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**San Francisco Soil and Water Conservation District**

P.O. Box 119 – Glenwood, New Mexico 88039

575-539-2593

 September 28, 2024

Submitted via https://cara.fs2c. usda.gov/Public//CommentInput? Project=51887

USDA-Forest Service Southwest Region

ATTN: Objection Reviewing Officer

333 Broadway Blvd. SE

Albuquerque, NM 87102.

RE: Objections for the Gila National Forest Land Management Plan - Responsible Official: Camille Howes, Forest Supervisor, 3005 E. Camino del Bosque, Silver City, NM 88061

The San Francisco Soil & Water Conservation District (District) participated in all of the technical meetings concerning the plan revisions.

**Objection Statement 1**

We consistently questioned the baseline for determining the desired future condition as presented in the Forest Plan Assessment. The baseline concern is having the forest lands returned to pre-European settlement conditions. Our objection is this direction is not achievable and will have detrimental unintended consequences.

We stated in our Assessment and Need for Change Comments that, Friederici 2004 points out “natural range of variability” (NRV) alternately referred to as the “historic range of variability” (HRV) may not ever be achievable. (Attachment A).

**Improvement Suggestion**

We requested in our assessment and need for change comments that the Gila National Forest reduce tree densities through thinning and timber harvesting. A proper baseline assessment would be conditions that existed between 1970 and 1978. This would be a proper assessment of “present and anticipated uses” that conforms to Congressional intent in the National Forest Management Act of 1976.[[1]](#footnote-1) &[[2]](#footnote-2) instead of the NRV unlawful departure in 36 CFR 219.

**Objection Statement 2**

The District’s requested consideration of a number of needs for change did not get incorporated in the final plan and therefore did not receive any environmental impact analysis (EIS). Those need for changes are:

1. Develop desired conditions to create a varied mosaic across the landscape to create ecological resilience.
2. Update plan to incorporate Catron County and other community Wildfire Protection Plans and incorporate direction from the Healthy Forest Restoration Act.
3. There is a need for a desired condition for water impoundments for storage and use for agriculture and erosion control.
4. Flood protection is a missing need for change.
5. Air quality has been suffering from the effects of prescribed and wildland fires. A need for change exists to describe how the Gila NF will consider fire management impacts on air quality particularly effects on human health.
6. A missing need for change is recognizing the benefit of more public dispersed use. This is desirable to reduce concentrated use impacts. If the HRV of pre-European condition is to be used then we have to recognize that Indians exercised dispersed use to the extreme and carried out active management and use of the forests and rangelands.
7. Need for change to provide infrastructure improvements for resource protection and resource harvesting.
8. No net loss of private lands is a policy of a number of state and local governments and is missing from the needs for change.

**Improvement Suggestion**

The plan’s description of desired conditions, standards and guidelines are vague and ladened with potentially subjective direction that will not allow for a determination of plan efficacy. Without a means to determine if plan objectives are being achieved it is rendered useless. Adaptive management cannot be accomplished if one does not know if one is effectively reaching specific goals.

The GNF should conduct a proper assessment and need for change in order to created objective directions. Without this a meaningful plan cannot be created and the EIS is rendered meaningless.

**Objection Statement 3**

As stated in our comments on the Draft Revised Gila National Forest Plan (Attachment B) we had serious concerns with using Ecological Response Units (ERUs) as a planning basis. We stated, “With a predetermined desired natural ecosystem concept (presented as ERUs) being introduced and implemented in the draft GNF plan, it would be reasonable to also present the expected future ecosystem characteristics (ERUs) under continued multiple use, sustained yield management.”

**Improvement Suggestion**

Proper functioning condition (PFC) is a result of having a mosaic of uneven age patches across the landscape. PFC requires hands-on management. The final plan relies on GIS computer driven polygon management. The District suggests returning to having trained personnel in silviculture and range management that serve long durations at the ranger district level. This will allow managers to become knowledgeable of the resource needs and serve long enough to determine if their management actions achieved their objectives.

**Departure From Statute and Regulations**

We find no mention of ERU, NRV or HRV in the National Forest Management Act of 1976. On the contrary we find that the primary intent is management “to improve and protect the forest within the boundaries, or for the purpose of securing favorable conditions of water flows, and to furnish a continuous supply of timber for the use and necessities of citizens of the United States.”[[3]](#footnote-3)

**Objection Statement 4**

The final Gila National Forest Plan states, “The Gila National Forest is also dedicated to expanding the respectful application of Indigenous Knowledges in coordination with the Interagency Indigenous Knowledge Working Group. Indigenous Knowledges are proprietary information and require special safeguards and permissions to ensure that they are considered and applied in a manner that is prescribed by Tribes, Pueblos and indigenous communities in accordance with the Cultural and Heritage Cooperation Authority.”

The Draft Revised Forest Plan and all of the previous drafts the District reviewed and commented on had “Tribal Importance and Use and Tribal Relations sections. The terms “Indigenous Knowledge(s)” and “co-stewardship” did not exist in any of the drafts.

The Final Forest Plan states, “With the heightened emphasis on co-stewardship, there will be more collaboration and integration of Indigenous Knowledges into the management of the Tribe’s and Pueblo’s ancestral lands and waters. Co-stewardship offers a path forward. One in which the Indigenous Knowledges and practices that have allowed Native peoples to survive climatic change over millennia can inform future management decisions that will influence the trajectory of our natural and cultural environment. Co-stewardship that values and integrates all voices and knowledges is key to climate change adaptation.”

The District objects to insertion of management directions we had no opportunity to comment on. Further, co-stewardship and the use of Indigenous Knowledges has no scientific basis.

**Departure From Statute and Regulations**

There is no provision in the National Forest Management Act of 1976. 36 CFR 219 in effect at the time the drafts of the Gila National Forest Plan did not contain any reference to Indigenous Knowledge(s) or co-stewardship. In fact, those provisions were not added until 2024[[4]](#footnote-4) four years after completion of the Draft Revised Gila National Forest Plan.

The Forest Service has acknowledged that Indigenous Knowledge could be withheld from the general public thereby preventing examination and scientifically verifying that information. This is a violation of the Data Quality Act and the OMB implementation guidelines.

**Conclusion**

The District participated as a Cooperating Agency and commented on the Assessment and Needs for Change and the several drafts of the forest plan. We also participated in all the technical committee meetings. We believe that if the Final Plan is adopted the Gila National Forest will continue to decline ecologically and the communities and peoples living in and using the forest resources will continue suffer socially, culturally, economically.

