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Organization:

Title:

Comments: Comments on Phase 2 "Potential Wilderness Inventory and Evaluation Process"

September 23, 2015

Mr. Champe Green

Forest Planner

Cibola National Forest and National Grasslands

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Dear Mr. Green:

Thank you for the opportunity to comment on Phase 2 of the Cibola National Forest "Potential Wilderness Inventory and Evaluation Process." My comments will focus on the Bear Mountain region in the Magdalena Ranger District.

Regarding the Bears, I was pleased to see that nearly 26,300 acres are identified as potential wilderness in Phase 2. However, important areas now have been excluded and two key areas continue to be left out: the NE corner west of 354 and the area east of 354 but west of the powerline and north of 354O. I find it difficult to justify these decisions based on my own extensive field work:

- May - July, 2014: Survey of roads and developments throughout the Bear Mountain region. Comments based on these results were submitted during the Phase 1 process on 11/19/14.
- September 2015: Survey of fences and other features identified by the Forest Service as "Substantially Noticeable Features" in Phase 2 which resulted in certain areas being excluded from wilderness consideration.

In the attached document, I've provided the highlights of this field work. I have also provided a DVD with my

original data by hand delivery to the Cibola National Forest Headquarters on 9/23/15.

Based on the results of my fieldwork, I respectfully disagree with most of the Forest Service's assertions that fences and other features constitute "substantially noticeable features" sufficient to disqualify these lands as wilderness according to the Forest Service's criteria. I also found numerous instances in which the locations of SNFs as provided by the Forest Service are significantly inaccurate sometimes by nearly a mile.

These discrepancies lead me to conclude that the Forest Service did not perform an on-the-ground assessment of all of these features, which begs the question of how this information was obtained. Not only do these inaccuracies impede independent evaluation, they also cast doubt on the credibility of other information provided to the public by the Forest Service.

Sincerely,

Arian Pregenzer

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Excerpts from attachment copied here for coding purposes:

#### Phase 1: Identification and Inventory Phase

The Forest Service Identification and Inventory Phase (Phase 1) for wilderness in the Bear Mountains of the Magdalena Ranger District resulted in a map showing areas considered to have potential for wilderness (blue cross-hatched area in map below). This is also available at:

[http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprd3816212.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3816212.pdf).

#### Figure 1. Phase 1 Mountain Units Wilderness Inventory

I submitted my response to Phase 1 on November 19, 2014 and include it as Appendix 1. It included photos taken during more than a month of intensive field work between May and July 2014 documenting wilderness characteristics and human impacts throughout the Bear Mountains. Excepting one relatively small area in the southwest (the area between 169 and 506, south of the road designated as 24CA\*B), I concluded that the evidence supported including of all of the land identified by the forest service in D3\_5K5, D3\_5K6, and D3\_5K7 as wilderness.

I also provided photos and comments supporting the inclusion of two additional areas as wilderness:

- 1) The area at the northeast bounded by CR12A - CR12B - CR12C on the west, 354E to the south, 354 to the east, and the Forest Service Boundary to the north; and
- 2) The area east of 354 bounded by the BLM WSA on the east, and 354O to the south; with cherry stems for the first mile of 354XA going down Baca Canyon and 354Q going to my property, which would be an inholding. I provided reasons for including the less than 5000 acres west of the powerline as part of the wilderness.

Arian Pregenzer 9/23/15 2

#### Phase 2: Evaluation Phase

##### Introduction

The Forest Service has now provided a revised map "Phase 2 Inventory Results for Lands that may be Suitable

for Wilderness," as shown below. Regarding the Bears, it is very encouraging to see that nearly 26,300 acres are identified as potential wilderness in polygons D3\_5K7, D3\_5K6, D3\_5K5, D3\_ADJ9, and D3\_ADJ10. These are the areas shown in blue on the map.

However, important areas now have been excluded in D3\_5K7 and D3\_5K6. Moreover, the two key areas mentioned above continue to be left out: 1) the NE corner west 354 and the area east of 354 but west of the powerline and north of 354O.

Figure 2. Phase 2 Inventory Results

Arian Pregenzer 9/23/15 3

#### Forest Service Evaluation Criteria

The Forest Service used the following evaluation criteria used during Phase 2 to assess those lands for wilderness potential:

? Degree to which the area appears to be affected primarily by the forces of nature, with the imprints of humans substantially unnoticeable.

? Degree to which the area has outstanding opportunities for solitude or for a primitive and unconfined type of recreation.

? How an area < 5,000 acres is of sufficient size as to make practicable its preservation and use in an unimpaired condition.

? Degree to which the area contains ecological, geological or other features of scientific, educational, scenic, or historical value.

? Degree to which the area may be managed to preserve its wilderness characteristics, considering shape, configuration, legally established rights or uses, presence and amount of non-federal land, and management of adjacent lands.

