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Title:

Comments: Cibola National Forest Mountain Ranger Districts

Comments

Preliminary Draft Plan, Wilderness Process Paper and all maps

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Document Reviewed:Cibola NF Mtn. RD Plan Revision Prelim Draft  
Land and Resources Management Plan

Resource Section:Appendix D: Proposed Management Areas and  
Draft Alternatives

Page # 172-174Line # all

Comment: None of the alternatives adequately protect the 288,250 acres of Cibola NF identified as having wilderness character in the citizens proposal put forward by the Wilderness Society and fourteen co-signing organizations.

Recommendation: Add an "Alternative F Conservation Emphasis" with the following Recommended Wilderness  
Approximate Acreage:

Mt. Taylor: 19,300 acres (Greater Guadalupe Canyon Area)

Magdalena: 269,000 acres (including Scott Mesa-Bear Mountains 48,300 acres; Magdalena Mountains 49,300 acres; San Mateo Mountains including Panther Canyon 110,400 acres)

Mountainair: 4,200 acres

Sandia: 900 acres

Alternative F would include Updated Eligible Wild & Scenic Rivers

Alternative F would include Proposed Management Areas:

Mt. Taylor: Mt. Taylor Watershed, Little Water Canyon

Mountainair: Fourth of July, Gallinas Municipal Watershed, Jumanos Pueblos, Cement Springs, Bighorn Sheep, Gross Kelly allotment as seed bank w/o communal grazing.

Sandia: Las Huertas Canyon, East Mountains Outdoor Education/Recreation

Alternative F would use same language as Alternative E for bullet points on p.172 and top half of p. 173.

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Resource Section: Eligible Wild and Scenic Rivers

Page # 136Line # 34-39

Page # 136Line # 1-8

Comment: The heightened level of management protection for the seven rivers listed is desirable and needed. In this land of little water, every stream is precious and needs protection. Can the list of eligible streams be expanded beyond the seven named here? The reality of climate change should heighten concern about protecting water sources.

Document Reviewed: Cibola NF Mtn. RD Plan Revision  
Wild and Scenic River Eligibility Process

Resource Section: Eligibility Steps

Page # 3 Line # 18-19; 33-38

Page # 4Line # 1-2

Comment: The process started with 435 named rivers and streams within the Cibola NF and reduced the list to seven eligible Wild & Scenic Rivers. The Cibola NF chose the entire state of New Mexico as the area of comparison. Given the special nature of the Cibola Mountain Ranger Districts as Sky Islands surrounded by arid desert, a different area of comparison would be more appropriate, excluding the parts of the state whose water sources are fed by the Colorado Plateau. Using the appropriate area of comparison more streams might be found eligible for Wild & Scenic protection.

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Resource Section: Groundwater

Page # 58Line # 26-39

Comment: Need to add a bullet point under Management Approaches to protect groundwater quality by not allowing contamination, dumping or drilling in caves and karst.

Document Reviewed:Cibola NF Mtn. RD Plan Revision Prelim Draft  
Land and Resources Management Plan

Resource Section: Caves

Page # 105Line # 21-30

Comment: Need to add another bullet under Management Approaches to protect caves by not allowing drilling operations near caves and karst.

Cibola National Forest Mountain Ranger Districts

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Inventory and Evaluation of Lands that may be Suitable for Inclusion in the National Wilderness Preservation System

Resource Section: Appendix B: Detailed Inventory Results

Comment: I believe that the evaluation criteria in the Wilderness Act and the directives in the Forest Service Handbook have been misapplied in the evaluation of Cibola NF land suitable for inclusion in the National Wilderness Preservation System. The carefully researched citizen's proposal put forward by the Wilderness Society and fourteen co-signing organizations identified 288,250 acres with wilderness character, in polygons meeting the criteria, out of the 410,310 acres identified in the Cibola Phase 3 Final Wilderness Inventory. The Forest Services' most liberal alternative, Alternative E, only recommends 94,323 acres for wilderness protection. This is inadequate, and misapplication of the criteria for "apparent naturalness" and "opportunities for solitude or primitive and unconfined recreation." In particular, the process paper does not explain how the findings on the listed criteria are weighted to come up with a Yes/No finding.