Sincerely,



Howard Hutchinson, Chair

Attachment A

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**San Francisco Soil and Water Conservation District**

P.O. Box 119 – Glenwood, New Mexico 88039

575-539-2473

 July 25, 2017

Mr. Adam Mendonca, Forest Supervisor

Gila National Forest

United States Forest Service

3005 East Camino del Bosque

Silver City, NM 88061

**RE: Comments on Assessment and Need for Change Statements for Management Direction Under the Existing 1986 Forest Plan**

Dear Supervisor Mendonca,

**Final Assessment**

After a review of the final assessment, we are pleased to see the recognition of stakeholder input with respect to the assessment of ecological integrity and sustainability. There is the disclosure in that input “that this approach creates a false separation between humans, the environment and ecological processes, and fosters the impression of a negative relationship between humans and ecological integrity.” However, “natural range of variability” (NRV) alternately referred to as the “historic range of variability” (HRV) that Friederici 2004 points out may not ever be achievable.

The NRV is part of the definition of ecological integrity. The 2012 Planning Rules (Planning Rule) define NRV as those conditions that pre-date European settlement. This is the fatal flaw of the assessment and needs for change. The Planning Rule predetermines the outcome of forest planning and revision. This flaw extends to all of the terms used in the planning process being defined in the Planning Rule. This removes any possibility of meaningful affected interests’ input into the plan. This was the comment provided and ignored during the planning rule development.

**Conclusion**

State, Tribal, local government and the public are effectively removed from the decisions affecting the Gila National Forest plan revision. Even the Gila National Forest Supervisor will not have discretion to deviate from the Directives and Planning Rule. The entire process then becomes a rubber stamping of the Planning Rule and checking off boxes prescribed by the Directives. This is far removed from actual public participation the Forest Service pretends exists.

**Needs for Change**

Most of what is contained in the needs for change is based on the flawed concept of returning the forest to pre-European conditions. This will result in resources being directed at management actions with no meaningful benefit.

With that in mind we were requested to examine the needs for change for missing needs for change. Here are our suggested changes and inclusions:

Page: 9

Develop desired conditions to create a varied mosaic across the landscape to create ecological resilience.

Page: 10

Update plan to incorporate Catron County and other community Wildfire Protection Plans and incorporate direction from the Healthy Forest Restoration Act.

Page: 11

The paragraph starts with “Soils are a non-renewable resource.” Soils are renewable. While southwestern soil building is a slow process that is what defines portions of the ERUs. There is limited soil survey data for the Gila National Forest. Therefore, the assessment driving this need for change is flawed.

Page: 13

There is a need for a desired condition for water impoundments for storage and use for agriculture and erosion control.

Flood protection is a missing need for change.

Page: 14

Air quality has been suffering from the effects of prescribed and wildland fires. A need for change exists to describe how the Gila NF will consider fire management impacts on air quality particularly effects on human health.

Page: 19

A missing need for change is recognizing the benefit of more public dispersed use. This is desirable to reduce concentrated use impacts. If the HRV of pre-European condition is to be used then we have to recognize that Indians exercised dispersed use to the extreme and carried out active management and use of the forests and rangelands.

Page: 21

Need for change to provide infrastructure improvements for resource protection and resource harvesting.

Page: 23

No net loss of private lands is a policy of a number of state and local governments and is missing from the needs for change.

The San Francisco Soil and Water Conservation District appreciates this opportunity to comment on the assessment and needs for change. We look forward to providing additional input as the process advances.

Sincerely,



Howard Hutchinson, Chair

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**San Francisco Soil and Water Conservation District**

P.O. Box 119 – Glenwood, New Mexico 88039

575-539-2593

April 10, 2020

Submitted via: https://cara.ecosystem-management.org/Public//CommentInput?Project=51887

Mr. Adam Mendonca, Forest Supervisor

Gila National Forest

United States Forest Service

3005 East Camino del Bosque

Silver City, NM 88061

**RE: Comments for the Draft Revised Gila National Forest Plan.**

Dear Supervisor Mendonca,

Thank you for this opportunity to comment on the Forest Plan Revisions. The San Francisco Soil & Water Conservation District (District) participated in all of the Technical meetings concerning the plan revisions. We consistently questioned the baseline for determining the desired future condition in those meetings and as presented in the Forest Plan Assessment. The baseline concern is having the forest lands returned to pre-European settlement conditions. We have concerns that this direction is not achievable and will have detrimental unintended consequences.

**COMMENTS ON THE GILA FOREST PLAN REVISIONS**

1. *In the description of “Traditional Uses” as found on pages 4 and 5 of the Draft Plan, the very important downstream use of water coming from the lands that make up the GNF is not recognized.*

**Concern:** The District views this as a major issue The downstream supply of water coming from the mountainous terrain that now makes up the Gila National Forest (GNF) played a critical role in the early settlement of Southwest New Mexico and Southern Arizona. The waters that historically flowed in the San Francisco and Gila Rivers greatly influenced the settlement of the area that makes up Southwest New Mexico and Southern Arizona, and today Gila River water supports many of the people that currently inhabit the arid Southwest.

**Requested Action:** It is suggested that the historical importance of the Rivers originating in the GNF and the supply of water they provided for hundreds of miles downstream be recognized.

1. *Although other restoration methods support the traditional uses of the national forest and are an important part of the vision for the future, fire has been and will remain the primary restoration tool. (Second to last sentence, first paragraph, page 7)*

**Concerns:** Fire has only recently become the primary restoration tool on the GNF. Using fire as a restoration tool only came to be the primary treatment for restoration when the watershed and timber management programs on the GNF were devastated by litigation. In the past, outside funding sources and the use of timber sale receipts funded a large portion of the GNF fuels management, timber stand management and other vegetation/watershed restoration projects.

Previously the primary use of fires on the GNF has been to treat the slash generated by fuel wood harvesting, timber harvesting and thinning practices. It has not been that long that the use of fire has been considered to be a significant watershed/vegetation treatment technique on the GNF. A lot of watershed/vegetation treatment burns have been tried on the GNF in the last 30 years. Few burns actually accomplished the prescribed management objective of the burn treatment over the years. Making areas black and void of organic materials may be a fuels management object but seldom does it meet watershed/vegetation management objects.

Historically much of the fine fuels and smaller organic materials located on the soil surface were left to be incorporated into the soil. These “fuels” were left to be decomposed by microorganisms, where the resulting broken-down lignin and cellulous carbon-based molecules became incorporated into the soil as valuable plant nutrients. The microbe decomposed “fuels” provided critical carbon-based soil organic material that is an important link in the “Carbon Cycle” which is key to all plant growth.

**Requested Action:** It is requested that a variety of management techniques for restoration of vegetation be kept on equal footing with the use of fire and not branded as too expensive or too hard to accomplish; thus, not considered or used.