#### Forest Service Identification of Substantially Noticeable Features (SNFs)

The Forest Service provided the following explanations of "improvements," including "substantially noticeable features" (SNFs, highlighted in yellow) that disqualify parts of D3\_5K7 and D3\_5K6.

Polygon D3\_5K7 "Fences on eastern side of polygon-concentration of fences, combination of steel and wood post, open vegetation PJ, (substantially noticeable); Fences throughout polygon - steel post with little or no vegetative screening (substantially noticeable); Ekins Well Windmill - screened with topography (not substantially noticeable); Bear Mountain storage/drinker - not much vegetative screening (substantially noticeable); distribution pipeline (black, under 6 inches) located in arroyo (not substantially noticeable), Bear Springs-spring box, screened (not substantially noticeable); Line of springs - small development, screened (not substantially noticeable); Cedar Spring windmill, two galvanized drinkers, solar panel are closer to road that points show (substantially noticeable) Cedar Spring pipeline, screened (not substantially noticeable); Tank-pit tank-earthen, with all berms and exposed soils (substantially noticeable); Adobe Springs tank-newer, earthen, with tall berms and exposed soils (substantially noticeable); Scott Spring - collection of points, spring, corral, steel, non-natural materials (substantially noticeable); Scott Spring wildlife trough (not substantially noticeable); Cluster of springs on western side most undeveloped or minimally developed (not substantially noticeable); Lumber Spring 2 - has pipeline with box, runs to 3 drinkers, more developed than others (substantially noticeable); drinkers-metal, 3 along pipeline, little vegetative screening (substantially noticeable); Grapevine spring and unnamed spring, other springs along fenceline through middle of polygon - little or no development (substantially noticeable (?)); water points along spring (not substantially noticeable); Carrizozo Spring wildlife, developed spring, storage, steel post, barbed wire enclosure, collection of improvements (substantially noticeable); Palo Blanco spring, concrete dam, spring box, drinker, two metal troughs (substantially noticeable); Springs along northeast boundary-little or no development (not substantially noticeable); Cement trough spring-minimal development, salt cedar (not substantially noticeable); Fall Spring Drinker-majority of development is at spring (not substantially noticeable); springs in central portion of polygon-undeveloped (not substantially noticeable)."

Polygon D3\_5K6 "Wildlife improvements-all underground catchments (not substantially noticeable); fencelines-most run perpendicular to landform, with sparse vegetation leaving little to no screening (substantially noticeable); Buckhorn

Arian Pregenzer 9/23/15 4

drinker and storage tank, 3 separate locations-non-natural materials, little screening, tank is evident due to size

and soil disturbance (substantially noticeable); Green Well storage tank and drinker-non-natural materials, solar, corral, grouping and concentration of improvements (substantially noticeable); Cheyenne drinker and storage tank-non-natural materials and tall tank (substantially noticeable); Pseudo Drinker-non-natural material (substantially noticeable)."

The Forest Service also provided digital data on the locations of the SNFs, which is shown on the map below, although the features were un-named and thus difficult to link to the text in their written explanations above.

Figure 3. Map of Substantially Noticeable Features

Arian Pregenzer 9/23/15 5

Fieldwork Challenges the Accuracy of the Forest Service Evaluation

In an effort to understand why these areas were excluded and to assess the Forest Service's identification of "Substantially Noticeable Features," I returned to the field in September 2015 to observe and document these features. For places that I couldn't reach by hiking (because of distance or private property or both) I used Google Earth to assess them. In the next section, I provide representative highlights of this fieldwork. I have also hand-delivered a hard copy of the raw field data in "kmz" file format to the Forest Service.

Based on the results of my fieldwork, I respectfully disagree with most of the Forest Service's assertions that fences and other features constitute "substantially noticeable features" sufficient to disqualify these lands as wilderness according to the Forest Service's criteria. I also found numerous instances in which the locations of SNFs as provided by the Forest Service are significantly inaccurate. The data presented in the next section will demonstrate that:

? The vast majority of fences in the Bear Mountains and environs are wood post rather than steel.

? Vegetation and rugged topography through most of the area is sufficient to screen fences and other human developments from view from most vantage points.

? Most stock tanks and other developments are located on roads that were cherry-stemmed in the Phase 1 Inventory, and therefore do not contribute to the deletion of land during Phase 2.

? The data provided by the Forest Service regarding the locations of "substantially noticeable" fences and other developments are often inaccurate by up to 0.75 mile.

These discrepancies lead me to conclude that the Forest Service did not perform an on-the-ground assessment of all of these features, which begs the question of how this information was obtained. Not only do these inaccuracies impede independent evaluation, they also cast doubt on the credibility of other information provided to the public by the Forest Service.

