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Nov. 5, 2021

Mr. Travis Moseley
Forest Supervisor, Lincoln National Forest

Ms. Diane Prather
Forest Planner, Lincoln National Forest

Dear Mr. Moseley and Ms. Prather,

Please accept the following comments on the Draft Lincoln National Forest Plan from the New Mexico Wildlife Federation.

Founded in 1914 by pioneering conservationist Aldo Leopold, the NMWF is the oldest conservation group in New Mexico representing the interests of wildlife as well as hunters and anglers. Through our email newsletter and other venues, we provide information about conservation issues to more than 80,000 people per month.

Overall, the NMWF is concerned that the Draft Forest Plan and supporting documents downplay the severity of climate change and fail to spell out adequately how the Lincoln National Forest will monitor and respond to it in the years to come. That bedrock failure undermines every aspect of the plan, rendering conclusions about the future effects of livestock grazing and other activities on riparian zones and wildlife likely invalid.

While the Draft Forest Plan forest plan dismisses drought and climate change as “random weather events,” The reality, of course, is much more alarming.

As President Biden remarked this spring at the Virtual Leaders Summit on Climate, our nation -- and indeed our entire planet -- has only limited time to address greenhouse gas emissions. “This is the decade we must make decisions that will avoid the worst consequences of a climate crisis,” Biden said, adding that we must keep the increase in the Earth’s temperature to 1.5 degrees Celsius.

President Biden and New Mexico Gov. Michelle Lujan Grisham both have called on our nation and our state to preserve 30 percent of our lands and waters by 2030 to address climate change (30x30).

The NMWF believes it’s imperative that the Lincoln National Forest come to grips with climate change reality and reflect that understanding in the final Final Forest Plan. The final

plan must be responsive to executive directives to achieve 30x30 as it spells out agency vision for the management of over 1 million acres of public land in Southern New Mexico.

The President has put the U.S. Forest Service and every other federal agency is on notice: you must act to address climate change. Kicking the can down the road for yet another planning cycle is not an option.

Yet it's no exaggeration to say the planning documents downplay the grim reality of climate change. For example, in Volume 2 of notes on the Draft Environmental Assessment, it states, "Random weather events, such as drought, floods, avalanches, high wind, and climate change, are included as threats to at-risk species but are not treated as a threat category. Most management actions conducted by the Forest Service on the Lincoln NF are intended to increase landscape resiliency to random weather events by moving ecosystems toward their desired conditions."

Rather than falsely dismissing climate change as a random event, the NMWF believes the Final Plan must specify that forest managers will monitor changing climate conditions and remain flexible in their responses. The future may well require sharp reductions in livestock grazing, road closures and other bold steps to protect wildlife, riparian areas and natural resources. The Final Plan should anticipate and plan for this harsh reality, not downplay it.

Wildlife

The NMWF is aware of the detailed comments on the draft plan that are being submitted by Audubon Southwest and joins in those comments.

In particular, Audubon notes that over 70 different species of birds that occur in LNF, either year-round or during the wintering, breeding or migration seasons are either moderately or highly vulnerable to extinction under a 3.0° C warming scenario. And while all of these species may not rely on LNF for a significant portion of their habitat, many of them do and in some cases those populations are substantial. Audubon notes that it's inexcusable that the list of at-risk avian species includes only 5 birds, 4 of which do not have established populations in Lincoln National Forest.

Livestock Grazing

Set against the Draft Plan's failure to address climate change in a meaningful fashion, it repeatedly emphasizes the cultural and economic importance of continued livestock grazing. Yet it generally fails to identify any real approach to reduce the harm the plan itself documents that livestock are now causing to threatened species and increasingly scarce water resources.

The planning documents specify that livestock grazing on the forest is harming riparian zones, water quality and a range of threatened species, including fish, plants and

wildlife. Yet all of the planning alternatives would continue the same level of livestock grazing as under the 1986 Forest Plan.

The Draft Plan states, “Under all alternatives, the management of designated wilderness may affect the permittees’ ability to graze livestock; however, there would be no additional impacts on grazing operations, as no new wilderness would be designated. Grazing would be available on existing active allotments, regardless of wilderness designation, under any alternative.”