1. *The Gila does not compete well for funding for more expensive mechanical treatments, because of its remoteness and the area’s low population density. The funding necessary to mechanically treat large acreages tends to go to national forests close to urban areas and the designated municipal watersheds those large population centers depend on. (First and second sentences, second paragraph, page 7)*

**Concerns:** In the past a major portion of mechanical treatments were funded from outside funding sources such as the sale of timber, forage and other forest products or the treatments were actually accomplished by the work that provided these products to the public. Even many recreation activities and special uses of National Forest Systems lands once returned funds that could be used to enhance conditions on National Forest Systems lands.

 “KV” and “Brush Disposal” funds were collected from the revenues derived from the sale of the timber and or forest products. These funds were the primary source of funding for both “fuels management” and “watershed/vegetation treatments” on hundreds of acres on the GNF each year. These laws allowed the collection and use of funds for land treatments and are still in effect. The problem is the harvesting and use of forest products from the GNF has been reduced to near zero. There should be an effort put forth in the Revised GNF Plan to, once again, harvest forest products on the GNF instead of planning to make fire the primary treatment tool where these forest products are converted into carbon dioxide and spewed into the atmosphere.

It is true that competing for funding for land treatment projects on National Forest System lands has become a political exercise. The Bush administration tried to deal with this situation when it developed and implemented the “Healthy Forest” initiative where “fuels” treatment in the wildland urban interface (WUI) became the priority for funding.

While the GNF has focused some of its “fuels” treatment work towards the WUI areas, it does not appear that the GNF has done a very good job tying fuels treatment with watershed/vegetation treatment and then finding opportunities to accomplish these multiple benefit projects in the high priority WUI areas. Multi-function treatment projects in high priority WUI areas need to be identified through a multi-agency coordination effort to be competitive in today’s political environment. The GNF needs to become better at working with cooperating agencies and all types of forest users’ groups if it wants to become competitive for funding.

**Requested Action:** The GNF needs to look into improving their efforts for multi-agency/multi-landownership planning and implementation of land treatment projects, especially in the WUI areas. The GNF needs to look into taking advantage of the multiple land treatment funding sources that are available through cooperative planning and implementation efforts. (i.e. Community Wildfire Protection Plans, Multi-agency/Multi-land ownership Watershed Plans).

Promoting and depending on the use of fire as the primary land treatment technique on the GNF will only make it harder to get funding for mechanical treatment projects in the future. As explained above mechanical treatment projects are often the most appropriate method to restore and/or enhance National Forest System lands.

1. *From an ecological standpoint, fire is the primary restoration tool because the Gila landscape evolved with frequent fire. It is a natural ecological process that helped shape the national forest’s plant and animal communities, watersheds, and hydrology before the fire suppression era began. But now, because the lack of fire on the landscape has contributed to higher tree densities, restoration with fire is like surgery with a chainsaw, trade-offs abound, and it is all about water. (The last three sentences, second paragraph, page 7)*

**Concerns:** The landscapes that makeup the GNF may have evolved with fire, and in the past these landscapes may have been dominated with plant communities, soil conditions, watershed conditions and ecosystems that were indicative of periodic fires burning through the area. The one thing that is not clearly stated in the above issue statement is that all of this “natural ecological process” took place prior to man greatly influencing the landscapes that make up the GNF. Much more than just an era of fire suppression has occurred on the GNF since the “frequent fire” days.

The Forest Assessment leading up to the forest plan created a focus on pre-European settlement conditions that have not existed since that period in time. This is due to a recorded change in the climate that at the time of European settlement was coming out of an extended dry period. It is also recorded that Indians deliberately lit low intensity fires as well as a regular cycle of naturally occurring lightning ignited fires. These created burn cycles between two and seven years in the ponderosa, dry mixed conifer and woodland communities.

These fires maintained the ponderosa and dry mixed conifer and woodland density in the park like condition described and photographed by the early European settlers. In the spruce/fir/aspen uplands limited area blowout fires occurred on a one hundred and fifty to 200 years creating a mosaic of differing successions.

Nature is not always a friend of man. It may be noble to want to go back to the “natural” landscapes that are thought to have once occurred; and allow “nature” to manage the GNF the way it is believed to have occurred years ago, but the reality is the landscapes that make up GNF need to be managed as they occur today with man’s past influences being the reality.

It is true that many acres on the GNF are dominated by dense stands of trees and shrubs. It is also true many of these stands, due to their age, are becoming decadent and much more prone to burn especially during drier years. It is also true, as stated above, *“restoration with fire is like surgery with a chainsaw…”* With all of this said, using fire as the primary tool for treating the current fuel load and the degraded soil and watershed conditions on the GNF makes about as much sense as burning your house down so you won’t have to worry about your house burning down.

**Requested Action:** Do not depend on the use of fire as the primary tool for landscape restoration on the GNF. The recent large and very destructive fires on the GNF show that fire is not a controlled method for treating landscapes and fire often results in negatively and severely altering the landscapes that were to be treated.

While fire can be used to reduce fuels at the landscape scale at a much lower cost, fire needs to be considered as the hammer in the restoration toolbox. Fire can be a restoration tool, but like using a hammer, things can go wrong quickly, and unintended irreversible damage is often the result.

1. *Past and current management actions, inactions, and a changing climate have contributed to ecosystem and watershed departure from what is known about the historic range of variability. For example, past fire suppression and historic overgrazing contributed to altered fire regimes and other ecological processes. Legacy issues associated with past management remain evident in many places. These issues include woody vegetation encroachment into grasslands, infill of forest and woodland openings, increased tree densities within forest and woodland patches, altered distributions of vegetation structural states and species composition, and impaired soil conditions. (Last paragraph on page 7)*

**Concern:** As stated in the above issue statement, on many acres of the GNF the current soil, watershed and vegetative conditions are very different than the desired conditions described in the plan and are totally outside of what is described as the historic range of variability. (See figure 1) Many areas no longer have the soil structure, depth, nutrients and water holding capability to ever return to be within the defined range of variability or what is believed to be the desired natural state. Deep gullies exist that lower the water table in the once highly productive valley bottoms. Many hillsides that once supported stands of perennial grasses are now rocky, shrub and tree-covered slopes. While the GNF draft revised plan recognizes this situation, it is unclear how this situation will be addressed in the future.

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**Figure 1: Alma, New Mexico looking west circa 1920. Note an almost total absence of trees and other riparian vegetation along the river as well as very limited piñyon/juniper woodlands on the hills.**

**Requested Action:** It is suggested the GNF revised plan recognizes that many highly degraded acres on the GNF will never return to a condition that is within their once historic range of variability and that these areas can at least be managed to provide resources that are beneficial to man. It is hoped the rocky tree covered slopes can continue to provide a source of fuelwood for the public and the valley bottoms that are dissected by deep eroding gullies can be treated; and while they may never return to be a wetland, they can be managed to produce forage for livestock and wildlife.

