

Data Submitted (UTC 11): 4/3/2015 12:00:00 AM

First name: Josh

Last name: Hicks

Organization:

Title:

Comments: Cibola LRMP Revision Scoping Comments - TWS et al

Dear Mr. Green:

We appreciate the opportunity to submit the attached comments in response to the Notice of Intent to revise the Cibola National Forest Mountain Ranger Districts Land and Resource Management Plan and prepare an associated Environmental Impact Statement. The referenced appendices and attachments to our comments are included in the copy sent via ground mail, which I am putting in the mail today. If you have any questions regarding this matter, please do not hesitate to contact me.

Respectfully,

Josh

Joshua Hicks

Assistant Director, National Forest Action Center

The Wilderness Society

303-650-1148

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We protect wilderness and inspire Americans to care for our wild places

Excerpts from attachment copied here 9/23/15 for coding purposes.

"We very much appreciate that the CNF provided the public the opportunity to participate in the crafting of the needs for change, and that the CNF posted the more detailed change statements online. While the proposed needs for change in the scoping notice are a good start, we believe there are a few shortcomings. We offer the

following revisions and additions to the proposed needs for change:"

""

"We request that the CNF conduct an analysis to identify how well protected each ecosystem is through existing protective land designations such as wilderness and RNAs, and disclose the effect of each alternative on the protection of under-represented ecosystems and the achievement of the substantive provisions in the rule related to ecological integrity and species diversity."

"We request that the agency identify unique elements that exist on the CNF, describe their current status of protection, and administratively designate in multiple alternatives including the preferred alternative those that are under-protected in order to ensure that remarkable natural and cultural resources on the forest are protected."

"The CNF must analyze and disclose the impact of not protecting the conservation values of those non-IRA lands that are identified in the wilderness inventory but that are not recommended for wilderness. Specifically, the CNF must analyze the impacts of 1) not protecting the wilderness character of these lands, which includes those values identified in the Chapter 70 wilderness evaluation process, and 2) not protecting the roadless character of these lands, which includes the ecological values summarized above."

"The CNF must also analyze and disclose the value of a system of protected lands (e.g., wilderness, recommended wilderness, IRAs, RNAs, relevant designated areas) to species, including their ability to move across the landscape, taking into account predicted environmental conditions and trends."

"we request that the CNF establish a standard that would manage areas recommended for wilderness exclusively for non-motorized and non-mechanized uses."

"We request that the CNF categorize recommended wilderness areas in the primitive or semi-primitive non-motorized ROS classifications."

"we request that the CNF manage fire in recommended wilderness identical to how it manages fire in designated wilderness."

"We request that the CNF maintain and restore the roadless values and wilderness character of Chapter 70 inventoried areas that are not recommended for wilderness in multiple alternatives including the preferred alternative. We request that the agency adopt the following plan components for these areas:"

"We request that the Forest Service designate in multiple action alternatives our proposed Sandia Mountain Outdoor Education and Natural Area, as well as consider a dark skies scenic area designation in the Magdalena District to facilitate star gazing and enjoyment of dark skies."

"We request that the CNF establish a management area to provide management direction for lands identified in the final wilderness inventory that are not recommended for wilderness; section C(4) of this letter offers plan components for the agency to use as it develop its alternatives."

"we recommend the following plan components and elements, which are supported by best available science, as the building blocks of a framework for sustainable management of forest roads and transportation infrastructure"

"We request that the CNF takes a 3-zone approach to fire management in the forest plan. These zones, as described above, are the WUI, fire-prone forest suitable for restoration, and remote backcountry that is best suited for fire use."