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Comments: The following is an optical character recognition of the attached file, pasted by Forest Service personnel.

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August 31, 2016
RE: Cibola Forest Revision Plan/ Comment deadline August 31, 2016
To Whom It May Concern:
On behalf of the membership of the New Mexico Cattle Growers' Association (NMCGA), with members in all 33 of the
state's counties as well as 19 other states, we appreciate the opportunity to comment on the Cibola Forest Revision
Plan. Our primary concerns are that the recommended wilderness areas will not meet the definition of wilderness under
The Wilderness act and will be managed as such, that access to land for grazing will be made inaccessible by the
recommended wilderness areas and the increased risk for fire danger if these lands eventually become designated
wilderness or are treat ed as such.
The definition of wilderness under The Wilderness Act is:
(c) A wildern ess, in contrast with those areas where man and his works dominate t he landscape, is hereby recognized as an area where the earth and its community of life are unt rammeled by man, where man himself is a visitor who does not remain. An area of wildern ess is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work su bst antially unnoticeable; (2) has outstanding opportunities for so litude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain eco logica l, geological, or other features of scientific, educational, scenic, or historical va lue.
We believe that all constructed and man-made features are indeed evidence t hat areas have been "trammeled by man"
and are "permanent improvements or human habitation" and, therefore, should not be considered as recommended
wilderness areas. Lands identified as potentially suitable for wilderness would be managed under the non-impairment
policy and would result in greatly reduced access for resource management and multiple uses.

This potential inaccessibility could affect grazing allotment permit holders. The continued availability of grazing allotments is important to our membership, the economic vitality of rural economies, range health, and the customs and
culture of many people in New Mexico. It is vital that your staff consult and coordinate with all affected grazing permit
holders in the Cibola National Forest throughout this process to ensure agricultural producers retain their maximum
permitted grazing animal unit months (AU Ms) and unrestricted access needed to maintain range improvements and
manage livestock grazing on their allotments.

* For permitted livestock grazing activities in recommended wilderness areas, annual operation instructions shall be updated to reflect any motorized or mechanized use which may be required to administer terms and conditions under the term grazing permit (such as repair or reconstruction of fences, water developments) that may have been approved under exceptions outlined in Forest Service Manual 2320-Wilderness Management, section 2323.22.

*When motorized transport and mechanized use associated with grazing allotments is authorized in recommended wilderness areas, it sha ll be limited to that needed to carry out management activities of practical necessity and reasonableness, following the rationale of Forest Service Manual 2320-Wilderness Management, section 2323.2, and shall not degrade the wilderness character of the area. (pg. 80, Lines 23 - 32)

This non-impairment policy extends the protection of congressionally designated wilderness areas to recommended
wilderness areas identified in this process. It is beyond the authority of USFS to manage an area as wilderness unless and
until Congress actually designates such areas pursuant to the Wilderness Act of 1964. We ask that the standards be
edited to allow for existing motorized and mechanical access to continue at levels consistent with current grazing permits.

We would also like to point out that there is a great need to make this process a collaborative planning effort between
grazing permit holders and the Cibola National Forest. Impacted allotment owners who pay for their access and improvements on their allotments have not been included or consulted in this process that can have dramatic consequences for their families and small business. There is an overall lack of clarity in this document and its' potential
on allotment owners and land stewards. Allotment owners have a legal contract with the U.S. government and hold
waters rights under New Mexico state law. The USFS lacks any authority to manage groundwater or to place any conditions on groundwater and the property rights thereof under New Mexico law. It is not within the purview of the
USFS to manage groundwater withdrawal activity or evaluate applications for water rights. All groundwater management activities should be accomplished through the coordination of the water right holder and the New Mexico
Office of the State Engineer, not the USFS. Water used for livestock is put to beneficial use by the owner of the livestock
and is not for use by the USFS. Though wildlife often will use these watering sources, their primary function is for livestock.

New and existing water developments should be designed for both wildlife and livestock use and if practical designed and/or retrofitted to provide a year-round watering source for wildlife.

*Overflow from troughs should be diverted to allow for soil moisture recharge and creation or maintenance of wetland habitat features.

* New livestock troughs, tanks, and holding facilities should be located out of riparian areas, archeological sites, and areas that may impact habitats associated with species of conservation concern and/or core threatened or

endangered species habitat to reduce concentration of livestock in these areas. Existing facilities in water resource features should be modified, relocated, or removed where their presence is determined to inhibit movement toward desired riparian or aquatic conditions and consistent with existing water rights, water quality and quantity. (pg. 81, Lines 31- 41)

Consistent with existing water rights, Forest Service and permitted water uses, diversions, or 18 obstructions should at all times allow sufficient water to support the associated ecosystem and, in 19 streams, to preserve minimum levels of water flow that maintain aquatic life, aquatic habitat, and 20 other purposes of national forest establishment. (pg. 63, Lines 17 - 20)

Based on the information available at this time, NMCGA supports Alternative C.

Here are the reasons for we are support of this alternative:

* This alternative appears to be the best approach for preventing further and future catastrophic fires. More designation of wilderness will only lead to increasing over-growth with no way to address fires because of the "untrammeled by man" mandate in the Wilderness Act of 1964.
* Alternative C removes all Management Areas
* Any additional designations dramatically impact current tax status of lands, severely hammering the counties who are responsible for the safety and welfare of those residing in the county or visiting counties.
* Alternative C does not discriminate against those who must travel by a wheeled devise due to physical disability.
* Alternative C provides for the use of federal lands by the greatest amount of the population.
* Alternative C minimizes the number of law enforcement and other personnel needed by the government to manage additional designations. It is clear that current funding is inadequate to manage lands now under federal designation. Every effort must be made to reduce the $19 trillion debt that shadows Americans.
* Alternative C respects the custom and culture of all New Mexico ranchers, wood gathers, hunters, fishermen and many others who routinely utilize these lands.
* Alternative C respects the investments of both federal natural resources agencies and land stewards in infrastructure that supports both wildlife and domestic animals.

General comments:

* Written documentation does not match the maps provided. Maps contain areas of designation that are not mention in the written document.
* All other alternatives create additional unfunded mandates to allotment owners.
* All other alternatives present access issues for land stewards to their contracted allotments, working facilities and watering facilities.
* The location and close proximity to public highways, communities and facilities of Alternatives B, D and E are impractical to be considered wilderness and special designation options.

We greatly appreciate the opportunity to comment. NMCGA urges you to re-evaluate the recommended wilderness
areas and speak with those potentially affected if these designated lands were to become wilderness designation. If you
have any questions or concerns, please contact the NMCGA offices at (505) 247-0584 or at nmcga@nmagriculture.org.

Sincerely,

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Pat Boone
President

PAT BOONE, President, Elida; TOM SIDWELL, President-Elect, Tucumcari; JACK CHATFIELD, Vice-President At Large, Mosquero;
RANDELL MAJOR, SW Vice-President, Magdalena; DUSTIN JOHNSON, NW Vice-President, Farmington; JEFF BILBERRY, SE Vice-President, Elida;
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