1. *Past fire suppression, historic overgrazing, and other activities have disrupted many natural processes, such as wildfire and natural vegetation succession. (First sentence in the Ecological Changes section found on page 9)*

**Concern:** Just about everyone will concede that historic overgrazing and other activities that occurred during the settlement/homestead era *(late 1880’s early 1900’s)* disrupted many natural processes such as natural vegetation succession on the GNF. The lumping of fire suppression into the same category of a disruptor of natural processes as what occurred in the late 1880’s on the landscapes that make up the GNF is very misleading and more of a politically correct theory than fact based.

It is also difficult to understand how “*wildfire”* is a desirednatural process for the GNF when it impedes and often destroys *“natural vegetation succession”.* Natural vegetation succession results in dynamic and diverse plant communities, healthy and functioning ecosystems, functioning watersheds and highly productive soils that are the desired natural functions valued by man and called for in the Draft Plan.

Just because fire is causing the disturbance, it does not mean the resulting impacts are beneficial or natural. Not all fires burn with the same intensity and both managed-fires and wildfires can have a wide range of impacts on natural vegetation succession, especially when the landscapes that are burned are not in a natural state when a fire occurs.

Under the current man-induced unnatural setting of overstocked forest, and the heavy accumulations of fuels recent extremely intense, super-hot, wildfires have had an unnatural and severe impact on large blocks of the GNF. Along with these recent man-induced extremely intense, super-hot wildfires, which have impacted large blocks of the GNF, many previous man-induced ecosystems that are not within their natural range of variability currently exist and are the reality that the future management of the GNF needs to address.

In time it will be recognized that these unnatural and severe impacts have not only altered the natural vegetative communities, but also have altered the desired soil and watershed functions on thousands of acres of the GNF. The use of fire as the primary treatment tool on the GNF under most circumstances will only further interfere with the natural carbon and water cycles that healthy ecosystems depend upon to exist.

The adverse impacts of fire are nothing new and have been documented for many years. Unlike the impacts of improper logging, grazing and other man-induced disturbances, fire can and has historically altered entire landscapes in just a few hours or days.

**Requested Action:** Rewrite the statement identified in issue 6 to make it clear that wildfires burning under unnatural conditions can and have resulted in unnatural impacts that are way beyond the historic range of natural variability.

1. *To effectively manage to achieve desired conditions of a forest resource, project planners and decision-makers must ensure that they use the entire plan and not just the forest plan components listed for that resource. Effective integrated resource management recognizes the interdependence of ecological, social, cultural, and economic resources. (Second paragraph on page 16)*

**Concern:** The District strongly agrees with this statement and hopes it will be a driving force in the future management of the GNF

**Requested Action:** No change to the draft plan is required.

1. *The previous discussion about landscape scale heterogeneity and plan content for vegetation and fire management can support resilient watersheds, although careful consideration of disturbance type, frequency, magnitude and intensity or severity will be required to maintain a balanced approach. (Third sentence of the third paragraph page 20)*

**Concern:** The District agrees that careful consideration of disturbance type, frequency, magnitude and intensity or severity will be required to maintain a balanced approach to management of the GNF, especially when dealing with the use of fire as a treatment or restoration tool.

**Requested Action:** No change to the draft plan is required.

1. *Although this topic is little studied, those studies that have been conducted demonstrate that areas that have filled this role previously are actually more likely to experience stand-replacement fire in subsequent wildfires. This implies mechanical treatments may be necessary to maintain some refugial areas. (Last two sentences of the second full paragraph on page 21)*

**Concern:** As is prescribed in the last sentence of this statement the District agrees that mechanical treatments may be the best and safest way to treat critical refugial areas on the GNF in the future. The District also believes that mechanical treatments should be the preferred treatment option for all areas of the GNF.

**Requested Action:** No change to the draft plan is required.

1. *Herbicide is often the only effective tool to control, contain, or eradicate noxious weed species due the characteristics of the species themselves and logistical and economic considerations. When treating native re-sprouting alligator juniper or evergreen oak species, the purpose is to add herbicide to “the toolbox” with its use being determined through an interdisciplinary process considering lessons learned and economics. (First and second sentences, paragraph 4 page 23)*

**Concern:** The District supports the use of herbicides as a tool to treat noxious weeds and alligator juniper or oak species on the GNF.

**Requested Action:** No change to the draft plan is required.

1. *The plan components developed for upland vegetation are based on Ecological Response Units (ERUs). ERUs represent a classification system based on vegetation characteristics that would occur when natural disturbance regimes and ecological processes prevail. (First sentence, second paragraph, page 25)*

**Concern:** The District has a concern that the ecological classification system for the updated GNF Plan is based upon, as stated above, “*vegetation characteristics that would occur when natural disturbance regimes and ecological processes prevail*.” This approach to ecological classification is not founded upon the reality of past human disturbances, the current man-induced ecological processes, nor the vegetative communities that exist today.

The desire to manage the GNF upland vegetation as Ecological Responses Units (ERUs), which are based upon **natural** disturbance regimes and ecological processes, is a substantial change from how the GNF has been managed in the past. As is noted throughout the draft plan, the desired natural processes have not been occurring for well over 100 years on most of the GNF. This concept, while noble, is not in line with reality.

Man, and his need for food, fiber, water, space, and a purpose for being, will continue to interfere with natural disturbance regimes and ecological processes as long as the public is dependent upon the landscapes that make up the GNF for the multiple use and sustained yield of resources. If natural disturbance regimes and ecological processes were to prevail, the most logical management for the landscapes that make up the GNF would be to designate the entire GNF as “Wilderness”

**Requested Action:** With a predetermined desired natural ecosystem concept (presented as ERUs) being introduced and implemented in the draft GNF plan, it would be reasonable to also present the expected future ecosystem characteristics (ERUs) under continued multiple use, sustained yield management. 36 CFR 219.10 requires that: “*While meeting the requirements of §§219.8 and 219.9. a plan developed or revised under this part must provide for ecosystem services and multiple uses, including outdoor recreation, range, timber, watershed, wildlife, and fish, within Forest Service authority and the inherent capacity of the plan area…”*

1. *However, it is expected that more acres will be treated with prescribed and naturally ignited wildfire for two reasons. First, the cost per acre is lower which will facilitate more acres of treatment being realized. Secondly, mechanical treatments may mimic some of the ecological outcomes of fire and may facilitate the restoration of fire to the landscape but they cannot replace an ecological process. (Last three sentences, third paragraph, page 28)*

**Concern:** As has been presented previously, the District is concerned that fire will be the primary tool for the future treatment of the landscapes on the GNF. When, as stated above, “*it is expected that more acres will be treated with prescribed and naturally ignited wildfire”* the opportunity for anyone except the Forest Service to be involved in treatment projects will be greatly limited.