As a specific example, my comments on Panther Canyon, Polygon D3\_5K16 follow:

Document Reviewed: Cibola NF Mtn. RD Plan Revision Prelim Draft

Wilderness Character Evaluation Criteria Matrix

Resource Section: Magdalena RD: NW San Mateos Mountain Area

D3\_5K16 Panther Canyon

Page # 236-247

Comment: I am focusing on the Panther Canyon area because I have hiked in this area, entering from Hughes Mills. I rate the area high on apparent naturalness; high on opportunities for solitude AND primitive unconfined recreation; and moderate on can be managed to preserve its wilderness characteristics.

Continued next page

Cibola National Forest Mountain Ranger Districts

Comments: Preliminary Draft Plan, Wilderness Process Paper and all maps

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Continuation of comments on Wilderness Character Evaluation Criteria Matrix

Resource Section: Magdalena RD: NW San Mateos D3\_5K16 Panther Canyon pp.236-247

Specifically, in regard to Apparent Naturalness, I've heard first hand accounts of encounters with bear and panther. The Forest Service reports multiple Mexican Spotted Owl protected activity centers in the area (p.241) and the USFWS includes some of the are in Mexican Wolf occupied range (p.243). This polygon is an important wildlife corridor between the arid plains and the protected high country in the Apache Kid and Withington Wildernesses. As climate change progresses these corridors become increasingly important for preservation of local wildlife populations.

Vegetation in the area also scores high on apparent naturalness. I've seen huge old-growth pines at the top of

Panther Canyon. There are some areas with weathered stumps from old logging operations, but natural processes are breaking them down and young trees are filling in around them. As for human "improvements", I did come across traces of old roads that have been reduced to single-track foot paths by encroaching vegetation. I haven't seen the reported wildlife drinkers or noticeable fencing (p. 238). Apparent Naturalness is high. My experience in the Panther Canyon area was of solitude and unconfined recreation. The fact that the polygon abuts the Withington Wilderness expands the sense of spaciousness. I haven't visited during hunting season, but the presence of hunters seems to me to be evidence of primitive and unconfined recreation. NM Backcountry Hunters and Anglers and NM Sportmen support the citizens proposal for wilderness designation for this polygon. The potential mountain bike loop can be rerouted so as not to impinge on the area (page 240). I don't believe that the existing fences "impact a visitor's ability to recreate unconfined" or "restrict access in some places" (p. 240). Opportunities for solitude and primitive unconfined recreation are high in this area. I believe that the area can be managed to preserve its wilderness characteristics. Grazing allotments overlapping boundaries can be grandfathered in. I have attended hearings at which FS personnel have reassured ranchers that limited motorized access can be sanctioned for maintaining specific improvements within wilderness. (p. 243). I think that the long term goal should be to phase out grazing on most public land, but that is not the issue under discussion here.

Continued next page

Cibola National Forest Mountain Ranger Districts

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Continuation of comments on Wilderness Character Evaluation Criteria Matrix

Resource Section: Magdalena RD: NW San Mateos D3\_5K16 Panther Canyon pp.236-247

There seems to be different opinions about how much use the inholdings and cherry-stemmed roads get. Data would be needed to make a case that the use level is high enough to jeopardize management of the area (p. 244). Documentation of the frequency of aircraft flyovers would also be needed to qualify this factor as a management problem. The next sentence states that "Hunting and horseback riding occurs in the area" so apparently the planes aren't scaring the game or the horses (p. 244). Ability to manage the area to preserve its wilderness characteristics should be rated as moderate or better.

The statement on page 245 that "The team finds that 5K19 does not have wilderness character" seems unfounded, and it contains a typo. I think we are talking about 5K16 not 5K19.

The table on page 246 rates the area on the three required characteristics as #1a and 1b High, #2a, 2b and 2c Moderate, and #5a Low. There is no explanation in the process paper as to why this score would lead to the Evaluation Finding of "No."

I rate the required characteristics of naturalness, solitude/primitive recreation and manageability as #1a and 1b High, #2a, 2b and 2c High and #5a Moderate for Polygon D3\_5K16. I believe that the finding on Wilderness Character should be "yes" for the Panther Canyon area.

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PROOF READING

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Resource Section: Forest Vegetation Types : Mixed Conifer with Aspen

Page # 31Line # 25-26

Comment: This is a typo caused by cut-and-paste from one vegetation type to another. This paragraph should refer to "mixed conifer with aspen", not "the spruce-fir community.'

Document Reviewed:Cibola NF Mtn. RD Plan Revision Prelim Draft  
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Resource Section: Soil

Page # 56Line # 12

Comment: Minor typo. Should read "Piles should contain" not "contained".

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