Summary of Conclusions and Recommendations

With the exception of land in the southwest corner of Polygon D3\_5K6, I conclude that fences and other developments disqualify no land in D3\_5K6 and D3\_5K7 from wilderness consideration.

Moreover, there are no features disqualifying land in the NE corner west of 354 and this should be added to Polygon D3\_5K7.

In addition, I strongly recommend including a significant area east of 354 and west of the powerline in the next phase of evaluation. Despite its falling below 5,000 acres, it meets other requirements for wilderness and its proximity to other wilderness would ease any management concerns.

A map showing the area north of 506 that I propose taking into the Phase 3 Analysis is presented on the next page.

Arian Pregenzer 9/23/15 6

Figure 4. Proposed Bear Mountain Wilderness for the Area North of 506.

Arian Pregenzer 9/23/15 7

Results of Fieldwork Performed in September 2015

The results of fieldwork are organized according to the features identified in writing and on the map as "substantially noticeable." They address the accuracy of the description of the feature and the finding that it is "substantially noticeable." They also address the characteristics of the area around the feature for wilderness attributes such as opportunities for solitude and unconfined or primitive recreation. This section should be viewed at 200% in order to clearly see the features in the photographs.

Polygon D3\_5K7

"Fences on eastern side of polygon-concentration of fences, combination of steel and wood post, open

vegetation PJ" and "Fences throughout polygon - steel post with little or no vegetative screening"

In September 2015 I hiked and photographed nearly 100% of the fences on the east side, the fence line from Hell's Mesa to the Bears High Point, and a significant portion of the fence heading east from Scott Spring. In my opinion, none of these fences constitute wilderness-disqualifying SNFs. In contrast to the assertions by the Forest Service:

? About 95% of the fences in this area are wood rather than steel. They were often rickety and broken down, serving no function.

? There was significant vegetation and rugged terrain throughout, which obscured the fence when not sighting right along it. Often only a few posts were visible from 50 feet away and the fences vanished into canyons, over ridges, and into tall grass.

In addition, the actual route taken by the fences is different than the data provided by the Forest Service and through more rugged terrain. For example, in the case of the fence going up from near 354R towards Hell's Mesa, then to the ridge of the Bears beyond, in contrast to Forest Service data, it:

? Does not connect across Hell's Mesa,

? Does not follow the ridge from Hell's Mesa west to the Bears (it drops off into heavily wooded arroyos before climbing), and

? Does not follow the ridge along the Bears to the Bears High Point, except for one short section near the end.

These discrepancies cast doubt on the method used by the Forest Service to assess the impact of these fences on wilderness potential, and on the manner in which they obtained the data.

Arian Pregenzer 9/23/15 8

Fence near 354 R and up toward Hell's Mesa

This fence starts at 354 just north of 354R (34°19'4.86"N, 107°14'6.97"W). It meets 354R after about a mile, and then parallels it until 354R comes to an end about 1.25 miles from 354. There is no evidence of any vehicular traffic associated with fence maintenance after this point, and indeed, the fence goes in and out of canyons until it starts up the side of Hell's Mesa. There is significant vegetation along the fence and the terrain drops down on either side, obscuring it from view when more than a few feet away. The fence is primarily wood post, with a few metal posts here and there and mostly not noticeable unless you are sighting along it. In my view, this fence does not constitute an SNF that would preclude the area from being designated as wilderness. Nor would wilderness designation interfere with fence maintenance after the end of 354R, as it is only accessible by horse after that point.

Figure 5. Left: origin of fence at 354 (34°19'4.86"N, 107°14'6.97"W). Middle: within about 100 feet, the fence descends steeply into the first canyon. Heavy vegetation and topography almost completely obscure it from view. Right: The fence is not visible from a few feet away as it drops into Baca Canyon (34°19'5.58"N, 107°14'16.36"W). All photos taken 9/13/15.

Figure 6. Left: typical stretch of fence through trees (34°18'45.66"N, 107°15'13.45"W). Middle: a little further on (34°18'36.07"N, 107°15'59.55"W). Right: further still, fence not visible at all from a few feet away, or looking up the ridge to Hell's Mesa (34°18'30.23"N, 107°16'9.60"W). All photos taken 9/13/15.

Arian Pregenzer 9/23/15 9

Figure 7. Left: Closer to Hell's Mesa, the all wood fence is difficult to see except from a few feet away. On the scale of these mountains it is insignificant (34°18'24.27"N, 107°16'19.29"W). Middle: Approaching Hell's Mesa: only a few posts are visible. Right: the fence ends with this magnificent juniper as its last post, just before the cliffs of Hell's Mesa (34°18'20.80"N, 107°16'38.58"W). All photos taken 9/13/15.

