Data Submitted (UTC 11): 10/21/2021 6:00:00 AM
First name: David and
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Organization:
Title:
Comments: Dear Lincoln National Forest Proposal Comments Team,We are writing in reference to the proposed additional acres to be added and designated as wilderness in the proposed Forest Plan. We are writing with the focus on the acres to be added in the Sacramento Ranger District; however, with that said, our comments are appropriate for the other areas as well. Our comments address: 1. The Lincoln National Forest history of catastrophic wildfires in relation to a wilderness designation, 2. Air quality in relation to these fires, 3. Access, 4. The USAF training airspace over the proposed wilderness, 5. The potential for criminal activity, 6. The Lincoln[rsquo]s ability to administer and protect added wilderness areas, 7. New Mexico Department of Game and Fish, particularly area personnel, have not been made aware of this proposed wilderness designation, much less been invited into the conversations regarding wildlife concerns, 8. The presence of numerous nonnative species, and, 9. an increase in human use to the area.1. As you know, a wilderness designation is the most restrictive land-use designation, and this often times results in catastrophic wildfires. Wilderness restrictions can severely hamper the Forest Service[rsquo]s ability to manage forest health and restoration work, including prescribed burns and mechanical treatments. The Wilderness Act does not specifically mention different pre-fire/pre-suppression means in the wilderness areas, and while agency planned prescribed fire and mechanical treatment may be utilized where consistent with the Wilderness Act, they are rarely considered because wilderness areas do not fall into the high priority areas as those areas closer to large communities. Without planned prescribed fires, fuel loads will build and increase the intensity of fires. Prescribed fire in wilderness also may not be used to solely benefit wildlife, vegetation, forage or other resources. These resources are important to the rural lifestyle. For the past 15 years, we have been wildland and structural firefighters with Mayhill VFD, located in the Sacramento Ranger District. David has vast firefighting experience, as he was a career firefighter with Farmington FD in Farmington, NM. He has served as Incident Commander, Engine Boss, EMT, or Division Chief on nearly every wildfire in the Sacramento Ranger District since 2006. Gail has served as the Assistant Chief, firefighter, or EMT during these fires as well. We know the on the ground danger in this part of the Lincoln Forest, as our fire district encompasses 150 square miles in our first response area, including Lincoln National Forest lands. We also respond to an additional 3316 sq. miles in the Sacramento Mountains as mutual aid. The Mayhill Fire District for many years has faced extremely high-risk fire seasons, experiencing drought conditions for 9 of the past 11 years. 2017, 2018, and 2019 were some of the worst drought years in New Mexico in the past 100 years. Many years, Mayhill VFD has its first wildfires of the year in January, even at 7500-8000 foot elevations, when there has been little snow and lots of high, dead grass and heavy fuel load. In an article written by Katherine Sanchez of the Lincoln Forest and Dan Ware of NM State Forestry, they state that the prolonged drought and extreme weather conditions in the Lincoln Forest have caused an increased mortality by bark beetles in numerous tree types, leading to an increased risk of fire spread. This risk is coupled by a Looper Moth infestation and Needle Cast Fungus, a result of drought conditions. The Looper infestation has alone killed more than 7,000 acres of winter conifers. The Needle Cast Fungus has affected the pinon pines in the 6000 ft. -7000 ft. areas in our district, killing large stands of trees on thousands of acres and creating extreme fire danger. The regional forester has titled our district as one of the top-rated wildland/urban interface fire potential areas in the nation because of its fuel load and population interface. New Mexico State University researchers have rated our fire district with 4's (the highest rating) in the areas of extreme drought, wildfire, high wind, and flash floods (due to previous fires destroying the watersheds). The Mayhill Fire District has experienced catastrophic and devastating fires: 1. Mayhill Fire in 2011: 31,831 acres burned, 4 homes lost, 800 threatened and saved, numerous outbuildings and vehicles lost, the entire town of Mayhill was evacuated and saved. This fire spread to within a mile of the proposed wilderness area. 2. The Rio Penasco Fire in 2002 (began in our district): 16,000 acres burned, 20 homes lost, 600 homes threatened and saved. This fire burned within 4 miles of the proposed wilderness area. 3. The Walker Fire in 2003 (in our district) burned 5,000 acres, 450 were evacuated, 24 structures lost, 200 homes threatened and saved. This was all within 5 miles of the proposed wilderness area. 4. The Scott Able Fire in 2000 (began in adjacent district, spread to our district): burned 16,034 acres, 64 homes

