

Comments for the Lincoln National Forest Draft Land Management Plan

Because our ranch is an integral part of the Lincoln National Forest in the Sacramento Ranger District, the Forest Plan is very important to the operation of our ranch which includes our grazing allotment and private lands and to the operation of our neighbor's grazing allotments as we all work together for equitable multiple usage. As stated on page 319 of the DEIS, "Ranching operations permitted on the Lincoln NF are an important factor in sustaining the local ranching economy and lifestyle." This is true for us as we continue our family's heritage, and support our neighbors who also have this heritage; therefore, we have a vested interest in the outcome of this forest plan.

As stated on page 242 in the DEIS, "The goal of management activities on public land is to improve the conditions of the landscape to provide for a healthy, resilient ecosystem. Overall, the activities should improve ecological conditions of the native wildlife in these lands." This should include the native vegetation as well as wildlife. Unfortunately, many previous forest service actions such as suppressed wildfires have affected the current forest condition which needs to be brought back to desired conditions. All forest users want a healthy, vigorous forest.

On page 11 under At-Risk Species first bullet, "There is a need for plan components that support ecological conditions that contribute to the recovery and conservation of federally listed species (threatened and endangered), maintaining stable to increasing populations of the species of conservation concern, and maintaining common and abundant species." The baseline (as mentioned in the second bullet) and progress toward achieving desired results should be incorporated in the plan to show if the actions taken actually are achieving the desired results using further scientific research. Additionally, on page 315 of the DEIS, we find that "Protecting these species would help maintain or restore ecological conditions, but it could limit the intensity of grazing on allotments where at-risk species are found." This seems to be the driving force behind many of the "environmental" groups that do not have a thorough understanding of the fully functioning forest. The at-risk species are at risk for reasons usually not fully understood, but grazing is mainly the only thing that the forest can control. The large number of motorized recreation and the large numbers of glamping are destroying many habitat but are uncontrolled. Livestock grazers seem to be a victim of discrimination.

Also on page 11 the second bullet under Social and Economic Conditions, and Multiple Uses, it must be remembered that New Mexico water rights belong to those who put the water to beneficial use. These rights can be declared or undeclared, but the first user for the water has the priority and preference usage. (These are some of the valid and existing rights mentioned in the plan elsewhere.)

On page 45, the Gambel Oak Shrubland is mentioned and says "Gambel Oak responds to fire with vigorous sprouting from the root crown." This type of growth is very thick, and no types of treatment are mentioned in the plan although it says that low-intensity fire occurs regularly in intervals of less than 25 years. This thick growth on our ranch replaced the trees killed in the

Circle Cross Fire in 1953. There has not been an additional fire since then, and it is very thick. The same argument pertains to the thick stands of locust that came in after the Scott Able Fire. The plan should include some types of treatment for these areas.

On page 62, the last sentence says “For species of conservation concern, habitat management and compatible multiple uses will be accomplished in such a way that ensures those species’ persistence on the Lincoln, per the 2012 Planning Rule.” How can any plan or action **ensure** a species persistence? This may be a goal but may not be achievable based on acts of nature. The forest service needs to be realistic.

02 on page 65 under Terrestrial Species and Habitats Objectives specifies water developments for wildlife. All water developments should be dual purpose to provide for all animals that use the forest to avoid animal cruelty. If the forest’s goal is multiple uses, and the rancher’s livestock is there, they should have access as well. On page 100 under objective 01, it should be more clear that water features should be dual purpose. The use of the word “or” related to “wildlife or livestock” should not give confusion. On page 208 regarding Objectives for Terrestrial Species and Habitats for achieving desired resource conditions and objectives, the emphasis is to improve the habitat for wildlife. Livestock also use the forest and must be considered when making these improvements. For example, water developments need to be dual purpose not just for wildlife. On page under Range Objective 1, it reads “improve water availability for wildlife or livestock.” It should read wildlife and livestock even though it includes dual purpose later in the sentence.

The top of page 75 does not list elk as a nonnative invasive species. It may be because of the economic drivers related to the elk, but it is a much larger animal than the Miriams elk that was native. The Rocky Mountain elk that we currently have was introduced in the late 1960’s. The large numbers of the elk also have a dramatic impact on the forest vegetation and riparian areas that we have seen first-hand.