Fence from Hell's Mesa to ridge of Bears then south to Bears High Point

This fence is hard to follow because it goes into rugged canyons, does not follow the ridge, and is mostly obscured by vegetation. It certainly is not a wilderness-disqualifying SNF as the photos make clear.

Figure 8. Left: I started the hike near the end of 354P. From this vantage point, the fence over the shoulder of Hell's Mesa is not visible, even with binoculars. (34°17'34.47"N, 107°16'9.49"W). Middle: the old wood fence finally comes into view over the shoulder of Hell's Mesa when I'm about 50 feet away (34°18'3.60"N, 107°16'49.92"W). Right: Broken down fence ends at this juniper, just above cliffs. (34°18'13.69"N, 107°16'44.97"W). All photos taken 9/12/15.

Arian Pregenzer 9/23/15 10

Figure 9. Left: Contrary to the data provided by the Forest Service, the fence does not follow the ridge as it heads west from Hell's Mesa. Here a couple of posts are visible as it drops into the canyon (34°18'9.79"N, 107°16'48.48"W). The ridge of the Bears is in the background. Middle: I lost the fence after it went over the edge because of the steep terrain. I finally found it here, rickety wood and partially broken down (34°18'4.98"N, 107°16'56.14"W). Right: Fence heading west is unmaintained. Grass is knee high and very healthy (34°17'58.61"N, 107°17'10.00"W). All photos taken 9/12/15.

Figure 10. Left: Looking back toward Hell's Mesa (Ladron in the background), the all wood fence is barely visible on the side of the hill (however, this is as noticeable as it gets!) Not a wilderness-disqualifying feature in my opinion. Middle: Fence as it crosses over the ridge is broken down and open. (34°17'49.16"N, 107°17'51.04"W). Right: The fence drops into the canyon and does not follow the ridge of the Bears south, as shown by the lack of a fence in this photo looking south (34°17'46.42"N, 107°17'48.16"W). All photos taken 9/12/15.

Figure 11. Left: Fence reappears, coming up from the west (34°17'29.14"N, 107°17'49.29"W). Middle: fence not visible from a few feet off the ridge to the east (34°16'56.40"N, 107°17'49.59"W). Right: fence visible for a short distance as it descends to the west (down to meet 123FB). Not particularly obtrusive, even here at its most visible. Note the beautiful views and healthy grass (34°16'47.68"N, 107°17'55.82"W). Photos taken 9/12/15.

Arian Pregonzer 9/23/15 11

Fence at the end of 123FB on the west side of Bears

The fence shown on the right in Figure 10 should eventually reach 123FB. I surveyed 123FB on 7/2/14, and found no development towards its end. The following photos show the fence line down near 123FB. Again, they are not particularly noticeable.

Figure 12. Left: Fence at end of 123FB (34°16'44.26"N, 107°19'11.70"W). Middle: Gate with Forest Service sign (34°16'44.59"N, 107°19'11.52"W). Right: there are no tracks or fences visible looking up into the Bears from the end of 123FB (34°16'46.17"N, 107°19'10.09"W). Photos taken 7/2/14.

Fences in Baca Canyon north of the Fence to Hell's Mesa

A fence branches off from the Hell's Mesa fence and heads down towards Baca Canyon about 1.8 miles from 354. It heads north until it reaches private property, then heads east towards 354, then turns south to rejoin the Hell's Mesa fence just west of 354. There are a couple of fences leading north to 354E from the long east/west stretch. The terrain along much of this fence is very rugged, with significant vegetation. There are more metal posts near the ranch, although it remains largely wood. The fence is certainly not a wilderness-disqualifying SNF as the photos below make clear.

Figure 13. Left: Fence descending north towards Baca Canyon from the Hell's Mesa fence (34°18'43.11"N, 107°15'58.10"W). There are a few metal posts, but the fence is often broken down and hard to see from more than a few feet. Middle: No fences visible looking into the wild upper reaches of Baca Canyon (34°18'27.59"N, 107°16'13.72"W). Right: Fence vanishing into scrub oak (34°19'24.03"N, 107°16'1.29"W). All photos taken 9/13/15.

Arian Pregonzer 9/23/15 12

Figure 14. Left: As the fence heads east, huge junipers hide it from view (34°19'30.40"N, 107°15'42.05"W). Middle: first fence branching north toward 354E, showing a couple of metal posts. Note that vegetation remains heavy enough to obscure fence over large areas (34°19'35.49"N, 107°15'27.87"W). Right: Eroded and unused track coming up from 354V with wooden fence alongside (34°19'30.64"N, 107°14'41.68"W). All photos taken 9/13/15.

