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United States Forest Service

Cibola National Forest

c/o Elaine Kohrman

2113 Osuna Rd. NE

Albuquerque, NM 87113

Re: Comments on the Preliminary Draft Land and Resource Management Plan

Dear Ms. Kohrman,

New Mexico Farm and Livestock Bureau (NMFLB) submits these comments on behalf of our 18,000 member families. Our mission is to promote and protect agriculture in the State of New Mexico.

NMFLB is opposed to all proposed Alternatives in the Preliminary Draft Plan, with alternative C being the only mildly palatable alternative that could be considered with much restructure. Furthermore, we cannot support additional management areas that do not list what types of activities can or cannot occur on them. NMFLB is comprised of over 18,000 member families that hold traditions of farming, ranching and being stewards of the land. Many of our members are allotment owners and graze cattle in the Cibola National Forest; grazing can play an important role in healthy forests. Therefore, we believe imperative that even the vision statement contains language encompassing all multi-uses and most importantly the oldest use, agriculture. Activities in the management areas and additional wilderness can limit grazing activity. This can lead to overgrowth in the forest and a larger economic impact to local communities. NMF&LB supports grazing activities and multiple uses on the Cibola and all National Forest. The only thing that is explicitly applicable to grazing and multiple uses throughout this entire document is an ambiguous statement to which there is no definition of, "incorporates adaptive management toward ecosystem-based desired conditions. This statement does not contain any semblances of clear management direction nor are any of these terms so much as defined in the glossary of this document. This leads me to questions and concerns, as this is an agency that's conduct is based on rules and parameters.

As part of the NEPA process public meetings held throughout the showcasing of this document, not the development, but the meetings involved the general public, however, allotment owners who have a vested interest in the forest and hold a binding contract for their allotments and should have been, but were not notified separately so that they may participate with real claims at stake. As changes to allotments and accessibility highly affect allotment owners, NMF&LB strongly encourages the Forest Service to make every attempt to work with allotment owners and not solely supporting organizations. That leads me to even more alarming concerns as it pertains to the tables, development and implementation, or lack there of in this document. There are many references to "seral-stage proportions," none of which are actually applicable without such language as, landscape-scale and effective ranges of management. These numbers contained in most tables are simply nothing more than that of a mathematical equation produced by scores given to components of the landscape and placed into a logarithm. There is always margin for error when using this type of human to technology based production and it should be noted, as well as a given range of objectives provided. All of which of these figures and desired scales are subjective, non-repeatable and qualitative. This document should absolutely be

disqualified unless it was restructured to contain natural ranges of variability. Furthermore, there is little to no data or citation to corroborate assertions at the landscape-scale. At other points in the document there is reference to the desired conditions -in specifically the soil condition, there is no point of reference as to how this is quantified or derived. With no regard to Proper Functioning Condition (PFC) it leads me to wonder how any USFS employee is going to really subjectively assert the desired conditioning.

Additionally, several of the areas on the inventory map are listed as possible areas of critical concern and are greater than 5,000 acres. A wilderness is defined under the 1964 Wilderness Act as "an area where the earth and its community of life are untrammelled by man, where man himself is a visitor that does not remain." Many of the potential wilderness areas are in fact not "untrammelled" by man. Several maps and polygons listed in the Preliminary Draft do not meet wilderness characteristics yet are still listed, as potential designated wilderness not once is there any indication that scientific method or a set of data has been applied, purely subjective.

NMF&LB requests the Forest Service re-evaluate the maps as well as review them to verify if they indeed meet wilderness characteristics or adhere to process of repeatability and not conjecture when it applies to decisions of such gravity. Contrary to the belief of the USFS, cattlemen have to tend to their cattle, past and range in order that they maintain a viable landscape capable of sustaining and supporting growth for years to come. This requires the need to enter the forest and satisfy the requirements of the allotments while maintaining a healthy balance with all species in the landscape. Designating wilderness areas in the Cibola National Forest where allotment owners graze, not only makes it near impossible to continue grazing, it also makes it very unsafe. Due to prohibiting mechanized rules contained in the protocols of wilderness areas, individuals may suffer greatly when faced with a life threatening injury, catastrophic events such as fire or flood. The hands-off approach to management that comes with large-scale designations is the most unsafe, unfit way to manage lands. Agriculturists have long been the stewards and excellent ones at that, there should be a bond and good working relationship between the managers (USFS) and the stewards in order that the forest are managed for the best possible and safest outcomes for all people.

