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Comments: August 31, 2016
Ms. Elaine Kohrman
Forest Supervisor
Cibola National Forest
2113 Osuna Road NE
Albuquerque, New Mexico 87113

Dear Elaine:
Please accept this letter of comment from The Nature Conservancy for the Cibola National Forest Mountain
Ranger Districts Plan Revision Preliminary Draft Land and Resource Management.

The Nature Conservancy appreciates the opportunity to comment on the Preliminary Draft Land and Resource
Management Plan, and the effort that the Cibola National Forest leaderships has made to include partners,
collaborators, and interested citizens in the development and refinement of this draft plan.

The Nature Conservancy and Rio Grande Water Fund are important partners with the Cibola National Forest to
restore forest and watershed resiliency in the region to benefit many users. As such, we have narrowed our
comments to focus on watershed health, vegetation communities, and fire management topics. We hope that you
find these comments helpful as the Plan language is refined.

Comments for Chapter 1:
Page 7, Line 23 - Fire risk and fire hazard have specific definitions frequently used in the fire management
community. However, on page 7, the use of the term "fire risk" is incorrect given the context. There are other
instances in the document where the term "risk" is used that should be reviewed for consistency (pg10, line 15;
pg 19, line 38; pg 52, line 30; and pg 77, line 9). We recommend using the terms fire risk and fire hazard only
after they have been defined, and suggest using the term "threat" where fire risk or fire hazard isn't appropriate.
Colin Hardy from the Missoula Fire Lab provides excellent definitions of these terms in his 2005 paper that
appeared in Forest Ecology and Management v211 pgs.73-82.

Page 11, Line 32-34 - The first sentence in the Ecological integrity paragraph is unclear. Consider revising.

Comments for Chapter 2:
We applaud the inclusion of natural disturbance patterns such as fire regime, climate change, and insects and
disease in the Plan Elements Common to All Vegetation Types (pg 21-22). The thoughtful discussion of the
importance and natural occurrence of insects and disease is appreciated. The fire regime section would benefit
from this type of discussion to provide the background necessary for the general public to understand the role fire
regimes play in plan implementation. We also recommend to include one example vegetation community for
each regime type in Table 1.

Page 23, Lines 5-6 - PNVT is a static concept as it is tied to the soil type in a particular location. This concept is
tied to the Management Approach (lines 11-15). If management activities promote only those
vegetation communities identified by soil type and PNVT for that location, how will species composition be
allowed to shift in the face of climate change? This will restrict the Cibola's ability to respond to the natural shift or
movement of species we are likely to see over the life of this land management plan. Please consider a revision
that allows for climate induced shifts.

Page 25, Line 20 - Does this guideline for timber management preclude restoration activities in areas designated as wilderness? Clarify or consider revising to allow for restoration activities that promote wilderness characteristics for areas recommended for wilderness designation.

Page 37, Line 27 - Group torching is not mentioned in the Mid-Scale Desired Conditions or the Fine-Scale Desired Conditions for Ponderosa Pine vegetation community. Please consider including a desired condition that includes fine-scale torching to promote the heterogeneity of structure and habitat features important to wildlife.

Page 52, Line 30 - Desired Condition for Watersheds is unclear, specifically what they are at risk to. Given the reference to fuels and uncharacteristic disturbance, one could assume fire, but it is unclear. Please consider rephrasing similar to line 38.

Page 77, Line 9-10 - This statement is listed as a desired condition, but appears to be a management approach. Consider moving he existing state to management approach and adding the following statement to Desired Conditions in its place: The frequency and area of high-severity wildfire effects have been reduced due to restoration activities.

Page 77, Line 27 - It is unclear which species are critical in this context.

Page 77, Line 29 - This fire and fuels guideline for wilderness, "Minimum impact suppression tactics should be utilized in wilderness areas to help preserve its natural character," is fine, and should be improved by adding "and to allow natural ecological processes" which is consistent with the Forest Service Manual 2320, 2323.51 Objective

Page 78, Line 1 - This fire and fuels guideline for wilderness, "Fire operations within wilderness areas should not compromise wilderness characteristics" is fine, and should be enhanced by adding "that fire operations within wilderness areas should allow natural ecological processes and be used to maintain wilderness characteristics."

Page 77, Line 22; Page 78, Line 22 - There are no guidelines or management approaches that address post-fire management activities to promote recovery that is integrated across the watershed and consistent with community values and needs. Our suggestion is that key concepts such as use of native seed sources, weed-free hay for mulch, and contour felling or other erosion control techniques should be considered in the Plan, because experience has shown that BAER activities begin immediately without discussion and that BAER practices can have irreversible consequences that work against the goals of the Forest Plan.

Thank you again for the opportunity to provide comments on the Draft Land Management Plan. Please do not hesitate to contact me or Sarah Hurteau, Albuquerque Urban Conservation Program Director, with any questions about these comments.

Sincerely,
Laura McCarthy
Director of Conservation Programs