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Organization:

Title:

Comments: Revision of Forest Plan For the Gila National Forest #51887 08/29/2024
Objection Reviewing Officer
333 Broadway Blvd. SE Albuquerque, NM 87102
Dear Mr. Michiko Martin and Camille Howes (copy delivered to 3005 E. Camino del Bosque)
After reading the outdated 1986 Gila Forest Plan to give myself a starting point to compare the 2024/2025 revision plan. There is new mention of Climate Change and the pressure it will put on the forest also it is mentioned to push for riparian area, springs and watershed restoration and enhancement. Understanding budget and staffing are always a roadblock to progress, let's put those aside. On a personal note of disclaimer, having worked for the National Park Service and State of California in Natural Resource Management and Habitat Restoration there is background experience on my part. I was a "boots of the ground" member of the New Mexico Wild inventory team helping to collect data and documentation photos of approximately 750,000 acres of forest land surrounding the Gila, Aldo Leopold, and Blue Range Wilderness over a period of 4 years for the Forest Service to use. Our team used the strict guidelines for what and how to document what we observed both natural and man-made. Then moving forward to be a member of the public on the Forest Planning Team attending 15 sessions, field trips and being able to share input along the way since 2015. After reading the whole proposed Gila Forest Plan my #233 comments were included for review. Now that the final draft is coming to light here come more comments from me this time after skimming the whole plan and reading most of the responses from public comment, I am focusing only on potential recommended wilderness expansion and not the whole plan. So many people have expressed to me the reason they moved to Grant County is because of the Forest and Wilderness. They hike, camp, backpack, and horseback ride; love the trails and joined groups to help clear and maintain these trails. Instead of excluding areas of potential recommended wilderness to accommodate bike riders, perhaps the FS could look at forest trails in different areas that could be looped for bikes, electric bikes, day hikers and horse riders. To state that because an area burnt it will no longer be considered for inclusion for potential recommended wilderness, in my opinion, is unacceptable. The land will heal itself as it has in the past and will in the future. The FS Plan states mechanical treatments are necessary - on the other hand it also states, on a case-by-case basis mechanical equipment maybe authorized in wilderness. Comment 56 pg. 537 DEIS A-397 says mechanized equipment can be authorized on a case-by-case basis. Thus, the use of mechanical treatment is ok case by case and should not rule out potential additional recommended forest acreage for wilderness. It will take another year for all the powers that be, Chief of the Forest Service, Secretary of Agriculture, President of the United States to look at all the acreage to consider and make decisions on what to include, before the recommended acreage goes to Congress. 2024 being the 100th Anniversary of the 1st designated wilderness and what better way to celebrate than to increase as much as possible the recommended acreage within that very wilderness! My hope is that the Forest SERVICE will look to the future and move out of the past, to keep as much land as possible to remain untrammelled by man not only for the surrounding counties but for the health of the planet. Keep as much acreage as possible included in wilderness, as human population increases these places of outstanding geology, solitude, clean air, fresh water, native vegetation, vast New Mexico vistas, peacefulness and dark skies become ever more important. Be forward thinking, protect and expand the wilderness, it is a very special place, move to save it. So here are my two "Boots on the Ground" recommendations. I have included the maps because I know it is cumbersome and time consuming to go back and forth quickly. The segments I wish to include for recommended additional wilderness are immediately adjoining existing wilderness, ranked as Outstanding, High or Moderately High and are outlined in Black on the included maps. Proposal 1: W4: Outstanding, Manageable-YES, 12,458 acres. Adjacent to Aldo Leopold Wilderness. WSBI: High, Manageable-YES, 43,998 acres. Adjacent to Aldo Leopold Wilderness. SBI: Moderate High, Manageable-YES, 41,063 acres. Adjacent to Aldo Leopold Wild. B14: High, Manageable-YES, 5,380 acres. Adjacent to Aldo Leopold Wilderness. Bla: High, Manageable-YES, 5,741 acres. Adjacent to Aldo Leopold Wilderness. Blb: High, Manageable-YES, 265 acres. Adjacent to Aldo Leopold Wilderness. Blc: High, Manageable-Yes, 78 acres. Adjacent to Aldo Leopold Wilderness. BIO: High, Manageable-Yes, 15,909 acres. Adjacent to Aldo Leopold Wilderness. WBI: High, Manageable-Yes, 27,335 acres. Adjacent to