The Draft Plan acknowledges that, “Given the arid nature of the Southwest, aquatic habitats and their associated riparian vegetation are both rare and highly vulnerable, yet many species depend on them in order to persist. Upland and riparian soils and vegetation can be negatively affected through grazing and browsing pressure by both livestock and native ungulates. Soils can be compacted and eroded under heavy grazing pressure, and plant species composition may shift toward undesirable species as a result of forage preference. Riparian and aquatic habitats may experience concentrated use resulting in streambank, seep, and springside degradation, soil loss, and vegetation loss. These in turn can affect aquatic organisms through sedimentation and higher stream temperatures, thereby decreasing viability and reproduction.”

In the species-by-species analysis, the planning documents list grazing as having a harmful effect on many species of threatened animals and plants, including the Mexican Spotted Owl, New Mexico jumping mouse and many species of butterflies.

The segment on the Rio Grande cutthroat trout -- the New Mexico state fish -- for example, states, “Threats to the species are nonnative invasive fish introductions, habitat degradation, reduced streamside cover due to grazing, timber activities, and uncharacteristic wildfire and drought.”

Yet, while the plan has no apparent provision for evaluating the ongoing effects of climate change, it does call for evaluating vacant grazing allotments every 5 years to determine “availability to livestock grazing at appropriate stocking levels and compatibility with other multiple use values.”

The NMWF finds this unacceptable. We recommend ongoing assessment of all grazing allotments, not merely vacant ones. And these assessments over the life of the plan should look at whether grazing is appropriate at any level, given water resources and degradation of the landscape by cattle, or whether allotments need to be withdrawn before such damage results in the local extirpation of threatened or endangered species.

The plan states that new sheep and goat allotments will not be established where there's potential for disease transmission to bighorn sheep. The NMWF suggests that the plan flatly prohibit any sheep or goat grazing. Experience around the West has shown there's no sure way to insulate wild sheep populations from disease transmission from domestic flocks. Fragile rangeland conditions can't accommodate the destructive grazing practices of sheep and goats in these increasingly dry conditions.

The plan fails to mention Chronic Wasting Disease, which has been identified in the area. It fails to address how forest management could address the spread of the disease. The NMWF recommends the Final Plan address this shortcoming.

The Draft Plan states, "Lincoln National Forest managers cooperate, collaborate, and coordinate with livestock producers and stakeholders to respond to changing resource conditions. Cooperation, collaboration, and coordination with stakeholders is key to improving rangeland and forest conditions for multiple uses, moving towards desired conditions, and contributing to the socioeconomic wellbeing of local communities."

The NMWF believes the Forest should widen the scope of its assessment beyond merely keeping local permittees afloat at the expense of tremendous harm to riparian resources, endangered species and the enjoyment of others who wish

to recreate in forests free from livestock waste and overgrazing.

Recent analyses of New Mexico's outdoor recreation economy have found it contributes billions to the state's economy while creating thousands of jobs. If New Mexico is to continue to draw visitors from around the country and around the world, it's critical that forest planning take into account the financial value of having more untrammelled lands, preserved in their wild state, where wildlife may flourish and visitors can enjoy their stay without worrying about stepping in cow manure.

Riparian Zones/Wild and Scenic River Segments

The Draft Plan fails to specify real protections for river segments eligible for inclusion in the nation's wild and scenic river system pending final action. In instances in which proposed management activities or projects may compromise a river segment's outstandingly remarkable values, the plan says the response should be to prepare a suitability analysis. The NMWF holds that the Final Plan must require forest managers first to seek changes in the proposed projects' design, location and implementation to avoid any harm to eligible river segments.

Riparian zones make up only about 0.3 percent of the Lincoln National Forest, the Draft Plan states. While it specifies that they're important to plants and wildlife, it gives

scant attention to the harm that cattle grazing causes them. Meanwhile, the Draft Plan specifies that the functioning of 91 percent of watersheds on the forest already is at-risk or impaired.

“Riparian areas provide habitat for aquatic and terrestrial wildlife, cover and forage for livestock, as well as providing for cultural, recreational, aesthetic, and spiritual values of humans,” the Draft Plan states. It also notes that demand for water will continue to increase in coming decades, yet seems to fail to attempt to reconcile these exclusive factors.

The Draft Plan states, “Where possible, range infrastructure and livestock management practices that may contribute to concentrations of livestock such as salting, livestock troughs, tanks, corrals, and holding facilities should be located out of riparian management zones (along streams and around seeps, springs, lakes, and wetlands) to protect riparian ecological resources.”

Given the overwhelmingly poor condition of watersheds on the forest, this is insufficient. The NMWF recommends that the Final Plan specify that no activity that results in concentrating livestock along streams or riparian zones be permitted. Forest managers should consider a program of removing such infrastructure over the life of the plan.

