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Title:
Comments: From: Susan Ostlie
To: Kohrman, Elaine B -FS; Browne, Sarah - FS
Subject: Comments for Cibola NF premlinary draft mgmt plan
Date: Wednesday, August 31, 2016 5:01:12 PM
Hello Elaine, The link you listed on the comment sheet for this phase of the plan revision process doesn't seem to work, so I will just send you my comments directly. Sorry to not follow protocol, but my browser thinks the link listed on the comment sheet is a phishing site.
Here are my comments;
Comments for Cibola NF Plan Revision -
Preliminary Draft Plan, Wilderness Process Paper, and Wild and Scenic River Eligibility Process
from Susan Ostlie Rio Grande Valley Broadband of the Great Old Broads for Wilderness
1. Wild and Scenic River Eligibility Process - Page 3 - lines 32-38 and page 4 lines 1-2. Step 3 - Identifying region of comparison for ORVs (Outstanding Remarkable Values). Using the entire state of New Mexico as the region of comparison is not a sensible region of comparison. The northern half of the state has a much larger area (like the Sangre de Christo Mountains, the San Juans, etc.) that feeds into each of the rivers, (like the Pecos, the Rio Grande, the Chama, the Canadian, etc.) than the sky island mountain ranges of the central and southern half of the state. A more appropriate region of comparison for the much smaller rivers and streams would be the other sky island areas of New Mexico. If this more appropriate region of comparison were used, instead of only seven Wild and Scenic River designations out of 435 rivers and the 88 (?) evaluated by the Interdisciplinary Team using a rapid assessment tool, there would likely be additional rivers that could be added as eligible. Also, the Draft Plan should include a clearer explanation of how "evaluating any remaining rivers that do not have records would present skewed results." Page 3 - lines 10 and 11. I would think that not analyzing the "remaining rivers" - (of the 435? or of the 88?) would skew the results. I read the entire eligibility paper twice to find out exactly how many of the 435 (or 88?) rivers were analyzed by the rapid assessment IT, but could find no figures or understandable information that revealed this number. Clarification of this section would be very useful. I also looked for the analysis of the other 81(?) areas that were assessed by the IT in other Forest Service plan revision preliminary draft documents, but could not find this information anywhere else.
2. Proposed Management Areas and Draft Alternatives - Mt. Taylor RD - Guadalupe and Salado Canyon Areas. - While I am glad to see that the preferred alternative calls for Special Management for the Salado Canyon/Guadalupe polygons, the two areas should also be included as recommended wilderness for the Preferred Alternative (B), rather than just in the Backcountry alternative (E). Because they are adjacent to BLM WSA's, the strongest protection (wilderness) for all of these areas should be the preferred alternative. This is a very difficult area to prevent illegal incursions onto, and managing it as wilderness would add strength to the Forest Service's ability to

enforce the strongest protections. This is also prime wildlife and plant habitat and has many opportunities for solitude and a primitive experience.
3. Wild and Scenic River Eligibility Process - Agua Remora, Water Canyon, Rinconada Canyon, Little Water Canyon, West Red Canyon, Tajique Canyon, and Los Huertas Creek. I am pleased to see that the protection of all seven of the rivers receiving the Wild and Scenic designation will be protected in all alternatives. I just wonder if there are not more that could have been identified for protection if the Region of Comparison had been the sky island areas of central and southern New Mexico, instead of the whole state. There could have been more areas of scenic value if this had been the Region of Comparison.
4. Proposed Management Areas and Draft Alternatives - Mt. Taylor RD - Little Water Canyon - I was glad to see that Little Water Canyon in the Zuni Mountains has protection as a Special Management area - under the Wild and Scenic River Eligibility Process, but additional protections for the area for its unique botanical characteristics should be added to the management plan.
5. Proposed Management Areas and Draft Alternatives - Magdalena RD - (San Mateo Mountains - "Panther Canyon") - Polygon D3_5K16 - I strongly object to this polygon and others like it in the Magdalena Ranger District being dropped from the lands considered suitable for recommended wilderness. This polygon is certainly large enough to provide for primitive and unconfined experiences, and provides excellent opportunities for solitude. The roads nearby are very lightly traveled, and most of the area is sheltered from the sights and sounds of what little travel there is by the ridges and canyons found on the polygon. The private inholding in the south appears to no longer be used, and the one fenced run I have seen are located in an area with many trees, and are not substantially noticeable.The remnants of the two-tracks are substantially overgrown, especially in the northern part of the polygon in the Panther Canyon area. There are smaller trees growing in the middle of the two tracks, so it is basically reduced to a path. Allowable grazing improvements and wildlife guzzlers should not eliminate such a large polygon (27,598 acres) from consideration as wilderness. and eliminating the polygon because of undocumented mountain bike use on the periphery of the area is also not a reason to determine that the area is not able to be managed as wilderness. These issues with grazing improvements and manageability appear to have been applied to other polygons in the Magdalenas that have been dropped out of consideration for wiLderness. I would ask that the Landscape teams and the Steering Committee reconsider these decisions.
6. Proposed Management Areas and Draft Alternatives - Magdalena RD - Magdalena Mountains - Ryan Hill - I would like to address the issue that the small Ryan Hill polygon in the Magdalenas has extraordinary scenic value, not only because of the outstanding vistas available, but also because it contains the largest Arizona Alder in the whole country. The mining remnants could be considered historical, but there should be some kind of special management or protection of that area because of the Arizona Alder. If this can't be protected as wilderness because of the Langmuir Research and Magdalena Observatory agreements, it should certainly have some other kind of protection. If it contains the largest Arizona Alder, that argues for protection or special management as an old growth biological or botanical area.
7. Proposed Management Areas and Draft Alternatives or Preliminary Draft Land and Resources Management Plan - Sandia RD -The East Mountains

Outdoor Education/Recreation Center - page 181 (older draft). I strongly support this management area. This proposal should be in all of the alternatives, and could also be used to educate people about the adjacent Sandia Wilderness area, what is and isn't allowed in wilderness and the reasons why that is true, so that there would be less confusion about the change in management of the Sandia Ranger District.