On pages 86 and 209 under Collaboration, Partnerships, Education, and Relationships Objectives, a fifth Objective should be added to “educate the public, particularly youth, about the benefits of producing forest products and the benefits to the forest of livestock grazing and hunting and how these promote conservation of the forest.” This area is lacking in so many education programs, and it leaves a big gap in public understanding of the values of these activities instead of only hearing the negative side which is so prevalent these days. Balanced education is important to help give a real understanding of all the forest activities and their contributions to forest health.

Additionally, education needs to be provided that teach the public responsible recreation on the forest. Every season we see numerous recreationists’ abuses (litter, user-created trails, congestion at camping areas trampling the meadows, ATV and motorcycle erosive actions, etc.). These actions are irresponsible by the public. The plan must emphasize educating the public to these abuses.

07 on page 102 and #7 on page 218 under Range, it says “Facilitate dialogue between the New Mexico Department of Game and Fish (NMDGF) and livestock producers about ungulates (elk,

deer, and livestock) and the cumulative impacts on forest resources.” This dialogue should be a three-way dialogue between NMDGF, livestock producers, and the forest service. In the past, two-way dialogues have been unproductive. Since the forest service is responsible for the forest ecology, the two agencies must have a strong working relationship.

06 on page 107 should include rules and regulations on recreational activities including ATV and motorcycle usage. To go along with that, on page 109 03, the use of the word “Discourage” is not strong enough! Motorized off trail usage should be prohibited, and consequences should be specified. The use of non-motorized user-created routes by ATVs and motorcycles is causing extensive erosion in many areas of our ranch so that historically used routes are unusable or problematic now. This erosion was not caused by livestock. On page 319 in the DEIS, we find that “The Sacramento Ranger District also provides for motorized use on 169 miles of designated motorized trails. As a result, the Sacramento Ranger District is a popular destination for off-road vehicle recreation.” Too bad that this privilege is often abused by going off the designated trails on closed roads and through any open area in the forest as we have seen, and this activity is the most destructive.

According to page 136 04, a wilderness is to have an unmodified and natural landscape. The Lincoln National Forest has been settled since the late 1800’s, and this has contributed to modified lands that have provided a living for the early settlers through today. Current visitors would not really gain any experiences that are not already available to them if it was designated as a wilderness. Also as stated in this document, most of the forest has grazing allotments on it, and any infrastructure that is maintained causes some disturbance. On the next page under Approaches 04, the expectation is to use non-motorized and non-mechanized practices and minimize structural development. It is unrealistic to have these expectations by imposing a wilderness designation on the useful forest lands and by giving them priority treatment. Management treatments to improve ecosystem composition, structure, and diversity; which would improve the overall apparent naturalness of the area would not be available, which would not contribute to forest health. Forest fires would become more problematic as we have seen in the Gila and Smoky Bear Wilderness area. Furthermore, under no circumstances should a rancher’s infrastructure be removed to make it look more natural. Additional wilderness designations would also contribute to an incremental land grab; therefore, no new wilderness designations should be recommended. Most of the desired features sought in a wilderness are already available in the forest as it already exists.

The desired conditions for wilderness study areas on pages 146 and 147 are similar to what we should find in most places in the forest. The main difference is that there is a restriction on motorized usage. This is logical for the public at large, but it is unrealistic and too restrictive for livestock management to be that controlled when wanting them to depart from long-standing practices that benefit the land to attain an artificial standard. Even some of the standards listed on page 147 have exceptions because the standard is unrealistic to achieve beneficial forest health. On page 148 09 the guideline does seem to allow motorized usage, but infrastructure construction, maintenance, and repair should also be included. On page 97 in the DEIS, it makes me wonder what might change, if anything, to change the wilderness study area to a wilderness. They would

have similar restrictions, but additional restrictions with a wilderness designation would impose unrealistic impositions. Also, on page 229 in the DEIS, there is a concern for at-risk plant and wildlife species that “ecosystem resilience may decline in designated wilderness areas over time due to the lack of habitat restoration and enhancement management.” Therefore, additional wilderness designations are not desirable in many cases.

Decommissioning roads in inventoried roadless areas seems like aggressive action because the roads may need to be used for emergencies with the public, livestock handling, etc. Also, decommissioning roads means very little to many ATV and motorcycle riders which we have observed on our allotment.

Other decommissioning such as in Alternate B on page 31 in the DEIS say that resource damage would be limited by including a guideline for roads constructed for projects to be closed to public access and rehabilitated once the project is complete, unless required for operation or maintenance. This is desirable, however, in practicality small vehicles such as motorcycles and ATVs often do not abide with guidelines and go wherever they choose. That is one of the ways excessive erosion is occurring in the forest. Objective 2 under Roads on page 210 calls for decommissioning roads. This sounds reasonable IF it is agreed to by those using the road. In our experience, this collaboration has not always been the case.

