

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

First name: Oscar

Last name: Simpson

Organization:

Title:

Comments: REASON: SCOPPING COMMENTS CIBOLA NF RMP

Attached are our scoping comments for the Cibola National Forest Resource management Plan

Thanks

Oscar Simpson, State Chair

New Mexico Backcountry Hunters & Anglers

3320 12TH ST NW

Albuquerque, New Mexico 87107

505-345-0117

505-917-2134 CELL

Mr. Champe Green, Forest Planner

Cibola National Forest and National Grasslands

2113 Osuna Rd. NE.

Albuquerque, NM 87113

Sent via email

Re: Notice of Intent to revise the Cibola National Forest Mountain Ranger Districts Land and Resource Management Plan and prepare an associated Environmental Impact Statement.

Dear Mr. Green:

We appreciate the opportunity to submit our 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. If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely:

Oscar Simpson, State Chair,

Backcountry Hunters & Anglers,

12th ST NW, Albuquerque, NM 87107

NM

3320

505-345-0117

EM:

oscarsimpson3@yahoo.com

NM BACKCOUNTRY HUNTERS & ANGLERS

The New Mexico Backcountry Hunters & Anglers is a state chapter of Backcountry Hunters and Anglers - a national non-profit organization. Our members and supporters in New Mexico and across the nation have a deep connection and longing to return to the natural world to experience the wonders that the backcountry and wilderness provide. We cherish hunting and angling and realize our outdoor traditions are inextricably linked to a healthy environment. We believe that it is a privilege to experience the awesome power of nature and wildlife and it is our responsibility to recognize its importance and therefore we strive to preserve and maintain wild country - where human beings are only visitors. BHA's members greatly value undeveloped, natural areas of our national forests and other public lands. We work to maintain the backcountry values of solitude, silence, clean and free

flowing rivers and habitat for fish, fowl and large, wide-ranging wildlife. We strive to deploy a variety of legal and administrative tools to maintain these values for present and future generations.

#### Proposal for a Back Country Wildlife Conservation Area in the San Mateo Mountains

"The Datil Forest (merged and now part of Cibola), from the sportsman's standpoint, is the cream of the Southwest, and there is no part of the Datil country as interesting to hunt in as the San Mateos. It is a very rough region with a fair amount of water, and endless miles of yellow (ponderosa) pine forest interspersed with oak and pinon. Any year that the oak fails to produce acorns it is pretty certain that the pinons will produce nuts, so that the game is nearly always "hog-rolling fat." Aldo Leopold, from Aldo Leopold's Southwest

As one of the premier public land hunting areas in the West, we take a strong interest in the Cibola National Forest Plan Revision. Once named by Field & Stream as one of the 10 best public lands (#4) in the country, the Cibola offers excellent hunting opportunity for mule deer, bear and turkey. Part of what makes the Cibola National Forest such a high quality hunting destination is its large tracts of uninterrupted backcountry habitat, along with excellent public access. Accordingly, we offer the following balanced approach to maintain the area's high quality backcountry habitat, and hunting access that the Cibola National Forest offers, while still allowing land managers the flexibility to conduct habitat improvement projects.

Sportsmen take a keen interest in protecting this landscape that Aldo Leopold so eloquently described many years ago as "the cream of the Southwest." We propose that the areas identified below within the San Mateo Mountain Complex be managed for the habitat and hunting access that they provide, formally as "Backcountry Wildlife Conservation Areas" (BWCA). The following is a description of the areas that we believe warrant this geographic area delineation, accompanied by the suggested BWCA management prescription.

#### Why Wildlife Habitat Conservation in the San Mateo's Mountain Complex Matters

##### Habitat

The San Mateos Mountain Complex invokes a sense of remoteness and the opportunity for backcountry big game hunting for Coues deer, mule deer, black bear, elk, javelina, antelope and mountain lion. In addition, bird hunters are attracted to the area for opportunities to pursue three species of quail (Montezuma, scale, and gambel), mourning doves, band-tailed pigeons and turkeys. The area also provides important summer, wintering and calving habitat for elk & deer.

The large rugged tracts of uninterrupted non-motorized habitat is a central part of why this region's high-quality wildlife habitat. The overwhelming body of research (see references below) has shown that big game species depend on the type of roadless habitat that is common throughout much of GMU 17.

The San Mateo Complex was identified within the Western Governor Association's Critical Habitat Assessment Tool (CHAT) conducted by New Mexico Game & Fish Department. The region has also been identified by The Nature Conservancy as a key area for conservation.