8. Mountain bikes in Wilderness - Again, there are many who would argue that mountain bikes should be allowed in wilderness, but this violates the spirit of the Wilderness Act. In a study in the Gallatin IRA in Montana, researchers found that horses have the least effect on the amount of space wildlife needs for foraging and reproduction along a trail, followed by hikers. However, mountain bikes were far more disruptive and drove wildlife much farther from trails because they are usually very quiet, which startles wildlife, and move much faster than hikers or horsemen, so therefore cover much larger areas and affect many more animals. Recently, many mountain bikers are moving toward extreme mountain biking, where they race against each other to bag the fastest time to the top of a peak and back down. This is highly disruptive to hikers, horsemen, and wildlife, and has absolutely nothing to do with one of the purposes of wilderness, which is to provide a primitive and solitary experience.

9. Lower elevation wilderness areas should be expanded to ensure safer wildlife corridors, etc. Many wilderness areas that have been adopted in the past are at the highest elevations, which does not provide the best habitat for species that need wildlife corridors for migration, and does not allow for adaptability in light of climate change. Several polygons that were dropped off in the third inventory like D3_5K16 (labeled as Panther Canyon in the Citizen's Wilderness Proposal) is an excellent example of a lower elevation area that is remote enough to provide lower elevation habitat for the wildlife that cannot remain at the highest elevations in the winter like to nearby Withington and Apache Kid wildernesses and the ridge tops in-between these two areas in the San Mateo mountains. This is also true of many polygons that were eliminated in the Datils and the Bear Mountains north of the San Mateos and the Magdalena mountains.

10. Preliminary Draft Land and Resources Management Plan - Grazing improvements in wilderness - Pages 80 to 84 (on the older copy of the preliminary draft management plan) - It would seem that there are several polygons - including D3_5K16 - that were cut back or dropped off the Stage 3 Inventory because, among other issues, grazing improvements and/or wildlife guzzlers were deemed substantially noticeable. Since the Wilderness Act necessarily allows grazing in wilderness, along with necessary fencing and water accommodations, these improvements should be minimized as much as is feasible over time by moving fences to less visible areas, or painting out the most obvious fenceposts and watering tanks, pipelines, etc. It is not just an issue of the primitive experience for humans that matters; it also matters that wildlife including plants and animals should have enough habitat to have their foraging and reproductive areas protected from overgrazing and the destruction of essential riparian habitats. When I read the grazing desired conditions, standards and guidelines, I was pleased to see that the plan's language is written in such a way as to allow sensible management of grazing. The only area I would take issue with is on page 82 - line 2 - "may need to be adjusted" should read "shall or must be adjusted." It is very difficult for range managers to avoid giving in to pressures from the grazing and livestock industry to ignore

degraded habitats, and continue inappropriate and badly managed grazing operations on public lands. Ranchers want to be good stewards of the land, but have less invested in public lands than in their own private land, and that can compromise the best of intentions. I also want to support the plan on eliminating grazing of domestic sheep and goats (lines 42-43) in areas of current and potential bighorn sheep habitat. There are many studies that support the transmission of diseases like scabies to bighorn sheep from domestic sheep and goats. Additionally, on line 24 on page 83, it should be phrased, "Forest managers 'shall' work continually"…(helping verb left out?) Finally, on page 83 - lines 9-11discussing range facilities and scenic integrity, how would fence lines accommodate horses as well as hikers on trails? The maze style walk-throughs wouldn't work for horses like they do for hikers. Would gates need to be installed? They would seem to be less disruptive than some other options, especially if they are wood and wire. At any rate, this section of the plan seems to allow range managers to take more than economics into consideration in their decisions; it mandates the use of best available science, and I approve of that.
11. Management plan language is unclear - Inventory and Evaluation of Lands Suitable for Inclusion in the National Wilderness Preservation System -
Page 60, lines 26-29. I would like to ask for clarification of this paragraph's language. It seems to be an important part of how decisions were made for wilderness inclusion or exclusion, but it is really not understandable to a layperson like me. I don't really know how to suggest alternative language for this paragraph, because I don't understand it well enough to do so. It would be useful to see how this paragraph was applied to the evaluations of various polygons.
12. Adding an Alternative F or modifying the Backcountry alternative E. Inventory and Evaluation of Lands Suitable for Inclusion in the National Wilderness Preservation System. I completely support the Citizens Coalition comments from 8/31/2016 that the range of alternatives in the preliminary draft does not include an adequate amount of wilderness in the backcountry alternative (E). To only include 29% of the well-documented citizen's proposal - 94,000 acres versus the proposed 288,000 acres, does not represent a fair spectrum of choices for the public to comment upon. The Citizens' Coalition proposal should be added as a 6th alternative (F), or the Backcountry alternative (E) should be greatly expanded to include the 288,000 acres. This still leaves most areas of the forest to be managed as regular public lands, where motorized and mechanized uses are allowed if appropriate. Given the stresses of climate change and drought, and the financial pressures of trying to manage the public lands with today's reduced resources, preserving as much wild country as possible for future generations to be able to make decisions about protecting is a sensible strategy. If we can't get this job done in our generation, let's leave a legacy for our descendants to make wise decisions about the management of public lands. Once the lands are out from under wilderness protections, they will never be able to be put back under those protections, and the world will not doubt need wild places even more in the future.
Thanks for your time and attention in this matter, and have a good Labor Day weekend...Susan Ostlie