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Comments: Draft Plan Comments - Coalition to Keep Cibola National Forest Multi-Use

Please find attached the comments from the members of the Coalition.

Cibola National Forest Mountain Ranger Districts

Comment Form for use with

Preliminary Draft Plan, Wilderness Process Paper, and all maps

Document

Reviewed (draft

plan, wilderness

process paper,

map)

Resource

Section Page # Line # Comment

All comments

within this

document are in

reference to the

preliminary draft

plan

(fseprd510428.pdf)

Pinyon-Juniper

evergreen shrub

woodland

41 2-20

Pinyon-Juniper over population negatively affects watershed and overall ecosystem health. Language should be added to allow for management of these species at a healthy level. Native forage production for wildlife and livestock, and watershed health should be prioritized.

Groundwater 57 9-12

17-20

Well locations are determined by water right assignment and are outside the authority of the USFS. Present and future water right decisions should be left to the authority of the state engineer.

Water resources

wetland/riparian 62 6

The line "Utilize groundwater wells to replace surface water sources to prepare for drought and climate change conditions" should be deleted.

Water right administration falls under the authority of the State Engineer. This is an inappropriate and wasteful use of a scarce resource, especially during this time of drought.

Water resources

wetland/riparian 62 13

If grazing is to be restricted in these areas, suitable watering alternatives must be made available. This should be done before any restrictive action is taken. Development or 'cleaning' of existing springs and improvement of current water impoundments should be considered before restrictive actions are taken place. Poor management of these existing resources is no excuse for further restrictions to legitimate use.

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Water resources

wetland/riparian 63 37

Budgetary constraints and inefficiencies prevent USFS from properly managing their current holdings. It is not appropriate to acquire more lands in the interest of protecting the resource if these lands can't be effectively and productively managed. This line should be deleted or other solutions should be found

Land ownership

adjustment and

boundary...

93 21 Add language to specifically allow for acquisition when required for access and right of way. As stated previously, USFS is too constrained to effectively manage existing holdings. This should only be done when required to allow for improved access to existing USFS lands.

Eligible wild and

scenic rivers

135 27 As stated in the plan, there are currently no designated Wild and Scenic Rivers on the Cibola. As such, there is no need for this preemptive management strategy.

It is important to note that water related multi-use opportunities (prospecting, boating, biking/ hiking near water) are already very limited on the Cibola because of the scarcity of water. By assigning this preliminary designation, these rare opportunities are further limited.

Water resources

features and

wetland/riparian

59 25 Background levels frequently exceed New Mexico water quality standards. This is an inappropriate and restrictive action that potentially limits development/ rehabilitation of existing water sources. It is not reasonable to think that existing water sources can be remediated below standard maximums, or that USFS would limit use of these sources.

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Referencing New Mexico water quality standards applies arbitrary standards to a natural system for which they were not intended. If the in-situ condition of the body of water does not meet NM Water quality standards, it should be managed based on the historic benchmark levels rather than the more restrictive NM Water quality standards.

Infrastructure 121 25 Table 21 should be revisited upon travel management plan review, as promised by the Forest Supervisor. Comfort level/ road smoothness should be assessed on a meets or exceeds basis. Roads should not be intentionally made less passable to require comply with a ML requirement. Roads should be maintained to the best of the operator and equipment's ability. If one part of a roadway is considered 'more passable', other portions of the same roadway should be maintained to the 'most passable' standard.

National scenic

and historic

trails

137 22 This view shed requirement is restrictive and inappropriate for areas of the Cibola, specifically the upper portions of Mt. Taylor.

A 0.5 mile radius to the trail encompasses a large percentage of the entire mountain at higher elevations because of the conical shape of the mountain. This would limit any future development of additional trails, etc. District Rangers should have case-by-case discretion, as stated in CDNST.

National scenic
and historic
trails

137 36 This foreground requirement is restrictive and inappropriate for areas of the Cibola, specifically the upper portions of Mt. Taylor.

A 0.5 mile radius to the trail encompasses a large percentage of the entire mountain at higher elevations because of the conical shape of the mountain. This would limit any future development of additional trails, etc. District Rangers should have case-by-case discretion, as stated in CDNST.

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National scenic
and historic
trails

137 14 This requirement is restrictive and inappropriate for areas of the Cibola, specifically the upper portions of Mt. Taylor.

A 0.5 mile radius to the trail encompasses a large percentage of the entire mountain at higher elevations because of the conical shape of the mountain. This conflicts with the existing trail and road infrastructure. This line should be deleted. District Rangers should have case-by-case discretion, as stated in CDNST.

National scenic
and historic
trails

138 9 This line should be deleted. These requirements are inappropriate and restrictive. Constraints on lands within 4 miles of either side of the trail are not acceptable.

All lines
referencing
CDNST

Local District Rangers should have case-by-case discretion.

National scenic
and historic
trails

138 19 This biases the regulation toward foot-traffic only events. This is not acceptable in areas like the Mt. Taylor district where there are few developed trails. This line should be deleted.

Bicyclists, equestrians, motorcycles and other multi-use recreationists frequent the CDNST and have alternative routes. Opportunities for this type of recreation are already scarce.

Appendix D 172 Chart The line "retain all management areas" in alternative B implies that there will be no review of the recent Travel Management Plan. The Forest Supervisor has promised a revisit of this plan. This chart should reflect Document

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that.

Appendix D 172 Chart There are no eligible rivers for W&SR in this area. This line should be removed. The W&SR standards must be used, not any other standards

Appendix D 172 Chart The CDNST 1-8 mile restrictions are enforced over too broad an area for the topography of the Mt. Taylor district, as stated previously. Use of emergency vehicles and future economic use are inhibited.

Appendix D 172 Chart There is no alternative that disallows CDNST regulations.

Appendix D 172 Chart The proposed alternatives cover a good range of opinions spanning several levels of restriction. USFS has done a good job of proposing options that were drafted through public input.

Vision and niche
statements

8 22 The vision statement for the Mt. Taylor ranger district is very appropriate to the local area. This vision statement should be maintained as a primary driver for all management decisions.

Vision and niche

statements

8 5 Many of the restrictive management directives in the plan contradict the multi-use concept that is boasted in this statement. This highlights a significant problem with current USFS management philosophy.

At best, this niche statement seems unnecessary and does not add substantive information to the plan. The plan should be made as lean as possible to promote a thorough understanding from the public.

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General

comment: tree

size and

diversity

USFS should aim for diversity in species and size. If only large trees are protected, an eventual size and age gap will exist.

General

comment:

equestrians

The plan makes no specific reference to equestrian use. The word "equestrian" is not mentioned in the plan.

Open comment: There was a promise to revisit the Travel Management plan upon completion of the New Forest Service Plan.

That needs to be priority within this plan.

7/15/2016