The NMWF is aware of the detailed comments on Wild and Scenic River segments and on water management in

general that are being submitted by the Pew Charitable Trust and the NMWF joins in those comments.

Water Quality

The Draft Plan makes it plain that the Lincoln National Forest faces a significant water quality problem. The Draft Plan states, “Approximately 61 percent of the Lincoln National Forest’s streams are listed as impaired by the New Mexico Environment Department.”

“Activities generating nonpoint source pollutants on the Lincoln NF are past and present mining, livestock grazing, road construction, timber and fuelwood harvesting, recreation, and ground disturbance from off-highway vehicles,” the Draft Plan states, adding that natural and unknown sources of pollutants may also contribute to nonpoint source pollution.

The Draft Plan states, “As the Lincoln National Forest works towards moving water resources towards desired conditions, all four categories of ecosystem services (supporting, regulating, provisioning, and cultural) will more fully be realized.” Yet without significant reductions in livestock grazing, and in the face of climate change, how is this true? The Final Plan must address this in detail.

The NMWF is aware of the detailed comments on forest water resources being submitted by the Pew Charitable Trust and joins in those comments.

Off-Road Vehicle Use/Abuse

In public meetings, Forest Service personnel have identified rampant off-road vehicle use as a significant problem on the forest, yet they have said the agency lacks funds and personnel to address it. The NMWF believes the agency should address this apparent shortfall in the plan, and call for more resources to address this critical issue.

The plan should address what resources are necessary to enforce existing laws to prevent this million-plus acres of precious public land from increasingly becoming a dirt-track for ORV abuses. Unregulated ORV use is identified in the Draft Plan as a contributing factor to water pollution. It also obviously disrupts wildlife, causes noise pollution and reduces enjoyment for other forest visitors.

In public meetings, hunters have said that it's increasingly difficult to find a place to hunt on the forest where they and the wildlife they seek aren't disturbed by engine noise or the actual physical presence of ORV riders..

The NMWF recommends that the Forest Plan better address that problem. There are currently nearly 2,700 miles of roads on the forest, of which over 1,100 miles are officially closed. The Forest Service needs adequate resources to make sure no one uses those closed roads and special attention is required to keep vehicles out of streams and riparian areas.

The NMWF objects to the current Forest Service practice of offering special-use authorizations that allow the use of ORVs for hunting-guide access on roads that are closed to the general public. Hunting guides and outfitters should be subject to the same road-closures as the general public. Forest rules and regulations shouldn't bend to accommodate those members of the public wealthy enough to retain outfitters. The Final Plan should restrict outfitters and their clients to only those roads and areas open to the general public.

The Draft Plan states that, in addition to the recognized road network, there are unauthorized roads all over the landscape that survive in varying states of repair from past logging and mining activities. The NMWF suggests the Final Plan spell out a comprehensive program for identifying and obliterating those roads, starting with those that do the most damage to river systems, wildlife breeding and migration areas and other critical natural resources.

The NMWF recommends the Final Plan designate a limited ORV trail network that will allow seasonal recreation to continue for those who desire to ride, while leaving the majority of the forest undisturbed for wildlife and other forest visitors who wish to escape the noise and fumes of motorized vehicles.

The Draft Plan states that “over-the-snow vehicle travel should be allowed where snow depth is adequate -- except in wilderness areas or areas closed to over-snow vehicles -- in order to protect other resources such as administrative sites, reforestation, and sensitive plant and wildlife areas.”

The NMWF recommends that the Final Plan limit snow machines to designated trails. It should specify that the Forest Service will consult with the New Mexico Department of Game and Fish to identify appropriate times and areas for their operation.

Wilderness

Currently there are only two congressionally designated wilderness areas in the forest, totaling just over 83,000 acres. The NMWF supports a quick determination by the U.S. Secretary of Agriculture that the 20,100-acre Guadalupe Escarpment Wilderness Study Area should be added.

At 8 percent total wilderness, the Lincoln National Forest is far below President Biden’s 30x30 target. This reality should prompt serious review and quick federal action on wilderness study areas. The review should also consider whether the forest’s 11 inventoried roadless areas merit additional protections.

The NMWF recommends that the Final Plan prohibit livestock grazing in designated wilderness areas to preserve and protect water quality and wildlife.