Aldo Leopold Wilderness. W2b: Moderate High, Manageable-Yes, 2,088 acres. Adjacent to Aldo Leopold Wild.SI: Outstanding, Manageable-YES, 48,067 acres. Adjacent to Gila Wilderness. WB2: Moderate High, Manageable-YES, 4,437 acres. Adjacent to Gila Wilderness. G3d: Moderate High, acres? Adjacent to Gila Wilderness.GI: Outstanding, Manageable-Yes, 20,525 acres. Adjacent to Gila Wilderness.RG4: Moderate High, Manageable-YES, 21,591 acres. Next to GI adjacent to Gila Wild.RG2: Moderate High, Manageable-YES, 61,067 acres. Next to RG4 adjacent to Gila Wilderness and close to the Blue Range Wilderness.QRI: High, Manageable-YES, 41,047 acres. Ranking of 14.7 almost Outstanding.RGI: Outstanding, Manageable-YES, 22,089 acres. Adjacent to Blue Range Wilderness. QGI: H_igh, Manageable-YES, 8,685 acres. Next to RGI adjacent to Blue Range Wild.QII: High, Manageable-Yes, 5,728 acres. Next to QGI & RGI adjacent to Blue Range W.PROPOSAL 1: Aldo Leopold Wilderness potential recommended acres= 154,315Gila Wilderness potential recommended acres= 155,687QRI potential recommended acres= 41,047Blue Range Wilderness potential recommended acres = 36,502PROPOSAL 2: {{maps printed in order of forest plan) Includes Outstanding, High, Moderate High and Moderate.QII: High, Manageable-YES, 5,689 acres. Adjacent to Apache Sitgreaves National Forest. QGI: High, Manageable-YES, 7,609 acres. Adjacent to QII & Apache Sitgreaves NF. QG2: Moderate, Manageable-Yes, 4,404 acres. Adjacent to QGI, QII & RGI & A.S.NF.These acres would add to the Blue Range Wilderness.QRI: High, Manageable-Yes, 36,691 acres. Adjacent to QR2, moderate.RI0a: Moderate, Manageable-YES, 536 acres. Adjacent to Gila Wilderness. RI0b: Moderate, Manageable-YES, 657 acres. Adjacent to Gila Wilderness.RGI: Outstanding, Manageable-YES, 21,895 acres. Adjacent to Blue Range Wilderness.RG2: Moderate High, Manageable-YES, 43,383 acres. Near Blue Range Wilderness.RG4: Moderate High, Manageable-YES, 20,398 acres. Adjacent to RG2. Adjacent to GI which is adjacent to Gila Wilderness.GI: Outstanding, Manageable-YES, 16,848 acres. Adjacent to Gila Wilderness, Adjacent to RG4 and G3d.G3: Moderate, Manageable-YES, 1,095 acres. Adjacent to Gila Wilderness.G9: Moderate, Manageable-YES, 2,856 acres. Adjacent to Blue Range Wilderness.GI0: Moderate, Manageable-YES, 3,709 acres. Adjacent to Blue Range Wilderness and Blue Range Primitive Area.GII: Moderate, Manageable-YES, 2,827 acres. Adjacent to Gila Wilderness. G12: Moderate High, Manageable-YES, 2,223 acres. Adjacent to Gila Wilderness. Bla: High, Manageable-YES, 5,741 acres. Adjacent to Aldo Leopold Wilderness. Blb: High, Manageable-YES, 229 acres. Adjacent to Aldo Leopold Wilderness.Blc: High, Manageable-YES, 48 acres. Adjacent to Aldo Leopold Wilderness.B9: This is confusing, Alt 4 includes 11,909 acres. Manageable-YES. Adjacent to Aldo Leopold Wilderness & Blc. Trails going through are not a problem. The cherry stemmed roads are left out of the boundaries so no problem. The private properties are to the east of the boundaries so no problem. Nice there are two valuable creeks.BI0: High, Manageable-YES, 15,181 acres. Adjacent to Aldo Leopold Wilderness & B9.BII: Moderate High, Manageable-YES, 15,181 acres (same as BI0??). Adjacent to Aldo Leopold wilderness.B14: High, Manageable-YES, 4,546 acres, Adjacent to Aldo Leopold Wilderness.SBI: Moderate High, Manageable-YES, 39,150 acres.SI: Outstanding, Manageable-YES, 46,437 acres. Adjacent to Gila Wilderness.S2: Outstanding, Gila Middle Box, Manageable-Yes, 24,523 acres. Not printed because it would be stand alone. Although it will have Gila River Wild & Scenic standing once the Bill is pas ed. Also valuable as a wildlife corridor for Gila River access.S6a: Moderate, Manageable-YES, 447 acres. Adjacent to Gila Wilderness. S6b: Moderate, Manageable-YES, 4,558 acres. Adjacent to Gila Wilderness.S6d: Moderate, Manageable-YES, 1,040 acres. Adjacent to Gila Wilderness. SWI: Moderate High, Manageable-YES, 128 acres. Adjacent to Gila Wilderness.Wlc: Moderate, Manageable-YES, 691 acres. Adjacent to Gila Wilderness.W3: Moderate High, Manageable-YES, 3,389 acres. Adjacent to Aldo Leopold Wild. W4: Outstanding, Manageable-YES, 12,459 acres. Adjacent to Aldo Leopold WildW7: Moderate, Manageable-YES, 642 acres. Critical Habitat, Adjacent to Gila Wilderness.Wbl: High, Manageable-YES, 26,852 acres. Adjacent to Aldo Leopold Wilderness.Wb2: High, Manageable-YES, 4,443 acres. Adjacent to Gila Wilderness.Wb4: Moderate, Manageable-YES, 13,682 acres. Adjacent to Gila Wilderness. Wb6: Moderate, Manageable-YES, 4,252 acres. Adjacent to Gila Wilderness.WSBI: High, Manageable-YES, 42,878 acres. Adjacent to Aldo Leopold Wilderness & W4.Bla, Blc, B9, BI0, BII, W3, W4, WBI, WSBI were involved in the 2022 Black Fire. "While the scenery may have changed in some locations, its value has not been reduced because the area and severity of burned landscape is consistent with the fire regime after a lightning-caused fire."PROPOSAL 2: Aldo Leopold Wilderness potential recommended acres= 138,413 Gila Wilderness potential recommended acres= 120,904Blue Range Wilderness potential recommended acres= 89,545 QRI acres= 36,699SBI acres= 39,150S2 acres=

