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Comments: Elaine Kohrman, Forest Supervisor

Cibola National Forest

2113 Osuna Rd. NE

Albuquerque, NM 87113

August 31st, 2016

RE: Preliminary Draft Land and Resource Management Plan, Cibola National Forest Mountain Ranger Districts Plan Revision.

Dear Ms. Khorman,

The Forest Stewards Guild has a long-standing relationship with the Cibola National Forest. We have collaborated on several forest restoration projects, particularly in the Zuni Mountains, and look forward to working with the Cibola NF for years to come.

The Cibola NF continues to do excellent work to promote forest health and economic opportunities for forest dependent communities in New Mexico. Recently, Guild staff members were particularly impressed with how the Cibola NF successfully managed the North Fire for resource benefit both in and out of designated wilderness. Allowing wildfire to retain its natural role in fire dependent ecosystems is a significant step in the right direction towards more resilient forests.

After reviewing the Cibola National Forest Mountain Ranger Districts Plan Revision, Preliminary Draft Land and Resource Management Plan we would like to make the following recommendations:

1. Resilience has emerged in recent years as a guiding principle for natural resource management. The draft plan includes resilience as a desired condition for several resources yet does not provide a definition of the term in the glossary section. There are many working definitions of resilience. One prominent definition used by the Resilience Alliance defines resilience as "the capacity of a social-ecological system to absorb perturbations and other stressors such that the system remains within the same regime, essentially maintaining its structure and functions. It describes the degree to which the system is capable of selforganization, learning and adaptation (Holling 1973, Gunderson & Holling 2002, Walker et al. 2004). Including this definition in the Forest plan, and adapting it where necessary to fit within the context of the Cibola National Forest Plan, would help forest managers implement this important guiding principle.

2. The concept of fire adapted communities has gained acceptance in recent years and is a foundational concept of the collaboratively developed National Cohesive Wildland Strategy (FACLN 2016).

? The Fire and Fuels section in chapter 2 of the preliminary plan would be strengthened in the management approaches section (page 79, lines 11-26) by being anchored in the language of the National Cohesive Wildland Strategy and the concept and practice of pursuing fire adapted communities.

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? The section on page 79 (lines 16-21) would be strengthened by also acknowledging that in addition to prioritizing areas for fuels treatments, Community Wildfire Protection Plans also prioritize other important mitigation efforts (i.e. wildfire preparedness, evacuation planning, codes and ordinances, roof replacement programs, improved ingress-egress routes, etc.) that will benefit effective wildfire response and may increase firefighter safety. These recommendations may support the Cibola National Forest in developing a forest-wide NEPA decision to proactively manage fuels around priority areas identified in Community Wildfire Protection Plans.

? The preliminary draft plan would also benefit from the recognition that there is a high

likelihood of large high-intensity wildfires impacting the forest districts in the future.

The reality is that the agency will be managing these areas for decades and that the plan could be improved with the addition of desired conditions and management approaches for areas of moderate to high-intensity wildfire where that fire is outside the historic range of variability for that ecosystem type. A discussion of post-fire flood events, the concept of resiliency, and the role of climate change could also be part of this addition.

3. As written, the desired conditions for the Fire and Fuels section aims to have wildland fire play its natural ecosystem role (page 79, lines 8-15) in and outside of designated wilderness areas. We think this is a very important component of the plan. The guideline on page 79 (lines 29-30) could be broadened to encourage minimum suppression tactics in and outside of designated wilderness areas to preserve natural landscape character across the Forest where it doesn't compromise firefighter and public safety.

Thank you for the opportunity to engage in the development of the plan that will guide the management of our beautiful and important public lands.

Sincerely,

Matt Piccarello

Community Forestry Coordinator

Eytan Krasilovsky

Southwest Director

References:

Gunderson, L. H. and C. S. Holling, eds. 2002. *Panarchy: Understanding Transformations in Systems of Humans and Nature*. Island Press, Washington DC.

Holling, C. S. 1973. Resilience and stability of ecological systems. *Annu Rev Ecol Syst* 4:1-23.

Walker, B., C. S. Holling, S. R. Carpenter, and A. Kinzig. 2004. Adaptability and Transformability in Social-Ecological Systems. *Ecology and Society* 9:5.

Fire Adapted Community Learning Network (FACLN). 2016. Frequently Asked Questions.

Accessed at, <http://fireadaptednetwork.org/about/frequently-asked-questions/>.