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Title:

Comments: Cibola Draft Forest Plan Comments

To Whom It May Concern,

Attached are comments prepared by PNM's Environmental Services Department of the draft forest plan for the Cibola. Thanks for providing the draft for comment and I look forward to working with the USFS on future public comment opportunities for the forest plan Revision. Please let me know if you have any questions regarding this submittal.

Thanks,

David Reynolds

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<<http://www.pnmresources.com/index.cfm>>

Preliminary draft plan; received 8/9/2016

Watershed Resources/Soil, pages55, line 2

This guideline likely only applies to projects of a certain size. Small special use projects often will need to compact all or very high percentage of the work area. Please clarify the intent of the guideline.

Preliminary draft plan

Watershed Resources/Soil, page 55, line35

This guideline is unclear. Please clarify if "selected areas" refers to documented areas or an unspecified percentage of a project area. If possible identify optimal patch configuration desired.

Preliminary draft plan

Watershed Resources/Features and Wetland/Riparian, page 60, line 1

This standard should be reworded. Linear facilities frequently need to cross flood plains. Minimizing the distances within the flood plains may not advance the policy of reducing flood damage. Special use projects should be evaluated on a case by case basis. Replacing "facilities" with "buildings and recreation sites" could help to clarify. A second standard of minimizing placement of at risk linear facilities could be added.

Preliminary draft plan

Species/Nonnative, Invasive Species, page 71, line 38

PNM applauds this guideline. PNM has an active program of vehicle washing that is in part intended to eliminate the introduction of invasive species.

Preliminary draft plan

Cultural Identity and Cultural Landscapes/Contemporary Users, page 90, line 34

Modify the sentence beginning on this line with a sentence that also recognizes the important role of energy corridors on forest lands. "Even in contemporary communities such as the Albuquerque metro area, households supplement their basic needs with forest products and rely on the infrastructure and energy corridors that traverse the forest for heat, electricity and communications."

Preliminary draft plan

Minerals and Geology/Renewable Energy, page 104, line 31

Forest planning rules allow for designation of energy corridors. Designation of certain existing linear facilities as corridors would advance to goal of collaborative resource management. PNM would welcome the opportunity to discuss critical corridors and long term expansion plans.

Preliminary draft plan

Minerals and Geology/Renewable Energy, page 105, line 6

PNM applauds this guideline. PNM has an active program of vehicle washing that is in part intended to eliminate the introduction of invasive species.

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Minerals and Geology/Renewable Energy, page 105, line 11

PNM applauds this guideline. At the same time it is important to recognize that certain types of collocation, such as electric and gas transmission lines, can create significant technical conflicts and safety concerns.

Preliminary draft plan

Minerals and Geology/Renewable Energy, page 105, line 13

Desired vegetative conditions should be adjusted in and near energy corridors to recognize that vegetation transition zones and clearings may provide important ecological services when vegetation is actively managed to provide access and safe clearances from conductors.

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Minerals and Geology/Renewable Energy, page 106, line 4

This management approach is overly limiting and could be deleted. It also appears to group facilities with significant distinctions such as electric distribution lines (12-13kV) and transmission lines (46kV and above). Burying utilities have safety, reliability soil, visual and thermal characteristics that in sum may be more impactful than managing solely for scenic resources. Alternatively the approach could be reworded to read: "New Energy Transmission lines should be designed to remain visually subordinate to the surrounding landscape. Where that is not practicable aesthetic specifications should be implemented such that the structures compliment the desired scenic character."

Preliminary draft plan

Scenic Resources, page 114, lines 31-33

PNM is concerned that guidelines in scenic resources do not appropriately recognize the value of special uses to the forest and the communities they serve. As these lines 31-33 indicate, human alterations are valuable aspects of scenic integrity and if appropriately interpreted add to the sense of place and historic progression. Communication sites such as at Sandia Crest and the necessary power supply to that site are a good example of high value, multiple use of forest land.

Preliminary draft plan

Scenic Resources, page 115, line 33-38

Placing utilities underground can be appropriate in certain instances. Mitigated effects from burying utilities may increase scenic contrast where soil creates highly visible scarring. Undergrounding may also conflict with other desired resource conditions including those in the vegetation, water resources, species, fire and fuels, and cultural resources. Uses affecting multiple resources should be evaluated on a case by case basis. This guideline could be deleted. The guideline at page 115 line 12 is sufficient for the intent here. Alternatively, it is suggested the guideline be reworded to read "New utility lines should be buried in areas with sensitive scenic resources, such as areas along scenic byways, nationally designated trails, and within recreation areas where doing so will not endanger public health and safety or unduly lessen reliability. Existing utility lines that do not meet scenic integrity objectives should be evaluated for opportunities to be reconfigured to reduce scenic impacts whenever opportunities become available (such as when poles are replaced).

Preliminary draft plan

Scenic Resources, page 116, line 1-3

This seems redundant. Having the comment in the renewable energy section is more appropriate.

Preliminary draft plan

Special Uses, page 117, line 34

Change "powerlines" to "electric utility lines" to match language in other sections of this draft.

Preliminary draft plan

Special Uses, page 118, line 10

Change to "Newly constructed features, facilities, and management activities (beyond existing permitted uses) do not dominate the view in high scenic integrity areas and developed recreation areas."

Preliminary draft plan

Special Uses, page 118, line 16

PNM supports a collaborative relationship with the USFS as an existing external special use customer.

Preliminary draft plan

Special Uses, page 118, line 20

This statement is redundant as guidelines detailed throughout the draft plan address agency standards. This guideline could be removed.

Preliminary draft plan

Special Uses, page 119, line 19

The following change to the first sentence of the guideline is proposed, "New facilities added to existing communication sites, astrophysical complexes, utility corridors, and administrative sites should be clustered except where doing so could endanger public health and safety or lessen reliability."

Preliminary draft plan

Special Uses, page 119, lines 35-37

PNM supports this guideline and has implemented an avian protection plan to proactively install avian protection on utility lines and requires the addition of avian protection in the event that a mortality occurs on unprotected equipment.

Preliminary draft plan

Special Uses, page 120, line 20

Construction techniques can be used to minimize impacts to riparian management zones including boring or overhead configurations. Overhead utility lines minimize the impacts to riparian management zones by spanning these areas.

Preliminary draft plan

Management Areas & Designated Areas/Scenic Byways, page 139, line 11-13

It is suggested the guideline be reworded to read "To maintain and protect the scenic quality of scenic byways, management activities, planned and implemented within the foreground (where visible up to 0.5 miles on either side from a vehicle on the byway) should be consistent with the scenic integrity objective of 'high'. Deviations from this guideline for existing uses shall be determined on a case by case basis."

Preliminary draft plan

page 139, lines 21 - 23

It is suggested the guideline be reworded to read "Work closely with New Mexico Department of Transportation,

special use permittees, and county highway departments to manage hazard trees within the immediate foreground (up to 0.5 mile on either side) of scenic byways."