36,691"Executive Order 14072 Strengthening the National Forest, home to cherished expanses of mature and Old Growth Forests on Federal lands. Forests provide clean air and water, sustain the plant and animal life fundamental to combating the global climate and biodiversity crisis. Deploy climate smart forestry practice and nature-based solutions to improve the resilience of our lands, waters, wildlife in the face of increasing disturbances and chronic stress arising from climate impacts."Forest Service needs to protect the Old Growth and Mature Forests not cut them down for timber harvest especially in the desert Southwest. There are very few areas where it is economically feasible to harvest timber around the Gila Forest. This was covered in the FS Planning Field Trip. The idea of not including areas for potential wilderness because of timber harvest is ridiculous, the terrain is so rugged and mountainous the cost for a small amount of harvestable timber would be exorbitant. It will be challenging for Forest Service staff to be forward thinking about climate change and to not fall back on outdated policy practices. I noticed that some of the data quoted was from the Northwest US. The Southwest is a whole different ballgame with different tree species, rainfall amounts, temperature fluctuations, substrate, plants, and animals. There are additional stresses being put on the Forest and Staff as population increases, trash left behind, campfires not put out, encroachment, ATV use has increased exponentially. This is your chance to expand wilderness acreage and protect the land from motorized vehicles. Help reduce the effects of climate change and the ever-increasing pressures placed against the forest ecosystems. The planet needs more wilderness not less. This is the 100th year anniversary of the 1st designated wilderness right here in Southwest New Mexico. Help celebrate this milestone by increasing the wilderness as much as possible. The lack of staffing issue in Arizona is not a valid reason to throw out areas of recommendation connected to the Blue Range Wilderness and Apache-Sitgreaves NF. Pointing fingers across the AZ & NM boundaries where one side is waiting for the other to make a commitment is not how to step into the future. Decisions for the health and protection of the forest are what matter. Aspen Mountain needs another look at, I was a part of the survey team, there is only a rough dirt road, leading to a gate closing the road, it is another mile to walk to the top. Taylor Creek is another area that needs a closer look. It is a very beautiful, lush area with several cultural sites and as much acreage as possible should be included for recommendation. Yes, grazing is a way of life for some people. There are 109 permit holders. Out of the 3.3 million forest acres, 2.6 million acres are managed for grazing. I am assuming most people that graze cattle in this area also have a horse or two to help manage the cattle. Horses are better to use than a vehicle, they tread more lightly on the land and don't create roads off of the Travel Management Plan. Using horses to maintain fence lines and round up cattle means less air pollution, less noise, less extensive over land travel especially steep slopes and hard to get to places. The question arises out of the 109 permittees how many use horses instead of vehicles to check & maintain fence lines and service water tanks? When was the last time all the allotments were checked by the FS grazing manager? A-65 Literature cited in response to comment is old data from 2008 Svejcar et al. and not relevant to here. Carbon Fluxes on North American rangeland is very different than Forest grazing allotments in the desert southwest. A-24 & A-25 Under comments of Alternatives in general. The preference is Alternative #5 over all other alternatives stating it is in the best interest of people, animals and plants because it contains more recommendations or proposals for special designations, which are protective in nature and consistent with emergency response plan. Emergency response plan is needed due to predicted climate change and related biodiversity loss. A-26 -A-38 Alternative #5 Best available science based data provided by botanical experts associated with the Gila Native Plant Society and as recommended in the Rare Plant Conservation Strategy. I am unaware if during this planning process the Gila Forest had a botanist on staff or just a biologist. Plants have not been given adequate attention in the past some of these rare plants grow nowhere else and species have yet to be discovered. Side note: 2 weeks ago a moth discovered on Signal Peak is the 1st recorded in NM. Goal of the Revised Forest Plan? 1. Move toward a shared vision for the Future of our public lands. I would like to have more wilderness! 2. Plan provides strategic guidance to manage cultural and Natural Resources on the forest balance multiple uses, connect people to their land and heritage, restore ecosystems, and watersheds and adapt to climate change. Exactly what defines Wilderness and I would like to have more Wilderness included. 3. Provide strategic, program level guidance of Gila's resources and uses for 10-15 years. Perfect, let's save the Gila Resources by increasing the Gila and Aldo and Blue Range Wilderness areas. How Will the Revised Plan differ from the 1986 forest plan? Based on the 2021 Planning Rule the plan will: 1. Have a stronger focus on outcomes rather than outputs. I would like to see more details here. What outcomes from which programs? Restoration of Springs, Creeks, and watersheds? More