and 16 outbuildings lost, hundreds of others threatened and saved. This fire burned within a few miles of the proposed wilderness area. This is just to name a few of the numerous fires in this area. Our point to this is that while we understand the benefits of wildfires, the Lincoln Forest is at high risk of catastrophic wildfires, and the wilderness designation makes the potential even higher because of the restrictions in fighting fire and pre-suppression activities in these areas. We understand that fire trucks carrying vital water supplies and air attack may be used in wilderness, but they must be authorized by the regional forester, generally taking hours and even days before they are available for use. To put this in perspective from a fire standpoint, initial attack is the most important period of firefighting in order to prevent the type of catastrophic fires now seen in California. Without the immediate use of water on wheels, pumps, and air attack, the fires in the Lincoln Forest quickly become epic, as did the Little Bear Fire of 2012 which started in the White Mountain Wilderness Area a mere 30 miles from our fire district. The Little Bear Fire burned 44,330 acres and 242 homes. This fire drew strong political interest because of the number of homes lost, the size of the fire, and the previous tensions over pre-fire forest management. Those tensions over the Lincoln Forest management still exist today. What will tensions be when the Lincoln cannot do much pre-fire mitigation in the proposed wilderness areas?Mayhill VFD and our automatic and mutual aid help are generally working a fire within 10-20 minutes. On many fires, it is an hour or two before Lincoln fire personnel can be on scene because of the sheer size and layout of the segmented forest district. If we have to use the Minimal Impact Suppression Techniques required in wilderness areas, almost any fire will almost immediately blow up into a large incident. Mayhill VFD has fought several fires within the proposed wilderness area in the Sacramento District. We have been able to avoid disastrous results because we had the luxury of utilizing large units with thousands of gallons of water that we were able to get near the fires. This new wilderness designation would slow that process by what would seem eons to firefighters. Volunteer firefighters are an aging group, and Mayhill VFD is no exception with more than half of our firefighters over the age of 65. The wilderness designation will limit how many responders can hike into a fire and do only the tiring physical work of digging fire containment lines. The safety of our firefighters and citizens are at risk.2. Hand-in-hand with fire management is the issue of air quality. Agency prescribed fires average 134 acres while a wildfire averages well over 1000 acres, with those in wilderness areas even larger. The EPA just released a 438 page study of smoke impact, [ldquo]Comparative Assessment of the Impacts of Prescribed Fire Versus Wildfire (CAIF): A Case Study in the Western U.S.[rdquo] The results are not surprising, but one of the key insights is that smaller wildfires or prescribed burns produce fewer public health impacts and better air quality than larger wildfires. To the American public, one of the most important aspects of visiting a wilderness area or a national forest is the clean air quality. It is even more important in the Lincoln National Forest where SDSS telescopes are located at Apache Point Observatory (APO) in Sunspot, New Mexico. The observatory is surrounded by the Lincoln National Forest in the Sacramento Mountains, and sits on a mountain 9,200 feet above sea level, where the atmosphere contains little water vapor and few pollutants. Because the site is so high and so far from major cities, the night sky seen from APO is among the darkest in the United States. Entire communities within a few miles of the proposed wilderness area are built around these clean skies and telescopes. Telescopes are placed atop the mountains on private property and accessed remotely from all over the world. The "transparency" of our skies is phenomenal. Our 6300' to 9200[rsquo] altitude puts the telescopes well above most of the atmospheric borne pollution and particulate matter. The Sacramento Mountains are on the high desert and our skies benefit from the clean, dry air associated with desert environments. This industry is concerned about the potential of wilderness start wildfires, the size of those fires, and the potential smoke impact from them.3. U.S. Senator Martin Heinrich of New Mexico has made public access to state and federal lands his campaign mantra. Designating these areas in the Lincoln do the exact opposite. The U.S. Census Bureau recently released the new national data. The largest growing population group is the 65 and older, increasing over 30% since the last census. Thus, a wilderness designation with no motorized or bike access will prevent many of the largest growing segment of our population from access to this wonderful area. Currently, many of this age group use the existing cherry stem roads in the area to view the scenery and wildlife. We are very familiar with the proposed area. There are numerous unmaintained and two tracks that are being used for maintenance reasons and being used illegally for hunting.4. When a person dreams of visiting a wilderness area, he or she thinks of solitude. Obviously, whoever proposed this Sacramento wilderness area does not live near it. The USAF uses the airspace over the Lincoln for low level military training flights, day and night. Have you contacted them? Are they