##### Hunting Opportunity

Sportsmen seek out backcountry landscapes in search of the solitude, challenge and overwhelming reward that hunting our wild public lands provide. In addition to providing unparalleled and increasingly rare social values, research has shown that large tracts of un-fragmented habitat are biologically necessary for game species such as elk, as well as numerous other native non-game species. And generally, when wildlife populations are healthy, the ecosystem is healthy. The area (GMU 17) offers high quality and highly sought after publicly accessible hunting opportunity for both elk and mule deer. Accordingly, it has formally been ranked by New Mexico Game & Fish as a "quality" and "high demand" unit. While other units boast higher overall success rates, outside of formally designated Wilderness areas there are few other regions in the state that offer a comparable level of public, backcountry big game hunting opportunity.

Deer hunting in this area (GMU 17) is excellent. In addition to consistently having above-average bucks, this unit is home to the state's #2 non-typical mule deer. The large tracts of rugged, undeveloped, public country in this unit offer hunters with a unique backcountry experience.

The turkey hunting in GMU 17 is even more well-known than the big game hunting. Home to a healthy

population Merriam turkeys, the spring turkey success rate near 70% and is more than double the state average, which hovers around 30%.

#### Public Access

As the population in New Mexico continues to increase, so will the demand for high quality, publicly accessible hunting units, like those found in the San Mateo's. The proposed geographic area would maintain existing public access as it is, while ensuring that habitat is not lost or fragmented through the development of new routes.

#### Recreation Economy

Hunting in the New Mexico provides important economic revenue, which is no small part fueled by quality public access and habitat in areas such as the Cibola. To sustain the hunting industry, we need to maintain the wildlife populations upon which it depends. Maintaining large tracts of quality intact habitat provides an assurance that wildlife populations will remain healthy, along with the hunting economy.

#### Climate Change

The proposed Backcountry Wildlife Conservation Area would provide landscape-scale wildlife corridor protection between the Withington and Apache Kid Wilderness Areas, as well as the adjacent Aldo Leopold Wilderness, which will help mitigate the potential impacts of climate change by providing migration corridors. The proposed BCWA would also cover habitat at different elevations, allowing wildlife to migrate both North-South and upwards in elevation.

#### Water

In addition, the proposal would provide some level of protection to the natural water sources in the area, which are becoming increasingly important to both wildlife populations and the residents of New Mexico. As the region is expected to continue to experience drought protecting critical water sources is increasingly important - water sources which are spread out through the Backcountry Wildlife Conservation Area. Of particular concern are the springs that have been identified between the Withington and Apache Kid Wilderness Area.

#### Biological Importance

As confirmed by a 2004 Report by The Nature Conservancy (Vander Lee, Bruce et al. Chapter 10: Ecological and Biological Diversity of the Cibola National Forest Mountain Districts in Ecological and Biological Diversity of National Forests in Region 3) plant and animal communities in the region are diverse, ranging from semi-desert grassland to pinon-juniper, ponderosa pine, Douglas fir, spruce and aspen. The San Mateo's are the northern reach of the Mexican Madrean Encinal Woodland system with associated species such as red face warbler and painted red start. The area also contains critical habitat for the Mexican spotted owl. This largely roadless area is ecologically linked with the Gila National Forest and the Aldo Leopold Wilderness Area to the south and the Mogollon Rim to the west allowing species and genetic diversity to move along the Rocky Mountain Corridor.

Why a Backcountry Wildlife Conservation Area (BWCA) is Needed & Applicable to this Process

Forest Service Rule allows special management areas to be designated through the forest plan revision process. We are proposing this geographic area under this rule, to recognize the outstanding wildlife habitat and hunting opportunities available in the San Mateo region.

While the USFS currently has a number of administrative designations designed to prioritize management for recreation, ecological values, cultural values and more, there is currently no designation which obviously focuses on backcountry resource protection, while still allowing for land management flexibility.

Additionally, as America's original conservationists we sportsmen believe strongly in a Special Management Area that focuses on the integrity of the resource, rather than the user. We believe that by ensuring a healthy resource, we can ensure the land users traditions can persist.

#### Management Prescription for BWCA's

We support maintaining the management of lands within the proposed BWCA's largely as they are with focused management objectives that increase the ecological value of the landscape. Please see included Map for delineation of two management zones. The desired management conditions for the two zones are described below

#### BWCA - Zone 1: Wilderness and Recommended Wilderness Areas

Description: Covers the Apache Kid and Withington Wilderness Areas as well as the proposed Apache Kid

Expansion, Withington Expansion, and Panther Canyon Recommended Wilderness Areas.