critical habitat set aside. Larger botanical areas? More trails maintained. The outcome of hiring more Law Enforcement would benefit the outcome of the Travel Management Plan. Decommissioning the closed roads would enhance the scenery and the outcome would be stopping people from driving vehicles on closed roads. Keep in mind people that come to visit from other states do not have a copy of the Travel Management plan. Unless there is a sign or barrier, they have no clue it is a closed or decommissioned area. Habitat Restoration signs are helpful.

2. Base management actions on best available science and local knowledge. Use best available science, not old data. I have local knowledge; I live in the Gila Forest of the Burro Mountains. I pass on my knowledge to the Forest Service but rarely are actions taken and outcomes resulting. I often hear the excuse of having no budget or being understaffed.

3. Have the ability to adapt to changing conditions and stressors overtime. What ability is needed to be able to adapt to what conditions and stressors?

4. Use enhanced public participation. So many questions here, are volunteers needed? For what projects? How do you see the public participating?

GI, G12, RG4 = Mineral Creek to Sandy Point= the Grand Enchantment Trail Needs For Change Statement: Plan direction for Connectivity. More connection between the Gila and Blue Range Wilderness creates habitat connectivity and wildlife corridor. There seems to be a roadblock to recommending some areas for wilderness because roads are closed but not decommissioned. What is the hold up to have these closed roads decommissioned and restoration to occur? Some of the old roads I helped survey on the wilderness team had large trees, grasses and plants growing up on them. I have to say 72,000 acre (54,000 Aldo, 16,000 Gila, 2,000 Blue) recommendation for wilderness leaves me wondering why there are not more acres included. I was looking closely at the adjacent acreage to the Gila, Aldo & Blue Range wilderness areas. My hope is that the Aldo Leopold Wilderness recommendation would be closer to 150,000 acres and the Gila Wilderness recommendation would be closer to 150,000 acres and the Blue Range Wilderness recommendation closer to 36,000 acres. There were 1,219,019 acres to choose from with 100 polygons and at least 50 of those were contiguous to existing wilderness areas. This leaves me feeling like there is more effort put into excluding acreage than to include acreage since 1986. WOW! This shows a lack of using the best most recent survey data and photos for documentation of how valuable a resource additional wilderness is. No one knows where lightning will strike so do not exclude areas because of fire risk. I feel sorry for the forest, with staff changing so frequently, there is no consistency. Before I forget. I would like to include a special thank you to Jenny Natharius "Nessa" National Forest Staff. She has moved on now but has put so much time and effort into this plan sorting through the 27,000 comments in an efficient way. I know she put her heart and soul into the planning and was a consistent staff person through the planning process. She should be very proud of her work. There is a typo in response to comments page A-64. Paragraph #1 & 3 repeats the sentence. "There is conflicting science on how.....DEIS and FEIS."