Under the Eligible Wild and Scenic Rivers on page 148, it mentions that the recommended streams do not have to be studied again if circumstances have not changed. It should be noted that not all of the streams always have water, and I believe that is a changed circumstance from when the streams was initially surveyed. Monument Canyon on our allotment fits this category, and it should be surveyed again. The quality of “free-flowing” is not addressed as to how much of the year and if it skips a year or two at a time. It also has a weir dam diverting a large portion of the water to another canyon for part of the year. Additionally, on the next page under Standards, it states “Rivers found unsuitable through a suitability study, for inclusion in the National wild and Scenic River System shall be released from further consideration and the direction in this section.” Due to its intermittent water, if water is present at all, would show that it is unsuitable for this inclusion. Additionally, in Appendix G the purpose for the Wild and Scenic Rivers Act is unclear other than to identify areas that benefit recreation. It seems contradictory to promote for recreation and then at the same time protect it.

The term “Leave No Trace” has been used in the forest plan. This should be included on page 218 Management Approach 2 for camping and motorized vehicle usage. At the least include signage in an effort of educational objective.

The Memorandums of Understanding that are listed on pages 250 and 251 seem to have omitted coordinating with the commissioners in Otero County, Lincoln County, Eddy County, and Chavez County. These should be implemented if not already done.

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The 5 alternatives are compared on pages S-1 and S-2. Although these alternatives have many similarities, there should be leeway in essentially mixing and matching desirable qualities from each of the alternatives without having to settle on one totally. For example Alternative B has a number of good qualities, but other elements of the other alternatives would be more suitable to achieve the desired results for all of the stakeholders.

Quite a few towns under location on page 1 are listed, but Timberon is omitted. It is a newer village but quite viable in relation to the forest with full-time and part-time residents as are other villages such as Sacramento.

Alternative A has worked fairly well for many years although more clarification in some areas would be helpful to meet desired conditions. Forage and vegetation are emphasized to bring the forest to a level where it provides for the local economy, forest health, and without infringing on current rights of forest users, but it will take longer.

Alternative B introduces some changes that can provide for greater forest health by using methods to move toward desired conditions more effectively while maintaining forage and vegetation for the local economy. Under Economics on page 32, it says "Grazing would continue at current levels, but plan direction would provide additional protection for sensitive natural resources, including riparian areas." The plan should emphasize measures to offer similar water resources to the rancher while maintaining the rancher's valid, existing rights. It is often assumed that grazing is detrimental to riparian areas, and the forest service plans protection in the form of fencing out cattle but not other species. If riparian areas are observed on private lands with grazing, it is often seen that grazing has not adversely affected those riparian areas. There are several on our ranch, and they are currently functioning well although they may have been subjected to flooding after forest fires in the past.

The additional wilderness designations are unnecessary and should not be considered because the areas to be included will excessively restrict the use of those areas and infringe on the ability to manage the areas as effectively as they need to be by the forest as well as by the rancher. For example, no motorized access is unreasonable in caring for the land (limited might be reasonable but not any is unreasonable), vegetation overgrowth making the land unproductive and prone to wildfires would likely occur; solitude and communing with nature is already available in these areas. Some people just like the idea or the sound of wilderness, but it is impractical for the above reasons in this age and in this forest.

In the DEIS on page 38, the Elements Specific to Alternative C are poor considering the fact that desired conditions on the forest could not be met by reducing the available acres for mechanical treatment, and the number of acres for recommended wilderness amounts to only a land grab without actually providing anything that cannot already be achieved in the forest currently. In fact the large designation would be detrimental to the forest because of lack of ability to properly care

for the areas. The forest is a natural resource that is meant to be used and cared for. This alternative is not compatible with that and would restrict multiple-usage.

Alternative D has very little difference from other alternatives as many projects for forest and wildlife health are already being done.

Alternative E is a more logical alternative for using the natural resources of the forest for more users' opportunities. It especially recommends less wilderness designation than all alternatives besides A. This is a more logical approach although NO additional wilderness designations would have more benefits for forest management and access to the land. It also promotes recreational uses at developed recreation sites (page 274). This would help to preserve the forest on a larger scale rather than with disbursed camping, but the motorcycles and ATVs would still take a toll on the ecosystem and landscape.