Figure 15. Left: fence heading south, quickly dropping into a canyon (34°19'35.63"N, 107°14'24.14"W). Middle: a few posts are visible as the fence heads up towards the ridge (34°19'10.55"N, 107°14'21.61"W). Right: Looking back down into Baca Canyon from the ridge above, the fence is not obvious (34°19'2.15"N, 107°14'24.39"W). All photos taken 9/13/15.

Arian Pregonzer 9/23/15 13

West Side Fence near Scott Spring Heading East

I hiked to this fence on September 19, 2015 from the end of 123QA up Scott Canyon. The fence enters the Scott Spring area from the south, then turns the corner and heads east. There were no vehicle tracks or fences during my approach. I found the fence as it enters the Scott Spring area from the south then followed it about a mile after it turned east. The fence was almost entirely down: wires broken and loose, all wood fence posts rickety. It

was hard to follow as it became obscured even by the tall grass. It certainly does not constitute a wilderness-disqualifying SNF, as it is hardly noticeable at all until you stumble over it.

Figure 16. Left: Start of hike looking up Scott Springs Canyon, where there are no tracks, fences or other development (34°18'44.29"N, 107°21'1.54"). Middle: The first sign of unmaintained fence heading south vanishing into arroyo amongst tall grass and wildflowers (34°18'5.69"N, 107°20'16.49"W). Right: a few feet away the fence is completely down.

Figure 17. Left: fence down upstream of the spring (34°18'8.61"N, 107°20'6.70"W). Middle: Fence is hard to follow as it is easily obscured even by grass (34°18'13.03"N, 107°19'46.25"W). Right: Rare stretch of upright fence as it proceeds east (34°18'21.74"N, 107°19'24.24"W).

Arian Pregonzer 9/23/15 14

"Bear Mountain storage/drinker - not much vegetative screening"

Although not obvious from the text, I concluded that this must be the storage tank and drinker near "Bear Mountain" just along 506 (although this would officially place it in D3\_5K6). There is no development at the location provided by the Forest Service and there is also significant vegetative screening (see screen shot and photo below). Using Google Earth, I found what looks like a "storage/drinker" about 1000 feet to the east. However, this development is only 700 feet (within the buffer zone) from 506 and therefore would not interfere with wilderness designation of this area.

Figure 18. Figure 4. Left: Google Earth screen shot showing my tracks around the location of the SNF designated by the Forest Service by a red X. It wasn't there. GPS coordinates: 34°12'51.03"N, 107°14'10.42"W. Imagery date: 10/4/13. About 300 feet above ground. Right: View of healthy vegetation in arroyo just a few feet away from the site designated by FS by X in the screen shot above. Huge junipers and pinons offer significant screening, in contrast to their claim. (9/14/15).

Figure 19. Storage tank and drinker located using Google Earth about 1000 feet west of site designated by Forest Service map. For scale, the "drinker" is about 10 ft diameter and the tank about 28 ft long. FS 506 is about 700 feet to the south. Because of its proximity to the road, this feature should not compromise the wilderness designation of the land to the north, as it could be included in buffer around the road. There is also significant vegetative screening except when viewed from above. GPS coordinates: 34°12'52.63"N, 107°14'01.16"W. Imagery date: 10/4/13. About 350 feet above ground.

Arian Pregonzer 9/23/15 15

"Cedar Spring windmill, two galvanized drinkers, solar panel"

These developments would not compromise the proposed wilderness, as they lie outside its boundary as originally proposed by Forest Service. However, I could see nothing looking down at this canyon from the rim of the canyon above. Using Google Earth, I found three features about 10 feet diameter that look like drinkers. However, I could see no evidence of a solar panel or windmill.

Figure 20. Photo taken from head of Cedar Springs Canyon with the Magdalena Mountains in the background. Although the supposed development at Cedar Springs is less than a half mile away and I'm looking straight towards it I see nothing at all. GPS coordinates: 34°17'29.98"N, 107°17'28.28"W. Photo date: 10/12/15.

Figure 21. Stock tanks as seen using Google Earth. The red X's above are the locations identified by FS. No evidence of solar panel or windmill from Google Earth. GPS coordinates: 34°17'06.65"N, 107°17'03.72"W. Imagery date: 10/4/13. About 250 feet above ground.

Arian Pregonzer 9/23/15 16

"Tank-pit tank-earthen, with all berms and exposed soils" and "Adobe Springs tank-newer, earthen, with tall berms and exposed soils"

I could not identify either of these locations on the topo map, so am not sure where they are. There is nothing resembling a "tank-pit tank earthen" near Cedar Spring that I could detect from Google Earth. By a process of elimination I also looked at the areas associated with the two red X's not otherwise identified (one at the upper end of CR12A and the other just N or 123FB. I could detect nothing at either of these sites. Also, I had surveyed CR12A on 6/19/14 and found no development in the upper reaches.