The idea that, as stated above, *“the cost per acre is lower, which will facilitate more acres of treatment being realized”* does not take into account the use of any funding sources except appropriate tax dollars. The use of fire to treat landscapes does not yield any forest products that could generate funds that could be available for the treatment of fuels, restoration of functioning watersheds and restoration of diverse vegetation communities. As explained in above comments, the generation and sale of forest products in the past fund much of the land treatments done on National Forest System lands across the West.

As stated throughout the draft plan, appropriated funding for treatment projects is currently very limited, and the GNF does not compete well for appropriated funds. Expecting, as stated above, “*more acres will be treated with prescribed and naturally ignited wildfire”* is counterproductive to finding multiple funding sources and providing for the social, economic needs of the local community.

The idea that, as stated above, *”mechanical treatments may mimic some of the ecological outcomes of fire and may facilitate the restoration of fire to the landscape, but they cannot replace an ecological process.”* appears to be an attempt to justify the use of fire based upon a personal value judgment. (“*but they cannot replace an ecological process”)* What is so terribly wrong with that?

This statement indicates that emotional feelings and political correctness are more important than the condition of the GNF. What difference does it make how properly functioning and healthy ecosystems become established and make up the landscapes found on the GNF. While man’s influences are blamed for much of the degraded conditions on the GNF, what says man’s influences can’t provide the desired future conditions that are called for in the revised GNF plan. It appears degraded watershed, soil and vegetative conditions due to “natural processes” are acceptable, but functioning watersheds, stable and productive soils, and healthy self-sustaining productive vegetative communities that are the result of mechanical treatments and man’s efforts are not acceptable.

**Requested Action:** Reconsider making everything pertaining to the future management of the GNF politically correct. Allow the use of long established and proven treatment techniques on the GNF even if they are not considered to be an ecological process and politically correct.

1. Multiple statements under the Forest-wide Plan Direction section.
	1. *Soils- When management results in accelerated soil loss, these soil functions are altered or impaired, and ecosystem services are reduced. While some soil functions or a degree of soil function may be recovered within a human lifetime, soil itself is essentially a non-renewable resource due to the time it takes for soil to form. It has been estimated that in the water-limited Southwest, it can take 300 to 1,000 years to form an inch of soil. (Third paragraph page 76)*
	2. *Water Quality- Nonpoint source pollutants are the primary source of water pollution in the State of New Mexico and in the Gila NF 1. Point source pollutants can be traced back to a single point, such as a pipes or ditches from industrial or sewage treatment facilities. Nonpoint source pollution is caused by water moving over and through the ground and carrying natural and human-made pollutants into streams and water bodies and remains the nation’s largest source of water quality problems. (First three sentences, paragraph three page 81)*
	3. *Watershed- Watershed condition is integral to all aspects of resource management and use. Good watershed management maintains the productive capacity of soils, protects water quality and quantity, sustains native species, provides for state-designated beneficial water uses, and reduces the threat of fire and flood damage to Forest Service infrastructure and downstream values. (Last paragraph page 83)*
	4. *Riparian and Aquatic Ecosystems- More than half of the Gila NF’s riparian and aquatic ecosystems are not properly functioning because of one or more of the following reasons:*
		1. *non-native invasive aquatic species.*
		2. *alterations in the amount, timing, and duration of water flows due to drought, diversions and withdrawals, or post-fire effects.*
		3. *poor water quality related to excessive sediment or temperature.*
		4. *riparian and wetland vegetation conditions resulting from drought, fire or post-fire effects, excessive herbivory by elk, livestock, or both; and*
		5. *degraded channel shape and function resulting from the same factors impacting riparian and wetland vegetation conditions and alterations of water flow.*

**Concern:** The District is concerned that the management of these very basic resources and the vital functions they provide for maintaining the productivity of the GNF are not given the proper emphasis in the draft plan. The emphasis on “natural processes” such as fire, insect damage, erosion, floods etc. to create a desired level of disturbance for achieving the desire future condition of the ERU’s on the GNF is difficult to understand.

Natural disturbance events such as wildfires, hurricanes, tornadoes, floods, and droughts; along with the explosions in the population of insect and other vegetation destroying organisms, have altered and most often degraded the condition and function of watersheds, soils, and vegetative communities for millions of years. These “natural processes”, which now appear to be a desirable method of resource management to some, will not support the desired future conditions found in the draft plan nor the desires of the overall local human community. The idea that human activities and human management of the GNF landscapes will cause devastating “unnatural” disturbances, which is detrimental to healthy ecosystems only leads to the feeling that people are no longer welcome on the GNF.

**Requested Action:** The GNF needs to reconsider their dependence on “natural processes” as the avenue to achieving their desired future conditions. More emphasis needs to be placed on the use of well planned, science-based, and proven management and treatment techniques when addressing the basic resource needs and the vital functions of the watersheds, soils, water quality, and key vegetative communities (such as the riparian/aquatic ecosystems) on the GNF.

1. *Relationships are a key factor that can influence the success of how the forest plan is implemented. With the challenges the forest faces today, strong working relationships with all stakeholders, partners, and volunteer groups are vital to increase capacity and help meet desired conditions to care for the land and serve the people. (Fourth paragraph page 122)*

**Concern:** The District strongly agrees with this statement and hopes it will be a driving force in the future management of the GNF. Positive relationships are key to implementing and accomplishing the future management of the GNF.

**Requested Action:** No change to the draft plan is required.

1. *Whether wildfire or prescribed fire, the direct and indirect effects of any one fire are rarely all positive or all negative. Fire can restore or maintain landscape heterogeneity and vegetation structure, or it can reduce landscape heterogeneity or fragment habitat. It can increase nutrient availability, or it can result in a loss of nutrients and soil productivity. It can accelerate erosion and sediment delivery to streams, or reduce the risk of future undesirable fire effects, or both. It can result in the loss of carbon, but also increase the ability of the system to sequester carbon. The potential for any of these effects depends on many variables, including but not limited to fuel and weather conditions, topography, and management decisions. Fire effects are also cumulative and interact with previous or subsequent effects of other activities and disturbances in beneficial or detrimental ways. For example, watershed impacts and recovery time increase when two high-severity fires occur on the same piece of ground with insufficient recovery time between. On the other hand, multiple fires within an area over time can limit fire size, intensity, and undesirable fire effects. (Fourth paragraph page131)*

**Concern:** It is clear when reading the above issue statement that fire can have both positive and negative effects. When using fire to reduce fuels, it is almost always the most cost-effective and efficient tool that can be used, but as described in the above statement, fire is also known to have significant adverse impacts to watershed/vegetation conditions.

Fire is not a tool that can be used to selectively target any particular individual or group of plant species. Fire is not a tool that can be used for treating the many re-sprouting plant species that are found on the GNF.

Fire always results in the loss of carbon from the burned area and any increase in the ability to sequester carbon seldom replaces the carbon that was lost in the original fire treatment not to mention the amount of carbon released into the atmosphere. Fire almost always results in the long-term loss of nutrients and soil productivity even though there is usually a short-term spike of plant growth following a burn. There are many more adverse effects to native ecosystems that result from fire.