Desired Condition:

Management Prescriptions:

- \*Will be managed for non-motorized, non-mechanized forms of recreation
- \*Will be managed to maintain its wilderness character.
- \*Will be managed to preserve or enhance scenic resources.
- \*Will be managed for primitive recreation settings.
- \*Mineral extraction will not be allowed.
- \*Timber harvest will not be permitted.
- \*Gathering of forest products for sale will not be permitted.

BWCA - Zone 2: Backcountry Wild

Desired Condition:

Management Prescriptions:

- \*While other existing uses should be allowed, habitat conservation within the Backcountry Wildlife Conservation Area should be prioritized over other uses
- \*All motorized use should be limited to those roads designated in the Magdalena Ranger District's forthcoming travel management plan. The construction of new roads or motorized trails within the Backcountry Wildlife Conservation Area should be prohibited. Temporary or permanent closure of roads that adversely affect key habitat areas should be allowed as needed. Motorized use off legal routes should be prohibited, except by agency staff in emergencies or during search and rescue operations.
- \*Hunting, fishing, trapping and other recreational activity (excluding recreational mining) should be allowed.
- \*Surface based mineral development should be prohibited within the Backcountry Wildlife Conservation Area
- \*Forest and vegetation management should be limited to wildlife habitat improvement projects, where there is a demonstrated need. Other wildlife improvement projects, such as the installation of guzzlers and water sources for wildlife, should also be allowed.
- \*Wildfire prevention and mitigation activities should be limited to areas where structures, private development, or critical infrastructure is threatened. Prescribed fire should be allowed and encouraged.
- \*Existing grazing rights should be honored and grazing improvements should be implemented to ensure ecosystem health.
- \*All existing camping, biking or other recreational facilities would be maintained. Future recreational development would be allowed only if it could be shown not to diminish the area's backcountry and wildlife habitat values. Wildlife habitat protection should be prioritized over demand for developed recreation.

Compatibility with Existing Management in Proposed Backcountry Wildlife Conservation Area

Currently, much of the area proposed within the Backcountry Wildlife Conservation Area is either designated wilderness, an inventoried roadless area, or we are proposing the agency recommend for wilderness. The management area would maintain the existing opportunities to experience the solitude and challenge that these wild lands provide, while also safeguarding the habitat.

Description of Areas Proposed for BWCA

The included map outlines the proposed San Mateo BWCA. These boundaries were selected to ensure that the proposed area:

- a)Best protects the range of high elevation summer habitat and low elevation wintering habitat
- b)Includes the inventoried roadless areas within the San Mateo region
- c)Provides some level of protection to those lands identified by the Forest Service in its Chapter 70 wilderness inventory
- d)Incorporates as much elk calving and wintering habitat as possible

Conclusion

The San Mateo region provides some of the finest wilderness-like big game and upland bird hunting in the state of New Mexico. The sense of solitude, challenge and reward this wild country provides rivals many of New Mexico's much more well-known wild lands. This opportunity is unique and should be protected as it currently is

for future generations to enjoy.

Supporting the region's unique backcountry hunting opportunities are large tracts of largely intact habitat. This habitat serves as the bedrock of the hunting economy as well a rich sporting tradition that dates back thousands of years.

NMBHA feels strongly that the wildlife habitat and hunting opportunity this region provides is unique enough to warrant special management in the forest plan in order to safeguard the habitat while still allowing land managers flexibility. The proposed Wildlife Conservation Area would do just that, both by prioritizing wildlife habitat and allowing existing uses to continue largely as they are.

Supporting Organizations:

NM Back Country Hunters & Anglers,

New Mexico Wildlife Federation

National Wildlife Federation

Dona Ana County Associated Sportsmen

Wild Turkey Sportsman's Association

Southwest Consolidated Sportsmen

Hispanics Enjoying Camping & Hunting Outdoors (HECHO)

References

<http://www.fieldandstream.com/articles/hunting/big-game/where-hunt-big-game/2009/08/10-best-public-lands-elk-and-how-hunt-them>

<http://www.outdoorlife.com/node/1005004839>

<http://www.backcountryhunters.org/index.php/our-work-our-values/wildlife/elk/613-elk-what-effect-roads>

<http://www.backcountryhunters.org/index.php/our-work-our-values/orv-responsibility/261-research-illustrates-the-need-for-responsible-ohv-use>