Figure 22. Left: Red X north of 123FB and SE of Scott Spring. I could find no development either here or up/down the canyon using Google Earth. GPS coordinates: 34°17'35.82"N, 107°18'42.92"W. Imagery date: 10/4/13. About 250 feet above ground. Right: I looked down on this area from the ridge above on September 12,

2015 and could see nothing from there either. GPS coordinates: 34°17'45.6"N, 107°17'59/89"W. Photo date: 9/12/15.

Figure 23. Left: Red X near top of CR12A. I can see nothing either here or up or down the arroyo using Google Earth. GPS coordinates: 34°21'43.87"N, 107°18'22.43"W. Imagery date: 10/4/13. About 250 feet above ground. Right: Cottonwoods near the area I surveyed on 6/19/14, about 0.3 miles up the canyon from the red X. I found no development here. Photo date: 6/19/14.

Arian Pregenzer 9/23/15 17

"Scott Spring - collection of points, spring, corral, steel, non-natural materials"

The area with developments near Scott Spring was not included in the Phase 1 Forest Service map, as it lies at the end of 123B which was "cherry-stemmed." I hiked to Scott Spring and surveyed the area on 9/19/15 and found that none of the developments were noticeable, except from a few feet away. The area is full of large trees (cottonwoods, ponderosas, pinons) and the canyon above the spring is narrow and lush. There is no development at all up the canyon above the spring. The old wood fences are mostly down. I observed nothing that would preclude this area being designated wilderness, especially if access to developments at the end of 123B were provided by cherry-stemming the road.

Figure 24. Top left: PVC pipe from Scott Spring. From this point on there has been no vehicle traffic, and it would not be feasible except with an ATV. Top right: the first sign of development is an old tire drinker with algae filled water. Visible only from a few feet away. GPS coordinates: 34°18'16.51"N, 107°20'14.22"W. Photo date: 10/4/13. Bottom left: remnants of concrete trough about 500 feet up the canyon from the tire. Not visible until you are right on top of it; bottom right: 20 feet upstream looking back the concrete is not visible at all.

Arian Pregenzer 9/23/15 18

Figure 25. Wooded canyon above Scott Spring has no development. However, it does have huge gamble oaks and ponderosa pines, in addition to juniper and pinon.

Figure 26. Left: the fences in the area are broken down and hard to find, even when you are looking for them. Right: what must have once been the corral.

Arian Pregenzer 9/23/15 19

"Lumber House Spring 2 - has pipeline with box, runs to 3 drinkers, more developed than others"

This spring is just above the end of 123BB. I surveyed the area on September 19, 2015 and found no development at the actual spring, other than a broken down fence enclosure that is not visible until you run right into it. About 200 feet down stream, I suddenly came upon a metal tank that was visible only from a few feet away, then a lid and other material about 200 feet down from that (similarly invisible except from a few feet). This is a very pleasant riparian area with tall grass in a narrow canyon with a great deal of tall vegetation, including ponderosas, pinons, and oaks. It is not cow trodden. None of these features have vehicle tracks nearby, nor are they visible using Google Earth. In my opinion they do not constitute wilderness-disqualifying SNFs.

Figure 27. Left: Broken down enclosure (all wood) at Lumber House Spring 2. Right: Lovely riparian area just upstream. GPS coordinates: 34°18'52.93"N, 107°18.58"W. Photo date: 9/19/15.

Figure 28. Stock tank and other features about 200 and 400 feet down canyon from the photos above. Heavy vegetation and topography obscure all these features except from a few feet away and prevents seeing them using Google Earth.

Arian Pregenzer 9/23/15 20

"Drinkers-metal, 3 along pipeline, little vegetative screening"

I could find no drinkers at the locations provided by the FS downstream of Lumber House Spring 2 (either in person or using Google Earth). I located one drinker / corral just south of the intersection of 123BB with 123B while I was hiking, and three others along 123B using Google Earth. These are in a line roughly parallel with the locations provided by the Forest Service, but about 0.75 mile west along 123B. None of these features should preclude wilderness designation, as they are on a road that could be cherry-stemmed to provide access to ranchers. In fact, were their locations shown accurately, they would not have been included in the Phase 1 inventory map, which cherry-stemmed 123B and 123BB.

Figure 29. Vehicle tracks at end of 123BB (left). They do not extend to the developments shown in previous photos. Ponderosas rise above the canyon a few feet away from the tracks, where all is undisturbed. GPS coordinates: 34°18'57.73"N, 107°19'26.72"W. Photo date: 9/19/15.



Figure 30. Left: I could find no development at these three locations, either in person (lower x) or using Google Earth (all three). My path and locations of photos is shown in the screen shot. The photo closest to the red X is shown on the right. GPS coordinates: 34°19'26.01"N, 107°19'58.05"W. Photo date: 9/19/15. Imagery date: 10/4/13. ~4,000 feet off ground.