The concern the District has with the GNF desire to use fire as a primary tool to restore or maintain “natural” watershed, soil and vegetation functions on the landscape is that fire has not been proven to be a consistent and reliable treatment tool. There are multiple recent fire scares on the GNF where naturally ignited wildfires were put into an appropriate suppression category where they would be monitored. These monitored/managed wildfires resulted in an intense, and very destructive, catastrophic wildfire. When and to what degree these current fire scares will again provide the ecosystem functions they once did are unknown. Now there is a high risk that these fire scared landscapes will become invaded with non-native plant species and possibly invasive noxious weed species.

The best available science clearly presents the known and proven risk of burning even the most “fire adapted” ecosystems. While the GNF treatment toolbox still contains many long known and proven tools to restore and maintain “natural” landscapes, it appears the cost and ease of doing landscape treatments, not the effects of the treatment, will determine the treatment tool used.

**Requested Action:** Reconsider making ecosystem restoration and treatment decisions based upon the cost and ease of doing the treatments. Allow the use of long proven and tested restoration and treatment techniques on the GNF even if they are not considered to be a natural ecological process and are no longer considered to be politically correct.

1. *Alternately, livestock grazing can compete with fire restoration objectives because the fine fuels necessary to support fire occurrence, spread, and flame lengths sufficient to thin stands, is also the forage crop grazing permittees depend on. There are times and locations where a lack of adequate fuel loading is the challenge to restoring the natural role of fire. (Second paragraph page 142)*

*Livestock use provides for conditions that support movement toward natural fire regimes. (Second item in Desired Conditions list)*

**Concern:** These two statements raise many concerns due to the fact the future management on the GNF appears to be heading towards a higher priority on burning the native grassland vegetative communities than providing forage for livestock and wildlife. These statements set the stage for a future increase in grassland wildfires which easily spreads and burns with enough intensity to destroy not only the shrub and tree vegetative component but also many of the grassland plant species found in the grassland ecosystems on the GNF. A fire that burns with flame lengths sufficient to thin shrubs and trees stands will be hot enough to remove many of the climax grass species that are not well adapted to fire.

It has been shown multiple times in various studies and through rangeland management practices that healthy grassland communities out-compete and prevent the invasion of woody species over time. It is only after events like years of severe overgrazing or intensely hot or repeated wildfires that woody species become established where natural climax grassland plant communities once existed. The idea that fire inhibits shrub and tree establishment over the long term in grassland ecosystems is not supported by research or current proper grazing management practices.

Through “tree-ring” research it is now a common belief that fire thins stands of shrubs and trees in forested ecosystems. This usually occurs where the fuels that support wildfires are duff layers and/or dead woody material. This fire related thinning of shrubs and trees is not a long-term change in these forested ecosystems and periodic fire has to occur for any long-term result to exist.

Through “tree-ring” research it has been shown that the fire adapted ecosystem natural processes that occur mostly in the ponderosa pine forest ecosystems never lets these ecosystems advance into their true climatic stage due to the reoccurring disturbance. Reoccurring disturbance and the fire adapted ecosystem natural process that is documented in the ponderosa pine forest does not necessarily lead to the desired condition, the desire natural functions and/or the desired ecosystem health for most woodland and grassland ecosystems on the GNF.

A healthy grassland community that is made up of a wide variety of native grass species takes many years to develop. These unique ecosystems develop through years of competition between plant species and do not develop, nor are they maintained, in a disturbance-dominated situation. Low succession stage grass communities in the southwest that are dominated by species such as blue grama and Arizona fescue are fire adapted ecosystems, but a highly productive native multi-species grassland ecosystem is not a fire adapted ecosystem and can be easily destroyed by fire.

**Requested Action:** The District would like to see the future management of the GNF more in line with the desires and needs of the people who live and depend upon the GNF and not so driven by the desire to restore the natural role of fire. There are many examples on the GNF where fire has not resulted in a historic healthy and functioning ecosystem especially in the long-term. Most of the recent wildfires on the GNF have destroyed healthy and functioning ecosystems and it will take hundreds, if not thousands of years for these climax ecosystems to ever return to the GNF landscapes. If the GNF turns everything into a fire adapted ecosystem where periodic fire occurs, climax ecosystems will be a rare feature on the landscape.

1. *Livestock management will be compatible with carrying capacity and address ecological resources (such as forage, invasive plants, at-risk species, soils, riparian health, and water quality) that are departed from desired conditions, as determined by temporally and spatially appropriate data. (First item in the Standard list on page 143)*

**Concern:** The above statement does not need to be presented as a Forest Plan Standard. The stocking of GNF allotments within the carrying capacity and the other requirements presented above are what make up proper management of livestock grazing, which is required in Forest Service Manuals and Handbooks, Term Grazing Permits, Allotment Management Plans and multiple other documents. The above statement could easily lead a reader to believe that livestock management on the GNF has been and is still unregulated and without the proper oversight of professional rangeland managers.

**Requested Action:** Reword the above grazing management Forest Plan Standard so it does not indicate *“ecological resources (such as forage, invasive plants, at-risk species, soils, riparian health, and water quality) that are departed from desired conditions…****”*** are a common occurrence on the GNF. There are many well managed allotments that are made up of healthy and productive ecosystems on the GNF and the future management of allotments where ecological resources are departed from desired conditions have been or will be addressed through site specific NEPA analysis.

1. *Existing livestock handling, and watering facilities located in RMZs should be modified, relocated or removed where an interdisciplinary team determines they are incompatible with movement toward desired conditions for other resources. Any modification, relocation or removal of infrastructure may not impede the use of permitted water rights recognized by the State of New Mexico. (First item in the list of guidelines on page 143 &144)*

**Concern:** The modification, relocation or removal of existing livestock handling, and watering facilities located in RMZs due to them being incompatible with movement toward desired conditions for other resources as determined by an interdisciplinary team will lead to much controversy and mistrust.

Most livestock handling, and watering facilities located in RMZs have been in place for many years and have not adversely impacted other resources. With this new guideline being brought forward in the revised Forest Plan an interdisciplinary team will soon be able to interfere with the current livestock management activities on most allotments. Livestock handling, and watering facilities, whether located in RMZs or not, play a key role in the management of an allotment and their location is often key to making livestock management successful, especially in rough or isolated locations.

While the guideline does not address who will bear the cost of modifying, relocating or removing existing livestock handling, and watering facilities located in RMZs, the cost should not be the responsibility of the livestock operation. Neither the allotment permittee nor the Forest Service rangeland management program should be held responsible for satisfying what will most likely be a very minor but politically correct desired condition that benefits another function.

