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Submitted via email to comments-southwestern-Cibola@fs.fed.us

RE: Comments on the Cibola National Forest Draft Management Plan

Dear Cibola National Forest,

I live adjacent to the Forest in the San Mateo Mountains- we share a property boundary in West Red Canyon.

Please accept and consider my comments on the Draft Forest Plan Revision.

#### The Riparian Vegetation type

I am a bird watcher and photographer and it has become abundantly clear that riparian areas are extremely important for birds- residents and migrants. Cottonwoods and willows offer habitat, shelter and food for many, many species. Almost all wildlife depend on the water and proper functioning of the streams that underlie these trees. In the canyons on the West side of the San Mateos, recruitment of young deciduous trees is a problem. The existing trees are old and there are few sprouts to replace them. The understory is so over-utilized in some places that instead of new cottonwoods, new junipers are coming in to take their place.

The word "riparian" appears in the draft plan revision 109 times, but there is no one section devoted to that vegetation type. Instead it is lumped in with the more broad topic of "watershed resources" on page 52 with scattered mentions elsewhere. I was confused by this. I found myself flipping back and forth within the document and not coming away with a coherent direction or vision about riparian areas. I would like to see a section devoted strictly to the Riparian vegetative type even if it just repeats what is scattered throughout the rest of the document so it's all in one place to make the plan more understandable when it comes to this crucially important vegetation type.

Moreover, there should also be mandatory standards that apply to Riparian areas with their deciduous trees stating that they shall be protected and not impaired by other Forest uses. The plan itself acknowledges that projected climate changes will unavoidably have challenging impacts for the riparian ecosystem. To me, that means that rigorous protections should not be optional. We must minimize those impacts and insure the greatest possible resiliency.

#### Wildlife

I am a frequent hiker in the Southwest quadrant of the San Mateo mountains. This place occupies a significant part of my heart's core. It is my pleasure to go out with my dogs on these excursions. We travel on and off trail, sometimes on and sometimes away from roads. I see things I wouldn't see without the dogs with their different eye level, their vision tuned to subtle motion and their keen noses. They are always on leash to keep them from chasing wildlife and from eating unmentionables. But leashes offer no protection from hidden leg-hold traps and snares as I have found to my dismay. I had a very close call with a trap in Baney Canyon. The trap odor lure drew not only the dogs but also me since they were leashed directly to the trap. We were only saved by my serendipitously kicking the trap which was hidden under leaves which caused it to slam shut empty. It could easily have caught one of the dogs- and I discovered I could not have opened it alone. I could not have removed it to carry a dog to help. And I probably couldn't have carried a 60 pound dog back the hour and a half I'd walked from my truck anyway. I would not have left a dog alone in a trap like that. So we almost became the subjects of a search and rescue operation had I not returned home when I was supposed to. I shudder to think of the injury a dog would endure from that. Since then, there have been times when I have known a trapper to be in the area

and have felt that I could not safely recreate on the Forest. Because there is no way to know where traps are set nor how many there are, my ability to recreate in the forest during the 4.5 month trapping season has been compromised.

I am perplexed that the Forest does not require warnings when traps are hidden thereon. Private trappers should be required, like Wildlife Services is, to post warning signs not only at general entrances but also at specific trap locations. NM Game and Fish does not even know where traps are set nor how many are out there.

Moreover, because trapping is a commercial activity- one which, unlike hunting of other species, is done for the express purpose of selling the trapped animals' pelts- the Forest should require a recreation special use permit apart and in addition to the licensing by NM Game and Fish, much like is done for outfitters and guides who use the forest for their business with paying hunting clients. This permit should require signage and afterwards trappers should report not only what target animals were captured and how many (which they are already required to do for NMG&F) but also any non-target captures including domestic animals and their fates. This is the public's wildlife on the public's land. It is not unreasonable for the Forest managers to have this information so it can be considered for project planning purposes. Under "Recreation" on page 107 line 5, it states that a desired condition is, "User conflicts are minimized." As it stands today, the Forest is making no effort at all toward minimizing conflict between trapping and other Forest Recreation.

#### Wild and Scenic River Designation for West Red Canyon

Concerning the proposal to designate West Red Canyon from the Forest Boundary (our shared boundary fence) up to Red John Box as a recreational Wild and Scenic River because of the archeological/cultural values, I have questions about the maintenance of the road, Forest Road 478, that runs in this canyon and which I and others use to access the forest. This road has not been maintained since 2009 and previous to that, 17 years went by without maintenance. Since a Recreational Wild and Scenic River may have development including roads along it, allow me to suggest that in order to better protect the cultural values of this designation if it is approved, a commitment be made to more regularly maintain this road. This will better control erosion and prevent drive-arounds that could impact archeological sites which are also along the road. I'm not a fan of an excess number of roads, but this one is a major access point to the SW side of the mountain and does not seem excessive.