Arian Pregonzer 9/23/15 21

Figure 31. Left: Using Google Earth I identified three stock tanks in a line roughly parallel and about 0.75 miles west of the red Xs on Forest Service map as shown in this screen shot with yellow pins. These are likely the drinkers mentioned in the write-up. Again, the map locations are significantly wrong. Right: stock tank near end of 123B, about 0.75 miles WSW of the lowest red X shown above. This is also shown on the Google Earth screenshot as "corral and stocktank 123B." GPS coordinates: 34°18'57.89"N, 107°20'28.43"W. Photo date: 9/19/15.

"Grapevine spring and unnamed spring, other springs along fence line through middle of polygon - little or no development"

The statement "little or no development" seems contradictory to the claim that this is substantially noticeable, so it may be a mistake. Using Google Earth in the area around the FS red X and Grapevine Spring, I could discern no development.

Figure 32. Grapevine Spring area has no discernable development. GPS coordinates: 34°20'05.8"N, 107°19'47.73"W. Imagery date: 10/4/13. About 200 feet above ground.

Arian Pregonzer 9/23/15 22

"Carrizozo Spring wildlife, developed spring, storage, steel post, barbed wire enclosure, collection of improvements"

This is very close to the NW corner of the originally proposed wilderness boundary off 123GA and 123GB. It and the Palo Blanco Spring below could be excised from the proposed wilderness without compromising the integrity of the whole. I did not visit this site because it is behind a locked gate on a track leading across private land. However, I've inserted 2 Google Earth screen shots showing small drinkers, PVC, and perhaps an enclosure (left), and couple of tanks with cows on the right.

Figure 33. Development around Carrizozo Spring. GPS coordinates: 34°22'02.41"N, 107°20'45.59"W. Imagery date: 10/4/13. About 300 feet above ground. Features are very difficult to see, but zooming in to 200% makes them visible. The red X's are the FS SNFs.

"Palo Blanco spring, concrete dam, spring box, drinker, two metal troughs"

This is very close to the edge of the originally proposed wilderness boundary. It and the Carrizozo spring above could be excised from the proposed wilderness without compromising the integrity of the whole. I did not visit this site because it is behind a locked gate on a track leading across private land. However, I've inserted a Google Earth screen shot below showing what seem to be two drinkers. I could not find evidence of a concrete dam or a spring box.

Figure 34. Two drinkers near Palo Blanco Spring. No evidence of concrete dam or spring box. GPS coordinates: 34°22'27.00"N, 107°20'1.65"W. Imagery date: 10/4/13. About 300 feet above ground.

Arian Pregonzer 9/23/15 23

Polygon D3\_5K6

"Fence lines-most run perpendicular to landform, with sparse vegetation leaving little to no screening"

I surveyed two fences in this polygon and found the Forest Service description to be inaccurate:

? First, rather than running perpendicular to land forms they generally run in the direction of a canyon, but at a slightly higher elevation. They go into and out of secondary feeder arroyos, all the while heading parallel to the main canyon floor.

? Second, there is significant vegetation at the south end of the Bears, which provides good screening, except when you are sighting right along the fences.

In addition, the data provided by the Forest Service is inaccurate as to locations of some of the fences, showing them running up a ridge where they might be particularly visible, when in fact they take a lower and more obscure route.

Fence between 506 and 354 near Deer Spring Canyon at the Southeast of the Polygon

This status of this fence is of particular significance. If it were an SNF as claimed by the Forest Service, it could

justify disqualifying the hills in the southeast corner from wilderness designation. However, these photos taken on 9/14/15 and 9/18/15 show that although the fence is steel post, vegetation obscures it from most vantage points except when sighting right along it. In addition, the grass in the area is very healthy. There is development at either end of the fence but access to these areas is provided through private property on the south and on the north by 354L and 354LL, both of which could be cherry-stemmed. Thus, nothing should preclude the southeast corner from being included in wilderness.

Figure 35. Left: Just above the private property, this is the first sight of the fence. Note the juniper cover and healthy grass (34°14'15.29"N, 107°15'25.06"W). Middle: Fence heading into arroyo among junipers. It is not visible 30 feet away. (34°14'27.16"N, 107°15'14.80"W). Right: Fence and junipers towards the north end (34°15'1.25"N, 107°14'45.51"W). Photos taken 9/14/15 and 9/18/15.

Figure 36. Flowers and grass in Deer Spring Canyon (left); Wilderness-worthy hills through tall grass (middle); and view of Sierra Ladrones (right). Photos taken 9/18/15.

