Data Submitted (UTC 11): 9/28/2015 12:00:00 AM First name: Paul Last name: Krehbiel Organization: Title: Comments: Comments on the Wilderness Inventory and Evaluation Process

Attached are two plain text files with comments on the Wilderness inventory process. One of the files pertains to the inventory for the Magdalena Mountains, and the other to the inventory for the San Mateo Mountains.

These follow up and go into more detail on comments I made in discussing the issues with Forest Service personnel during the August 4 public meeting in Magdalena. They are slightly belated due to my busy schedule and the need to carefully go through and understand the Phase 2 information and maps.

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This text was copied from the attachment by FS personnel on behalf of the commenter.

Comments in response to Inventory and Evaluation Process draft document dated July 21, 2015, obtained at the public information meeting in Magdalena on August 4, and the Phase 2 Inventory maps for the Magdalena Ranger District.

These comments concern the inventory for the Magdalena Mountains, as summarized in the above documents.

Area D3\_5K2:

This area has been excluded from the Phase 2 inventory due to being reduced from its original size of 5,166 acres to 4,742 acres and considered to be of insufficient size to be managed in an unimpaired condition. In addition it is stated that it is not contiguous to the Langmuir Research Site.

According to the Phase 1 map available at http://www.fs.usda.gov/Internet /FSE\_DOCUMENTS/stelprd3816212.pdf, and the more detailed Phase 2 maps, the area is clearly adjacent to the Langmuir Research Site along its NW border. I am personally familiar with the Langmuir Research Site and with the inventory area in question. The common border between the two is at high altitude and rugged terrain immediately below South Baldy peak and the Magdalena ridge extending both north and south from the peak.

Most of the land in the inventoried area is very rugged and/or undeveloped,

and would be easily managed to retain its unimpaired state. It has survived as such for over 50 years that I have lived in Socorro and worked at Langmuir, without benefit of special management.

In addition, the area borders on its northern boundary with area D3\_5K1 in the north-central part of the Magdalenas, which remains on the Phase 2 inventory list. The dividing line between the two is Mill Canyon, which is not a major impediment to considering the two areas for Wilderness designation. The narrow canyon houses the historic Frenchie Cabin and provides access to a relatively small, similarly historic but largely unproductive gold mine on the Magdalena Ridge area. Neither of these features detract significantly from the wildness of the area. From my personal experience of hiking in the area they do not detract from the opportunities for solitude, nor from the spectacular vistas looking westward from the Magdalenas over the San Augustin Plains area and the San Mateos to the southwest.

If a Wilderness Area is recommended and established in the Magdalenas, which I would strongly advocate, it needs to include the full extent of the Magdalena ridge extending northward from the South Baldy to the North Baldy area, including the west side of the ridge area constituting the D3\_5K2 area in question. The Wildnerness area should be a geographic entity that extends well westward from the ridge both to the north and south of Mill Canyon. For these and the above reasons concerning the naturalness of the overall area, 5K2 should be reinstated the Phase 2 inventory.

### Area D3\_5K1:

This area has remained largely intact through the Phase 2 analysis and, combined with the similarly intact 5K3 area and area 5K2, is well qualified for Wilderness designation. My main comment concerning 5K1 is that the area immediately north of FR 39 in North Fork canyon needs to be added to the inventoried area, so as to not preclude it from being considered for a future Magdalena Wilderness. FR 39 should be cherry-stemmed out along its lower part and the remainder being included in the inventoried area, in the same manner that route 505B has been treated in the northern part of 5K1.

As currently inventoried, the area in question is unnecessarily and artificially excluded from being part of 5K1, in a manner that is inconsistent with the inventory decision for 505B. The artificial nature of the northern boundary of the excluded area is presumably due to being a grazing allotment boundary, but this is not important in the inventory and evaluation process.

### Area D3\_5K3:

This area encompasses the spectacular and highly scenic of Water Canyon Mesa and South and Sixmile Canyons, as well as higher terrain along the northeastern border of the Langmuir Research Site. Along with 5K1, 5K3 is a popular and widely used area for hiking and outdoor recreation, that is well qualified and suited for Wilderness designation.

#### Area D3\_Lang:

Except for the high-use area in its northwestern-most part, which is excluded from the inventoried area, essentially all of the Langmuir Research area is highly qualified for wilderness designation. In effect, it is already being managed as wilderness, both by the Forest Service and by the Langmuir group at New Mexico Tech, of which I am a long-time member. It is good that the D3\_Lang area has been added to the Phase 2 inventory, as this will allow it to be considered as an important part of a greater Magdalena Wilderness as the process goes forward.

The atmospheric studies being conducted on thunderstorms and lightning over and around the area are world-class. These and the development of the Magdalena Ridge astronomical observatory, along with other studies, are being conducted in a manner that has minimal impact on the area's naturalness, and would be compatible with wilderness designation. While I would personally support such designation for much of the Research Site, I do not attempt speak for the Langmuir group on this matter. I would add that the Langmuir operations are fully respectful of the research area's wilderness values. Several years back, a long, heavy research cable suspended over Sawmill Canyon and associated support installations were personally dismantled and with considerable effort hauled out of the canyon by the Langmuir Chairperson and staff, leaving no trace of its earlier presence. Every effort is also made on a continuing basis to retrieve balloon-borne instruments and lightning-triggering rockets and associated paraphernalia used during the studies.

