 - Forest wide Management Direction	Lands Special Uses Guidelines	Add the following to the list, "12 New transmission corridors will be built of sufficient size and maintained to eliminate the possibility a source of wildfires.	
132	2 - Forest wide Management Direction	Renewable Energy Guidelines	Change item 01 to read, "Special use authorization will include provisions...".	
132	2 - Forest wide Management Direction	Renewable Energy Guidelines	Change item 02 to read, "New energy developments and energy corridors will be located to minimize...".	
132	2 - Forest wide Management Direction	Renewable Energy Guidelines	Change item 03 to read, "Installation or replacement of renewable energy structures under special use authorization will include raptor protection...".	
132	2 - Forest wide Management Direction	Renewable Energy Guidelines	Change item 04 to read, "Constructed features will be maintained to support the purposes(s) for which they were built. Constructed features will be removed when no longer needed."	
132	Forest wide Management Direction	Renewable Energy Guidelines	Change item 05 to read, "Authorizations for renewable energy operations and structures will incorporate current best management practices....".	
134	3 - Area-Specific Management Direction	Wilderness Areas	In the 2nd paragraph change the first sentence to read, "The Wilderness Act sets for guidelines for the management of wilderness areas by maintaining five attributes used to describe wilderness character: roadless, untrammelled; naturalness, undeveloped; and outstanding opportunities for solitude or primitive and unconfined recreation."	Being roadless is a key aspect of wilderness areas described in the Wilderness Act and FSH 1909.12 – Land Management Planning Handbook, Chapter 70 – Wilderness
208	Appendix E: Proposed Probable and Possible Future Actions	Water Resources	Add "Objective 3: Accomplish vegetation treatments to protect and improve surface and underground water resources."	
210	Appendix E: Proposed Probable and Possible Future Actions	Roads	Add "Objective 3: Continually identify, close and decommission illegal, user created roads."	
210	Appendix E: Proposed Probable and Possible Future Actions	Roads	Add "Objective 4 Review and update the Lincoln National Forest Traffic Plan every 5 years."	
Lincoln National Forest Draft Environmental Impact Statement - Volume 1				

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Page	Chapter	Section	Comment	Reason
1	1 - Purpose of and Need for Action	Purpose of and Need for Change	Somewhere in the section there needs to be a statement that addresses need for a plan to address illegal user created roads, illegal dumping and other illegal activities.	
9	1 - Purpose of and Need for Action	Revision Topic 3: Multiple Uses and Traditional Interests	Change the 1st sentence in the 1st paragraph to read, "Ranching and forage use factor prominently in the fabric of landscape ecological integrity and rural community social-economic stability."	
10	1 - Purpose of and Need for Action	Tribal Resources	Change the bullet at the top of this page to read, "There is a need for plan components to ensure the sustainability and availability of such forest products as timber, firewood, medicinal and ceremonial plants, edible plants, grazing, recreation and other special forest products for economic and cultural uses."	
15	1 - Purpose of and Need for Action	Theme 3: Livestock Grazing and Rangeland Management	Add the following to the list of comments, "Livestock grazing has an significant impact o rural community's social-economic stability and is a traditional source of family and small business income."	
31	2 - Alternatives	Natural Resource Management (Under Alternative B, Proposed Forest Plan)	In the list of objectives change the 2nd bullet to read, "Restore ore enhance at least 75,000 acres of terrestrial wildlife habitat during each 10-year period following plan approval"	
31	2 - Alternatives	Natural Resource Management (Under Alternative B, Proposed Forest Plan)	In the list of objectives change the 4th bullet to read, "Complete at least eight projects to improve..."	
31	2 - Alternatives	Natural Resource Management (Under Alternative B, Proposed Forest Plan)	In the list of objectives change the 5th bullet to read, "Restore or protect 10 miles of aquatic habitat over a 10-year period"	
31	2 - Alternatives	Natural Resource Management (Under Alternative B, Proposed Forest Plan)	In the list of objectives change the 6th bullet to read, "Improve the watershed condition framework (WCF) score for at least six watersheds over the life of the plan"	
31	2 - Alternatives	Natural Resource Management (Under Alternative B, Proposed Forest Plan)	In the list of objectives change the 7th bullet to read, "Restore or enhance at least 40 acres of wetland over 10 years"	
32	2 - Alternatives	Livestock Grazing and Rangeland Management	Add the following to this section, "Provide 10new water sources in grazing allotments for livestock and wildlife use over 10 years, which could increase the capacity for grazing cattle and wildlife on underutilized allotments."	
32	2 - Alternatives	Livestock Grazing and Rangeland Management	Change the 2nd paragraph to read, "The Forest Service recommends 21,900 acres for wilderness designation, including the Guadalupe Escarpment WSA (figure 2-16, table 2-5)	
32	2 - Alternatives	Wilderness and Special Management Areas	Figure 2-16 is misleading and does not map the so-called wilderness areas defined in Vol 2, Appendix B. Figure 2-16 needs to be replaced in its entirety to reflect where all proposed 22 areas are located in the three districts.	
32	2 - Alternatives	Wilderness and Special Management Areas	The number of recommended Wilderness areas should be reduce to 4 areas, 242 acres, these areas are SBD13, SBD18, SBD22 and SBD24.	While the remaining areas are not large enough to warrant being a wilderness area; being adjacent to an existing wilderness and the fact they meet the definition of an wilderness enables their inclusion into the Alternative B Wilderness recommendations.

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