NMWF Preference Among Plan Alternatives

The NMWF is aware that at this stage of analysis, the Final Plan will likely select among the various alternatives for resource management options that you have presented in the Draft Plan. The NMWF prefers various elements of various alternatives, and presents those preferences to you as follows:

Road Decommissioning: The NMWF favors the roads approach spelled out in Alternative D. This would prioritize road decommissioning in riparian areas or to improve habitat connectivity.

Roads/Recreational Access: The NMWF supports the approach specified in Alternative E. This calls for access roads to developed recreation sites to be maintained at level III or higher.

Cave Development: The NMWF opposes the approach spelled out in Alternative E. This would call for surveys to identify more caves suitable for recreational access. The NMWF believes that the likely disruption to bats and other attendant wildlife should preclude this approach

Chemical Treatment of Vegetation: The NMWF favors the vegetation approach spelled out in Alternative C. This would specify that no chemicals should be used in vegetative treatments. The risk of ground- and water pollution precludes this approach.

Conifer Thinning: The NMWF favors the thinning approach spelled out in Alternative B. This calls for at least 6,000 to 8,000 acres of mechanical thinning over 10 years. The Lincoln NF has seen dangerously dry fire conditions in recent years. Earlier this year, for example, the Three Rivers Fire burned about 12,000 acres in a 24-hour period. The NMWF believes that forest thinning projects that take into account protection of riparian zones and other sensitive resources are necessary.

Ponderosa Thinning: The NMWF favors the thinning approach spelled out in alternative B. This calls for 2,000 to 3,000 acres of mechanical thinning -- the maximum amount of thinning among all the alternatives. Again, the NMWF believes that carefully managed thinning projects are necessary for forest health and catastrophic fire prevention.

Pinon/Juniper Thinning: The NMWF favors the thinning approach spelled out in Alternative B. This is the maximum amount of thinning among all the alternatives.

Riparian Zones: The NMWF favors the riparian approach spelled out in Alternative B. This would improve a minimum

of 12 miles of riparian areas considered to be functioning at risk or nonfunctioning over a 10-year period. This is the highest amount of restoration among all the alternatives. Riparian zones make up a tiny but critically important portion of forest lands and the NMWF supports maximum possible protection.

Wildlife/Restoration of Habitat: The NMWF favors the wildlife approach spelled out in Alternative D. This calls for restoring or enhancing at least 75,000 acres of terrestrial wildlife habitat during each 10-year period following plan approval. This is the maximum amount of restoration among all the alternatives. Taken together with thinning projects, habitat restoration is critical to sustain wildlife populations and protect resources.

Wildlife/Non-native Fish: The NMWF favors the approach spelled out in Alternative D that would reduce nonnative fish in native fish populations in at least six stream reaches during each 10-year period following plan approval. This is the highest amount of restoration of all the alternatives. Together with maximum possible riparian protections, the NMWF welcomes a management approach that protects and enhances native fish populations.

Wildlife/Riparian Habitat: The NMWF favors the approach spelled out in Alternative D. This calls for improving habitat connectivity for aquatic and riparian species. Work may include removing barriers, relocating and decommissioning

roads, restoring dewatered stream segments, connecting fragmented habitat, and providing wildlife passage friendly fences during the 10 years following plan approval.

Wildlife/Riparian Habitat: The NMWF favors the approach spelled out in Alternative D. This calls for restoring or protecting 10 miles of aquatic habitat over a 10-year period.

Water Resources/Watersheds: The NMWF favors the approach spelled out in Alternative D. This calls for improving the WCF score for at least six watersheds over the life of the plan.

Water Resources/Wetlands: The NMWF favors the approach spelled out in Alternative D. This calls for restoring or enhancing at least 40 acres of wetlands over 10 years.

Lands and Access: The NMWF favors the approach spelled out in Alternative C. This calls for land acquisition evaluations to prioritize lands that provide connectivity for terrestrial and riparian plants and wildlife.

Range Improvements: The NMWF favors the approach spelled out in Alternative E. This calls for providing 10 new water sources in underutilized allotments for wildlife and livestock use within 10 years. The NMWF supports this alternative out of concern for wildlife, and again suggests that the Forest Service assess and control livestock grazing in light of climate change and range conditions.

Renewable Energy: The NMWF favors the approach spelled out in Alternative E. This calls for conducting an assessment of areas appropriate for energy development within 10 years of plan approval.

Thank you for your consideration of the NMWF comments on the Draft Plan. Please keep us informed of agency actions as the planning process moves forward. Please don't hesitate to contact me with any questions or concerns.

Sincerely,

Jesse Deubel
NMWF Executive Director