The D3\_Lang area also includes two portions of land adjacent to the Research Site, on the SE and SW corners of the FS boundary. The SW portion is adjacent to the BLM's Devil's Backbone Wilderness Study Area (WSA). As noted in the Inventory and Evaluation Process document, this in itself requires the area to be inventoried. The area is also well-qualified to be part of a Magdalena wilderness, either by itself or in conjuction with the DC3\_Lang site if recommended for Wilderness designation.

Comments in response to Inventory and Evaluation Process draft document dated July 21, 2015, obtained at the public information meeting in Magdalena on August 4, and the Phase 2 Inventory maps for the Magdalena Ranger District.

These comments concern the inventory for the San Mateo Mountains, as summarized in the above documents. The comments follow up in more detail on mark-ups I made on the maps for which comments were solicited at the public information meeting in Magdalena on August 4.

The current Inventory and Evaluation process provides an excellent opportunity for the Forest Service to expand and unite two of the four Wilderness Areas in the Cibola National Forest - the Apache Kid and Withington Areas - into a major area unique to central New Mexico. I was involved in the initial study of the southern San Mateos in the early 1970s with the New Mexico Wilderness Study Committee. This was at the beginning of the USFS's RARE I and II processes, that led to the Apache Kid and Withington Wildernesses being designated in 1980. Unfortunately, a substantial part of the lands that should have been included in the original Apache Kid designation were stripped out by Congress. It is time this be fixed.

The Forest Service, with help from the Landscape Planning Teams and from the pubilc, has done a commendable job of inventorying the areas that are deserving of being added to the existing Wilderness areas. Essentially all of the areas identified in the Phase 2 inventory for the San Mateos are qualified to be added to the existing San Mateo Wilderness areas. In the following I comment on the inventories.

# Area D3\_5K16:

Although classified as a standalone area, 5K16 is very closely adjacent to Withington. It is a highly natural area that plays a key role in augmenting Withington and joining the northern and southern wildernesses in the San Mateos.

First, the western boundary of the area along Bear Trap Canyon road should extend up to the road below Hughes Mill campground and trailhead, rather than being displaced eastward to Spring Hollow Canyon only to rejoin the Bear Trap road a few miles to the SW. The excluded area is quite scenic along Bear Trap Canyon and provides easy access for short jaunts into the Wilderness Area. It is also just as natural with opportunites for solitude as the interior areas. Offset from the road itself will also provide a clear boundary for a recommended area.

It is also not clear why the area NW of the upper part of FR 96/864 has been left out on the upper eastern part of 5K16. The presumably unimproved roads and ways in the excluded area are no less intrusive than on the opposite, SE side of 864. The area would be a substantial island in the future Withingthn/Apache Kid Wilderness and needs to be given equal opportunity and status for being evaluated as the surrounding areas.

It is not clear from the Phase 2 maps which area the Grassy Lookout exclusion is in, but it is appropriately placed and sized. The recent West Red/East Red fire burned right up to Grassy Lookout and along the access road to the lookout, as well as up to and along FR 138 for several miles north of Grassy, as I saw a couple of weeks after the fire. It was an excellent natural fire that burned relatively cool and was quite well managed by the Forest Service. Inclusion of this area in the National Wilderness Preservation System will provide an excellent example and study area for how the forest recovers and is rejuvenated by such natural fires.

# Area D3\_ADJ7:

This is the area adjacent to Withington on the east side, bordering Withington along the Big Rosa Canyon road. Simply stated, it will make an excellent addition to the Withington area.

Areas D3\_ADJ5,J4,J1,J2,J3:

like the above eastern addition, these areas valuably add lower-altitude grassy and wooded areas to the northern boundary of the Withington area. The small J2 and J3 additions along the road to Monica Saddle and FR 138 south from Mt. Withington to Grassy presumably clarify the boundary along the route, which is good.

# Areas D3\_ADJ8:

These areas are hugely important adjacent additions all the way around the Apache Kid Wilderness. It will be very gratifying to see these lands finally recognized for their worth as Wilderness. I make particular note of the southern extension ADJ8.d southward along the Burma Road and up by the Luna Park area, and area ADJ8.e northward from FR 225 into Springtime Campground up to Springtime Canyon itself and Indian Creek.

It is in the latter area back in 1971 that my wife and our two-year old daughter and 2-month old baby son had a close encounter with a young bear. We had walked down into the area for a picnic, well away from where we parked the car. The encounter happened while I went off to quickly scout out the boundary up to and along Springtime Canyon. Fortunately, the bear went the other way from them. Needless to say, my wife was not a happy camper when I returned to the scene. Despite that, we have many happy memories of repeated trips to the Springtime Campground and Luna Park areas, and of hiking with friends up the trails to San Mateo Peak and Vic's Peak. I'm sure the area remains a popular entrance to the Wilderness Area to this day.

The other ADJ8 additions incorporate numerous canyons and peripheral peaks in all directions away from the southern San Mateo complex. Particularly important additions apparently made during Phase 2 extended the northern-most boundary of ADJ8 from The Park and Exter Spring areas northward to the Rosedale Road, where it joins ADJ7 on the east side of Withington and encircles the Grassy Lookout area to again join and extend ADJ7 on along its SW side. This further solidifies and enhances the connection of the two Wilderness areas.

Lastly, the satellite area D3\_5K19 immediately east of Luna Park and Rock Spring is an area I have not traveled in, but looks like a nice adjunct to the Apache Kid as well.

Kudos to the Forest Service for a job well done so far.