going to suspend their flights and training missions? Over the years, we are talking about the U.S. and German Air Forces using the airspace in over the proposed wilderness to train and fly fighter planes: F-4 Phantom II, QF-4, German Air Force Tornado, T-38 Talon, MQ-1 Predator Unmanned Aircraft System, and the MQ-9 Reaper Unmanned Aircraft. Just this week, they flew numerous training ops over the proposed wilderness area. We saw Apache Attack helicopters low enough to drop a soldier and take off. The noise level during these flights is deafening and often times spooks our livestock and dogs. Page 134 of the Draft Plan states under the attributes used to describe wilderness character: outstanding opportunities for solitude or primitive and unconfined recreation.[rdquo] This proposed area does not qualify for this.5. In 2018, the USFS reported that it had eradicated over 1.5 million acres of marijuana plants on their lands. We have run into them on numerous occasions while fighting wildfires, hiking, or hunting. These illegal grow operations can be harmful as they alter the landscape while leveling hills for crops, diverting or damming creeks, and even using massive amounts of pesticides. This is becoming more common in wilderness areas because of the challenges they bring to law enforcement. Personally, we do not want more criminal activity and drug operations in our area. 6. Anyone who lives in the Lincoln knows that we have good personnel, but they are stretched to the max. This comment period is case in point. This will affect their ability to maintain the wilderness and scenic appeal required of a wilderness designation. Will more funding come with the designation for more personnel? Law enforcement on horseback or foot is challenging; in fact, any work, studies, or other activity takes more time in a wilderness because of the restrictions in place. This will also impact the local sheriffs, NM Game and Fish, and NM State Police who provide backup and other services on USFS lands. The Wilderness Act states that once the area is designated as wilderness, the agency responsible will preserve and administer the area for recreational, scenic, scientific, educational, conservation, and historic use. Who is going to do this? This area was the first road closure area in the Lincoln. USFS personnel have spent decades trying to enforce this closure and still have not been successful. Signs do not work. Barriers do not work. And, simply stated, there are not enough personnel to patrol a closure, only blocking out the law-abiding citizen.7. On page 223 of the proposal, it states, [ldquo]Coordinate with the New Mexico Department of Game and Fish on the management of wildlife within the wilderness using techniques consistent with wilderness character.[rdquo] Gail has served on the NMDGF Commission two different times, for a total of 6 years, and only recently retired from it. She called NMDGF area personnel and was told that this was the first they had heard about a proposed wilderness area (October 21, 2021). Is this [ldquo]coordinating[rdquo] with NMDGF? Are they not in on the conversations about critical wildlife concerns? Law enforcement concerns? Again, this may be due to the fact that the Lincoln Forest personnel are over expended already. 8. On page 136 of the Draft Land Management Plan for the Lincoln National Forest, it states, [ldquo]07 Wilderness areas have minimal to no nonnative invasive species.[rdquo] Take a drive to this proposed area. At any given time, you can encounter feral hogs, barbary sheep (aoudads), wild burros, and feral horses. The list of nonnative invasive plant and insect species is as long or longer. As stated on page 224 of the Plan, these nonnative species will be treated in a manner consistent with wilderness character in order to allow native species to thrive. In the societal climate prevalent today, how is the USFS going to [ldquo]treat[rdquo] feral horses, wild burros, and barbary sheep currently present in the proposed wilderness area? 9. It has been well documented that with a wilderness designation there comes an onslaught of conflict due to the polarization of our society[rsquo]s values and a significant increase in the use of the area. Nonhunters do not want hunting in the wilderness. Backpackers and hikers do not like horses or evidence of horses on the trails and in the area. There are clubs and organizations that challenge members to visit and hike every wilderness area, causing huge spikes in weekend and holiday use. We personally believe that we should leave this area in the Sacramento Ranger District alone. It currently has light usage most of the year and will remain so if not advertised and promoted as a wilderness. Mule Canyon Road, only 2.5 miles in length and the western edge of the proposed Sacramento District wilderness area, is one of the most heavily hunted areas of the Lincoln which in turn means many camps. The last count by NMDGF found 87 camps during one hunt. Based on their 5 people average per camp, this makes 435 people in a small area. If we throw in hikers, horseback riders, and other recreationists on this road with a wilderness designation, the possibilities of conflict are extremely high. Mule Canyon Road is also very susceptible to flash floods with no means of escape. Take a drive on this canyon road, and look at the flood debris stacked high on the trees. Putting folks in there all year round can only increase the risk of flood harm to users. Mayhill VFD has had to evacuate campers numerous times during flood conditions up stream. In many

cases, even if the president or governor want to increase our wilderness lands, it may be best for that area to remain as is and remain the current gem. Wilderness designation should not become a political game. Our wilderness areas are indeed national treasures. With that said, not every area should be designated as such. The currently proposed area in the Lincoln National Forest Sacramento District is one such area because of the reasons forementioned. Please seriously take these concerns into consideration.Sincerely,David J. CramerGail J. Cramer