**Requested Action:** Remove this bias, unnecessary and potentially highly controversial guideline from the revised Forest Plan. If found to be necessary address the construction and maintenance of livestock handling and watering facilities on a case by case basis when developing or updating the allotment specific livestock grazing management plan.

1. *Vacant allotments should be considered for temporary use by holders of a current permit during times or events when their allotment(s) require growing season recovery time because of wildfire or other disturbance, or to minimize livestock and wildlife conflicts. (Sixth guideline found on page 144)*

**Concern:** No one will disagree that vacant allotments, when possible, should as stated above, *“be considered for temporary use by holders of a current permit during times or events when their allotment(s) require growing season recovery time because of wildfire or other disturbance.”* What is more important than worrying about “require growing season recovery time” which often is not necessary, the GNF needs to consider the need for providing forage for the permittee whose operation is dependent upon the use of their GNF Allotment(s).

Often time following a wildfire or other disturbance such as a prescribed burn, planned and appropriately timed grazing immediately following the disturbance is very beneficial for treating the re-sprouting shrub species so they do not dominate the site in the future. Also planned and appropriately timed grazing immediately following a fire can be a tool to suppress the invasion of the site by non-native grass species such as Lehman’s lovegrass and other undesirable species of grass, forbs and shrubs.

Another thing the GNF has been very reluctant to address or consider is using “Vacant” allotments to resolve long-term problems. These problems could include situations where very low forage production lands make up most of an allotment. Also, allotments that are uneconomical to graze in today’s economy could be retired from grazing without putting current GNF permittees out of business. Combining or reconfiguring existing allotments or moving term permit obligations to a “Vacant” allotment in order to graze the most productive rangelands instead of relying on unsuitable or very poor condition rangelands could resolve many current and future resource problems.

There are multiple critical public safety and TES species management situations on the GNF that could be easily resolved on the GNF if the GNF Forest Plan would consider using “Vacant” allotments to resolve these long standing and highly controversial problems. It seems that waiting for a lawsuit to be filed and then spending the time and money to deal with an unwinnable situation is the direction the GNF is taking instead.

Cattle moved to unfamiliar pastures historically loose weight and are severely handicapped in supporting offspring, resulting in calf crop reduction and loss of mother cows. As such the forest plan should not take the position that generating open allotments for times of fire threat as a satisfactory insurance stance.

**Requested Action:** Establish in the revised Forest Pan the option to address long-standing rangeland conflicts and resources issues by combining or reconfiguring existing vacant allotments with current active allotments; or by moving term permit obligations to the productive and accessible potion of vacant allotments. Caution should be exercised in encouraging temporary movement of livestock to vacant allotments per our above concern.

1. *All monitoring data collected by non-Forest Service personnel that adhere to protocol identified in the plan-level monitoring implementation guide should be accepted for consideration and made available to permit holders for allotment management. (Eighth guideline found on page 144)*

**Concern**: The use of non-Forest Service personnel to collect livestock grazing and rangeland health related monitoring data should be closely scrutinized and should involve the holders of Term Grazing Permits on the GNF before any decision is made. This guideline would set a very dangerous precedent concerning the use of the “best available science” especially if grazing related monitoring data is collected by someone that is not a journeyman level professional rangeland manager.

Accepting monitoring data from anyone just because its collection adhered to the protocols identified in the plan-level monitoring implementation guide does not mean it is accurate and dependable. It is very easy to let one’s personal bias corrupt almost any type of monitoring data especially when someone is not properly trained and does not have experience collecting plant community related data. Collecting accurate data related to the production and health of vegetation is especially difficult due to the tremendous number of variables that are involved.

**Requested Action:** Only accept rangeland monitoring data collected by a journeyman level professional rangeland manager or someone who is trained and closely supervised by a journeyman level professional rangeland manager.

1. *Annual allotment inspections could be conducted in the field with the permit holder to facilitate discussion of any issues that may be a factor. (Last partial sentence page 145 and first partial sentence page 146)*

**Concern**: Allotment inspections, if they are going to have any meaning, mustbe conducted in the field with the permit holder. You cannot inspect something without actually observing it.

**Requested Action:** Change “could be”to “must be”in the sentence and then support the GNF rangeland management employees in accomplishing this task.

1. *The Roadless Area Conservation Final Rule (Roadless Rule) prohibits road construction, reconstruction, and timber harvest, except under certain circumstances, in inventoried roadless areas because they have the greatest likelihood of altering and fragmenting landscapes, resulting in immediate long-term loss of roadless area values. Some existing roads may be present within inventoried roadless areas. The Roadless Rule does not prohibit motorized travel on existing roads or motorized trails. (Last partial sentence on page 209 and first partial paragraph on page 210)*

**Concern:** The current 36 CFR, Part 294 Subpart B does not contain the provisions of the 2001 Roadless Rule as described above and as contained in the Draft Plan. In the July 1, 2019 revised 36 CFR, Part 294, Subpart B, it is clearly stated in §294.10: “*The purpose of these administrative procedures is to set forth a process for state-specific rulemaking to address the management of inventoried roadless areas in areas where the Secretary determines that regulatory direction is appropriate based on petition from affected Governor.”* There is no text in the current 36 CFR, Part 294, in any Subpart concerning prohibitions pertaining to road construction, reconstruction, and timber harvest within identified Roadless Areas on National Forest System lands in New Mexico.

Also, the 1980 New Mexico Wilderness Act clearly states in; “*Sec. 101, The purposes of this Act”* at § *“(2) insure that certain other National Forest System lands in New Mexico be promptly available for nonwilderness uses including, but not limited to, campgrounds and other recreation site development, timber harvesting, intensive range management, mineral development, and watershed and vegetation manipulation”.* It is further stated in “*Sec 104 (b)(3) areas in the State of New Mexico reviewed in such Final Environmental Statement* (RARE II Final Environmental Statement dated January 1979) *and not designated as wilderness, or for wilderness study by this Act need not be managed for the purpose of protecting their suitability for wilderness designation pending revision of the initial plans.”*

The 1980 New Mexico Wilderness Act further states in; “*Sec 104 (c) Unless expressly authorized by Congress, the Secretary shall not conduct any further statewide roadless area review and evaluation of National Forest System lands in the State of New Mexico for the purpose of determining their suitability for inclusion in the National Wilderness Preservation System.”*

The original 2001 Roadless Rule itself states at 294.14(a) that, *"This subpart does not revoke, suspend, or modify any permit, contract, or other legal instrument authorizing the occupancy and use of National Forest System lands issued prior to January 12, 2001. The 1980 New Mexico Wilderness Act is definitely a legal instrument that authorizes the occupancy and use of National Forest System Lands prior to January 12, 2001.*

**Requested Action:** The District would like for the GNF to reconsider their use of the original (and now deleted) 2001 Planning Rule to designate 733,836 acres of the GNF as special “Inventoried Roadless Areas” that would have special management prohibitions on road construction, reconstruction, and timber harvest.