Special events occur less and less frequently in the areas of the forest due to regulations, safety and poor management. Within the Mount Taylor area, people gather for bike riding, snowmobiling and a particular event called "The Quad." Motorized vehicles are used to provide medical services for this event. Should this particular area be designated wilderness, this event cannot take place. Mount Taylor has also been used for uranium mining; these particular areas should not be listed as potential wilderness or special management area. There should as it is stated by the constitution be limited powers of government and not increased control.

Water is another instance of this documents overreach as there are many references to the USFS applying for or obtaining water rights, water developments and controlling the installations of specific devices. This is neither the place of the USFS nor is it within the legal bounds/parameters of the federal government to limit or obtain water on states lands. This is an egregious power grab by the drafters of this document and a complete disregard for permittees rights as owners. Specifically regulating and monitoring water, is addressed throughout the Preliminary Draft Plan and supporting documents, but not once is reference given to how the USFS plans to legally obtain such authority over the state other than to assert that in this document. If this be the case than it should invoke litigation on behalf of the state to limit the powers of the federal government. Managing groundwater quality should not be the responsibility of the National Forest Service. Regulating water management and water rights is the responsibility of the New Mexico Office of the State Engineer and should remain that way. Monitoring techniques of riparian areas is very vague with no natural range cited or supporting documents here again is another blatant disregard for PFC. NMF&LB requests that the Forest Service work with the Range Improvement Task Force in monitoring riparian areas and developing grazing management tactics most beneficial for all things in the landscape, instead of a total departure from multiple use management. Prohibitions of certain types of livestock based on instances from geographic areas much different than this one are baseless and should be removed, specifically as it applies to domestic sheep. There should never be blanket prohibitions in documents such as this, as this is purely a guideline comprised of natural ranges and potential outcomes. Assertions that one species is more threatening to the landscape need to be supported with direct evidence and founded in scientific data specific to that region and those species contained within.

The implementation of the State Wildlife Action Plan (SWAP) as a management reference needs to be removed from the Preliminary Draft Plan as it is duplicitous and in direct conflict of interests. SWAP is not a regulatory

document and should not be utilized as such, it is a subjective, suggestive document designed purely for the goal of obtaining funding to implement states projects. Under Management Approaches, the Preliminary Draft Plan states, "It is important to recognize at the project level the importance of connectivity, and the best available science and tools (including but not limited to the New Mexico Crucial Habitat Assessment Tool, New Mexico Department of Game and Fish State Wildlife Action Plan, U.S Fish and Wildlife Service)." NMF&LB again requests the Forest Service works with the stakeholders and other wildlife-science specific groups, as well as New Mexico Range Improvement Task Force as a best available science in habitat management and development objectives in order that the best possible outcome be reached and there be concurrence on objective approaches.

The Multiple-Use Sustained-Yield Act of 1960 creates the need for which the national forests "are established and shall be administered." The Act directs the Secretary of Agriculture to administer all forests on a multiple-use and sustained-yield basis. It is no wonder that when the Forest system was established it was established under the Secretary of Agriculture as the case was then and has always been agriculturists are some of the best stewards of the lands and wildlife. This document is a complete and total departure from this multiple-use standard and as such should be dispensed with and recomposed with actual stakeholders and those with a real vested interest in the lands.

It is evident that the USFS is in need of field surveying in the Cibola National Forest to verify the areas that meet the definition of wilderness characteristics under the 1964 Wilderness Act. This process will limit if not omit the potential areas that may qualify for inventory. Several areas listed have been and continue to be utilized by people in their daily lives, traditions, beliefs and heritages. It would be a sad moment for this state to surrender such an amazingly abundant, replenishing resource to over-regulation and mismanagement.

NMFLB is aware there is a need to revise the current Forest Plan. Per your letter dated February 3, 2015 you stated, "the revised Forest Plan will provide strategic direction and framework for decision making during the life of the plan. The authorization of project-level activities will be based on the guidance/direction contained in the revised plan." We appreciate the opportunity to provide guidance, direction and comments and respectfully ask that they be taken into consideration. NMFLB will continue to be involved in this process and support the rights and lifestyles of our members.

Respectfully submitted,

Chad Smith

CEO NMF&LB