Generally, there is no water in West Red Canyon in the segment proposed for Wild and Scenic River designation- so it would be more a Wild and Scenic arroyo most of the time. Plus I also have concerns about bringing the presence of the ruins to the attention of the public. Right now most people are unaware of the room block sites that are quite accessible and this has some protective value. There is no looting occurring at present. Could the designation have the opposite effect of protection for these sites?

#### Wilderness

I am perplexed that the Panther Canyon polygon, D3\_5K16 roughly between Forest Road 549 in Bear Trap Canyon and Forest Road 96 along the crest of the San Mateos which was considered for wilderness inclusion has been dropped from consideration. Among the evaluation criteria, I disagree with these findings of the Wilderness Character Evaluation Matrix for this polygon:

Question 1c: What is the extent to which improvements included in the area represent a departure from apparent naturalness? The Forest assigned a "Moderate" finding for this question. There are some very old road beds in the polygon but they are not being used for motorized traffic and are successfully being reclaimed by nature. The matrix indicates that there are two guzzlers but despite having hiked over many parts of the polygon, I don't even know to what is being referred or where they are. The guzzlers have not been substantially noticed by me.

There are fences for the purpose of managing livestock. But livestock grazing should not be a consideration when it comes to designating Wilderness. Grazing that is occurring prior to Wilderness designation is allowed to continue afterwards. Thus, the accoutrements that go along with livestock grazing like fences, pipelines, guzzlers and even future EQIP projects should fall in the same category of non-consideration. Fences and pipelines are not restrictive to travel on foot.

Moreover, when areas as small as 5000 acres can be eligible for Wilderness designation, I think it goes without

saying that the modern world will be visible from some parts of it. If those 5000 acres were in a perfect circle, the furthest a person could get from the boundary would only be a couple of miles. Clearly congress recognized that even this small distance could be worthy of Wilderness protection. There is no requirement for a buffer area between Wilderness and non-Wilderness to stop visual and even auditory intrusions from the latter to the former. The existing Withington and Apache Kid Wilderness areas have views of I-25 the major north-south interstate highway that runs the length of central New Mexico and that did not stop their designation. The topography of the Panther Canyon polygon is so twisted, steep and curled that even over the small distance to the boundary, one doesn't have to go far to feel well away from the evidence of modern human existence.

For these reasons, I would answer question 1c with a "Low" finding of departure from apparent naturalness. (meaning that on this question the Panther canyon polygon should fall under the most eligible category for Wilderness designation.)

Question 2a: I disagree with the finding that there is only a "moderate" opportunity for solitude in this area. In my 25 years of hiking within it, I have never met another human while I was on foot away from the road. To even see someone on the road is unusual and rare. I would assign a "high" finding for solitude and cannot imagine what it would take for a place to get a 'high' finding if this place doesn't get it.

For the assertion in Question 2b that mountain biking is occurring on Forest roads 73, 219 and 95. I see from the map, that it could continue to occur as these roads even if the Panther Canyon polygon became a Wilderness as the roads are not included in the Wilderness designation. I don't see the potential for a loop involving these roads as described in the matrix. The Mouth of Bear Ranch is a private inholding that is in the way of such a route and at the lower end, the road is blocked with a locked cable across it. With or without a loop, the presence of mountain bikes on these roads, because bikes are quiet, would not impinge on my enjoyment of the Panther Canyon area away from the roads. Again, if this polygon cannot get a 'high' finding for the opportunity to engage in primitive recreation, I don't know what area could.

Question 4e: I disagree with the finding that there are no high quality water features within the area. The Matrix describes the spring where Bear Canyon comes into Chimney canyon as being intermittent. I have never seen it dry and often it creates a running stream. So much so that there are Alder trees in the canyon below it- which I see nowhere else on the SW side of the mountain range. This might not be high quality water in some places where water is generally more abundant, but in the San Mateos which are so dry, is it unusual and special.

In addition, there is a very beautiful (and unusual for the area) iris bog at the upper end of Spring Hollow canyon that is not mentioned in the matrix.

For these reasons, I would assign a "moderate" finding when it comes to quality water features in the area.

In the overall evaluation of why this area was excluded, the public does not have a way to see how the determination was reached even with the findings such as they are. Does an area have to have 100% score on all the findings to be considered? The decision has the appearance of being arbitrary.

Overall, I appreciate the Forest Service effort to examine the area's attributes and attempt to qualify them for wilderness inclusion but at the end of the day it is important to ground truth those qualities and the resulting evaluation outcome. As a wanderer in the Panther Canyon polygon, the existing Apache Kid Wilderness and the newly recommended for Wilderness additions D3\_ADJ8 and d3\_ADJa.c, I don't see much in the way of difference in the field that would justify a different land status and designation for only one of those four.

Sincerely,  
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