While the implementation of the 2001 Roadless Area Rule has been litigated with multiple opposing legal opinions and injunctions being rendered, the 1980 New Mexico Wilderness Act makes it clear that all but the areas designated as Wilderness or Wilderness Study Areas by the Act were to be dropped from any further management that would protect then for future designation as Wilderness areas.

The District would also like the GNF to provide the District with references to any Acts passed by Congress since 1980, that expressly authorized the Secretary to conduct any further statewide roadless area reviews and evaluations of National Forest System lands in the State of New Mexico for the purpose of determining their suitability for inclusion in the National Wilderness Preservation System. The 2012 Planning Rule is not management direction authorized by Congress and can’t be the instrument that allows for the inventory, analysis and recommendation of Roadless Areas on the GNF for Wilderness designation.

**Comments Specific to Considerations of New Wilderness Areas Within THE SAN FRANCISCO SOIL & WATER CONSERVATION DISTRICT:**

In addition to the comments above on roadless management standards the District is requesting that there be no additional designations of wilderness lands in Catron County. We understand the Forest Service requested specific area-based comments. However, that allows the potential for areas not generating comments to be considered for wilderness designation. The following are our concerns:

**Financial Costs**

1. The Forest Service is financially handicapped to manage wilderness due to lack of funding. Any additional wilderness lands will not have ear-tagged funding that is required for management of those lands. Additional wilderness will only compound forest service budget issues.
2. Due to financial constraints any implemented, on ground, personnel support for existing wilderness is thin at best. Forest Service feasibility to generate and support management plans for additional wilderness are not funded and do not exist.
3. Designating additional wilderness lands will only compound the current financial issues with management of the Gila Forest and associated wilderness. It is important we professionally manage and fund our current wilderness before adding additional burdens.

**Ecological Costs**

1. The GNF Plan Assessment pointed out that a significant percentage of the lands are not in proper functioning condition. These conditions will require significant management actions to bring these areas into properly functioning condition. Wilderness designation restricts the management tools required to accomplish restoration. This will mean these areas will be condemned to remain in degraded condition or more likely decline in ecosystem health.

**Proposed Wilderness is eliminating Multiple Use**

1. Grazing Allotments

Allotment holders support sophisticated infrastructure requiring year-round vehicle and fuel operated equipment for maintenance. Eliminating these maintenance abilities will negatively affect allotment holders’ rights to manage herds and ultimately damage existing wildlife habitat. The referenced infrastructure list includes:

1. Fencing and corrals
2. Cattle guards
3. Water improvements, dirt tanks, steel drinkers, pumps, water distribution pipe, etc.
4. Existing Roads supporting (*emergency* and maintenance vehicles)
5. Existing erosion control ponds and dams

Eliminating any or the entire above infrastructure will affect pasture rotation affected increasing fire fuel hazards, encouraging woody species growth, reducing water supply and habitat for wildlife.

1. Recreational

All existing roads and 2 track trails are currently used by off road vehicles and passenger automobiles for hunting, limited hiking, handicapped and aged public access to overnight camping and site seeing. All of which have a positive financial footprint on the local economy. Eliminating those visiting public opportunities by restricting vehicle access will have an over-all negative impact on local business and tax base.

Both local business and the general public visitors to the San Francisco River below the confluence of Big Dry Creek South of Pleasanton, New Mexico to the Arizona border are currently experiencing the above negative recreational impact. The F/S decision to stop vehicle access to historical trails and public campgrounds for wilderness evaluation/study should be reversed.

The District looks forward to working with the Gila National Forest towards the goals of improving the natural resources of our home and production of the multiple uses from the National Forest lands.

Sincerely,



Howard Hutchinson, Chairman

1. Sec. 2. Findings.-The Congress finds that- "(3) to serve the national interest, the renewable resource program must be based on a comprehensive assessment of present and anticipated uses, demand for, and supply of renewable resources from the Nation's public and private forests and rangelands, through analysis of environmental and economic impacts, coordination of multiple use and sustained yield opportunities as provided in the Multiple-Use, Sustained-Yield Act of 1960 (74 Stat. 215; 16 U.S.C. 528-531), and public participation in the development of the program; [↑](#footnote-ref-1)
2. (c) The Secretary shall report in the 1979 and subsequent Assessments on: "(1) the additional fiber potential in the National Forest System including, but not restricted to, forest mortality, growth, salvage potential, potential increased forest products sales, economic constraints, alternate markets, contract considerations, and other multiple use considerations; [↑](#footnote-ref-2)
3. 16 U.S. Code § 475 - Purposes for which national forests may be established and administered [↑](#footnote-ref-3)
4. Federal Register Notice 36 CFR Part 219 RIN 0596-AD60 May 6, 2024

2. Amend § 219.4 by revising paragraph (a)(3) to read as follows:

[§ 219.4](#sectno-citation-219.4)

Requirements for public participation.

(a) \* \* \*

(3) *Indigenous knowledge and land ethics.* As part of tribal participation and consultation as set forth in paragraphs (a)(1)(v) and (a)(2) of this section, the responsible official shall request information about Indigenous Knowledge, land ethics, cultural issues, and sacred and culturally significant sites.

\* \* \* \* \*

3. Amend § 219.19 by removing the definition “Native knowledge” and adding the definition “Indigenous knowledge” in alphabetical order to read as follows:

[§ 219.19](#sectno-citation-219.19)

Definitions.

\* \* \* \* \*

*Indigenous knowledge.* A body of observations, oral and written knowledge, innovations, practices, and beliefs developed by Tribes and Indigenous Peoples through interaction and experience with the environment. It is applied to phenomena across biological, physical, social, cultural, and spiritual systems. Indigenous Knowledge can be developed over millennia, continues to develop, and includes understanding based on evidence acquired through direct contact with the environment and long-term experiences, as well as extensive observations, lessons, and skills passed from generation to generation. Indigenous Knowledge is developed by Indigenous Peoples including, but not limited to, Tribal Nations, Native Americans, Alaska Natives, and Native Hawaiians. Each Tribe or Indigenous community has its own place-based body of knowledge that may overlap with that of other Tribes. Indigenous Knowledge is based in ethical foundations often grounded in social, spiritual, cultural, and natural systems that are frequently intertwined and inseparable, offering a holistic perspective. Indigenous Knowledge is inherently heterogeneous due to the cultural, geographic, and socioeconomic differences from which it is derived, and is shaped by the Indigenous Peoples' understanding of their history and the surrounding environment. Indigenous Knowledge is unique to each group of Indigenous Peoples and each may elect to utilize different terminology or express it in different ways. Indigenous Knowledge is deeply connected to the Indigenous Peoples holding that knowledge. [↑](#footnote-ref-4)