Arian Pregonzer 9/23/15 24

Fence Heading into the Bears from the South above the Private Property on 506J

This fence heads north from private property towards the south ridge of the Bears. When I tried to find it on 9/14/15 by hiking cross-country, I had a difficult time because of extensive vegetation and the rugged topography. According to the Forest Service data it should intersect with another fence coming in from the SE about a mile above the private property, then proceed straight up the ridge to the Bears High Point. However, I found no intersection at this point (or 1000 feet up). In addition, the fence makes an angle and does not proceed up the ridge.

Figure 37. Left: all wood fence heading north (34°13'35.19"N, 107°18'4.71"W). Middle: Fence angles NE and does not go up the ridge (34°13'51.00"N, 107°18'7.34"W). Right: Past the supposed intersection with the fence from the SE, which I never found, the fence is barely visible (34°14'8.54"N, 107°18'2.21"W).

Figure 38. Left: Looking up at the south end of the bears through very lush gramma grass - no fences anywhere. This is incredibly healthy land (34°13'53.12"N, 107°18'7.09"W). Middle: View of the Magdalenas near the supposed intersection with fence from the SE, which I never found (34°14'13.37"N, 107°17'59.14"W). Right: Arroyo near 506L, where despite the proximity to private property, the vegetation and grass are still healthy (34°13'17.26"N, 107°18'18.23"W). This area was the healthiest I've seen in the Bears and is certainly worthy of wilderness protection.

Arian Pregonzer 9/23/15 25

"Buckhorn drinker and storage tank, 3 separate locations-non-natural materials, little screening, tank is evident due to size and soil disturbance"

The topo map shows a Buckhorn Tank about 1.5 miles up 24A (34°15'44.08"N, 107°19'17.41"W); Upper Buckhorn Tank about 1000 feet west of 24 on what is designated as 24BJ (34°14'28.19"N, 107°20'19.57"W); and Little Buckhorn Tank on 24 (34°13'35.95"N, 107°20'36.70"W). However, the Forest Service map includes no red X designations at these locations.

Buckhorn Tank: I hiked up 24A on July 2, 2014. It had some vehicle tracks, but no development, no PVC, excepting a large bermed stock pond about 1.6 miles from 24. Vehicular traffic from 24A did not appear possible past this point. According to Google Earth, development does not extend past this point, although there are signs of tracks in the 2013 photo.

Figure 39. Dry stockpond about 1.5 miles up 24A from 24 and Google Earth screen shot taken about a year earlier (also showing my tracks and locations of photos). GPS Coordinates: 34°15'44.08"N, 107°19'17.41"W. Photo date 7/2/14. Imagery date: 10/4/13.

Upper Buckhorn Tank and Little Buckhorn Tanks: These are located 1000 feet west of 24 on 24BJ and right on 24. They are both what I would call bermed stock ponds and are clearly visible on Google Earth. However, their proximity to 24 could place them in a buffer zone around 24, thereby not impacting the wilderness proposal.

Arian Pregonzer 9/23/15 26

"Green Well storage tank and drinker-non-natural materials, solar, corral, grouping and concentration of improvements"

This is likely the area just off the junction of 169 and 123, where 24 branches off. I did not recommend that this area be included as wilderness in my Phase 1 comments. It was also excluded from the Forest Service Phase 1

recommendation, so I do not understand why it would be mentioned here in Phase 2. Here I provide a photo of a large storage tank and a screen shot of the area showing two FS Point SNF red Xs as well as locations of my tracks and photos on July 2, 2014.

Figure 40. Developed area in the vicinity of 169 and 123 and 24. Not recommended as wilderness. GPS Coordinates: 34°12'44.84"N, 107°20'27.41". Photo date 7/2/14. Imagery date: 10/4/13.

Arian Pregonzer 9/23/15 27

"Cheyenne drinker and storage tank-non-natural materials and tall tank"

I believe this feature is located just off 169 on 506L. The photo below shows a tall storage tank and drinker about a third of a mile from 169. I did not recommend that this area be included in wilderness in my Phase 1 comments, nor did the Forest Service include it in their Phase 1 inventory.

Figure 41. Storage tank and drinker about one third mile from 169 on 506L. GPS Coordinates: 34°11'25.68"N, 107°18'35.78"W". Photo date 5/23/14. I do not recommend this area around 506 L as wilderness.

"Psuedo Drinker-non-natural material"

Again, I'm not sure where this feature is located, but a process of elimination leads me to believe that this is a stock tank that I photographed on 506L about half a mile from 169. Again, neither I nor the Forest Service recommended that this area be included in wilderness during the Phase 1 process, and I'm not sure why this was included in the Phase 2 process.

Figure 42. Could be the SNF mentioned as "psuedo drinker." Stock tank is barely visible in background. GPS Coordinates: 34°11'57.77"N, 107°18'23.96"W". Photo date 5/23/14. I do not recommend this area around 506 L as wilderness