On page 52 there seems to be a desire on the part of the forest to acquire private lands. It gives the impression that private land owners are unable or may be unwilling to meet the forest needs by their ownership. Forced or dictated or condemnation proceedings to achieve this is unacceptable and should never be considered. Private property rights are essential for a good functioning society.

On page 75 livestock grazing is always considered when dealing with a listed species. There are many other aspects that need to be considered regarding viability of a listed species, and these should also be taken into consideration. Other aspects can be moisture availability including rain for plants, flooding, drought, seasonal lack of water, temperature fluctuations, composition of soils, tree cover or lack, wildlife influences, invasive plants and animals, etc. Responsible livestock grazing generally has minimal effect on many compatible species. It must also be remembered that grazing and overgrazing are not the same. Under the allotment permit system grazing numbers are kept compatible with forage conditions throughout the season which is part-year for our ranch.

On page 142 impacts on vegetation from livestock grazing are listed in a negative way at the top of the page. Some benefits of livestock grazing are given later, but these should always be balanced. For example, the potential for nonnative, invasive plant and seed dispersal is given, but livestock also disperse beneficial plants and seeds. The forest service has also dispersed nonnative invasive love grass in the forest and very heavily on our ranch which is spreading. The inability to control it is more problematic than any livestock transmission, and spraying it on private land has been ineffective. Furthermore, the ability to spray the invasive musk thistle has resulted in dense populations in some areas.

On pages 142 and 166 under the positive effects of livestock grazing, it says that grazing can help protect rangeland from impacts by nonnative species, such as feral horses and pigs, and native species, such as elk.

Also mentioned on page 142 is the Rocky Mountain Elk that are present in the Lincoln NF currently are an introduced nonnative species. This error needs to be corrected. Then on page 222 in the list of introduced game species elk is not mentioned. On page 310 deer and elk are mentioned as native ungulates.

On page 147 it states “All action alternatives include objectives that would restore and enhance terrestrial wildlife habitat etc.” The habitat should be restored and enhanced for both wildlife and livestock as they both use the habitat.

It is interesting on page 216 the information related to the New Mexico Meadow Jumping Mouse says that the mouse is found along perennial streams, and the stream on our allotment is an intermittent stream with willows that were planted by forest service personnel at different times and by the CCCs in the 1930s. This has created a nonnative environment with little survival rate of the willows. The data used for listed species does not always support the history. Additionally, on page 224 under At-Risk Wildlife Species, roads are mentioned and the effects that they can have on at-risk species. The stream that is supposed to support the New Mexico Meadow Jumping Mouse on our allotment has a county road running right alongside it for the full length. That road has had increased usage each year, and the potential negative effects as listed on this page do not seem to be a consideration in “protecting” the designated habitat along this road and intermittent stream. This road is a major artery for the forest and must not be decommissioned. Then on page 226 under At-Risk Wildlife Species, it says “Wildlife species could be disturbed by noise associated with treatments, which could lead to such impacts as stress, displacement, or habitat avoidance.” During construction of the pipe fence to “protect the habitat” in the area where the mouse is supposed to be found on our allotment; the stream had dried up that year, and construction vehicles drove all over the area. A detrimental effect may have been caused by those actions. Unintended consequences sometimes happen through actions without “complete” analysis. Additionally the fence along the stream bed did not emphasize a natural-appearing scenery as desired in the forest on page 269.

As is seen on page 267 “Past management has resulted in an abundance of smaller and younger trees across the landscape, a buildup of fuels, and the occurrence of more continuous fuels than were historically present.” Therefore, it is important to have fuels treatment to bring the forest to a more healthy condition and to prevent catastrophic fires that we see happening in other areas. This in itself should discourage any additional wilderness designation.

On pages 312 and 315 it mentions that “Treated allotments would likely be rested during restoration, thus removing the availability of authorized AUMs” a “Prescribed wildfire is likely to lead to removal of livestock for a longer period.” In a situation like this, the forest service should provide alternate pasture until the treated area can be utilized. This could be in vacant allotments. Also on this page, riparian restoration is mentioned. This can be difficult in times of drought.

In conclusion, although the Draft Forest Plan has selected Alternative B some sections should be considered from another alternative. The alternative for wilderness selection would be better

addressed in alternate A or a second best alternate E so that fewer acres would be encumbered without adequate viability to manage the area.

Our ranch works diligently to care for our forest allotment and our nearby private lands, and our experiences should augment the scientific data that is used to construct the plan.