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Title:

Comments: Draft Forest-wide Ecological and Socioeconomic Desired Conditions - July 2015 Revision - NMDA

Comments

Good afternoon,

New Mexico Department of Agriculture, as a Cooperating Agency in the Cibola National Forest's Forest Plan Revision Process, submits the attached comments and feedback on the Draft Forest-Wide Ecological and Socioeconomic Desired Conditions document (dated July 17, 2015). Please let me know if you have any trouble opening our comments or have any questions.

Thank you,

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The below text was copied from the attachment and entered by Forest Service personnel on behalf of the commenter

Page # Line # Subject of
Comment

Comment

Throughout Throughout "Background
and
Description"
subsection
title

Please add the subsection title "Background and Description" after all section titles to be consistent with the rest of the document. An example of where the subsection title is missing is under "Surface Water Resources" on page 52, line 13. However, this is not the only instance and should be corrected throughout the entire document.

Page # Line # Subject of
Comment

1 16-18 Introduction To our understanding, the landscape teams have not yet provided input on "other plan content including standards, guidelines, and management approaches." Though we look forward to providing this level of input, these discussions have not yet taken place in detail; and this sentence should be revised accordingly.

Page # Line # Subject of
Comment

6 19-20 Forest Insects
and Disease -
Desired
Conditions

NMDA requests that an additional Desired Condition be added to this section that addresses monitoring, recovering, and mitigating severe and/or uncharacteristic disease outbreaks to ensure watershed health. It is not enough to simply desire that only endemic infestations will occur - severe outbreaks must be addressed.

Page # Line # Subject of

Comment

Comment

42 1-2 Fremont

Cottonwood-

Conifer

Please add the elevations at which this vegetation type occurs.

Page # Line # Subject of

Comment

52 2-4 Water Rights The beginning of the "Watershed Resources" section states,

"Water rights is also included in this section, since management of water rights is related to water resources..."

A water rights section is not included, and there is no direct discussion of water rights in this section. Please remove reference to a water rights section unless the section was removed in error, in which case the water rights section should be re-added and republished for public comment.

Page # Line # Subject of

Comment

53 7-8 Desired

Conditions:

Groundwater

Withdrawals

Given the relationship between groundwater and surface water, it may not be feasible to achieve this DDC due to the fact that groundwater withdrawals are a necessity for water access by communities and forest users alike - especially in times of drought, which are expected to become more frequent in the future. Also, the USFS does not have purview over groundwater withdrawal activity. Therefore, this DDC may not be feasible under the management of the Cibola NF's Forest Plan.

Page # Line # Subject of

Comment

59 12-15 Nonnative

Invasive

Species -

Background

and

Description

The Noxious Weeds Management Act (76-7D-1-6) directs

NMDA to develop a noxious weed list for the state, identify methods of control for designated species, and educate the public about noxious weeds. NMDA coordinates weed management among local, state, and federal land managers as well as private land owners. NMDA maintains a list entitled "Troublesome Weeds of New Mexico," which is available at <http://www.nmda.nmsu.edu/apr/noxious-weedinformation/>. The Appendix includes a table of troublesome weeds in counties that overlap and surround the Cibola NF. NMDA classifies noxious weeds into "Watch List Species," "Class A Species," "Class B Species," and "Class C Species," which are described in the Appendix. NMDA requests that special management consideration be given to all the species contained in the Appendix in order to limit, and hopefully eradicate, any noxious weeds in New Mexico.

Page # Line # Subject of
Comment

Comment

59 28 Nonnative

Invasive

Species -

Desired

Conditions

One desired condition for this section states, "Desirable non-native species are managed." This statement is too vague to achieve a desired condition. NMDA recommends that the statement be revised to state, "Desirable non-native species are managed in such a way that they do not conflict with the recovery of native species or existing multiple uses."

Page # Line # Subject of
Comment

61 23 Fire and Fuels

- Desired

Conditions

NMDA suggests that another DDC be added to this section regarding Wildland-Urban Interfaces (WUIs). We suggest, "Fire management strategies in WUIs and elsewhere are maintained at sustainable levels to protect lives, property, and watersheds." Specifically addressing WUIs will become even more important during the life of the Forest Plan, so including a DDC will assist in management direction now and in the future.

Page # Line # Subject of

Comment

61 26 Range and

Grazing -

Background

and

Description

The first sentence of this section states, "There is Congressional intent to allow grazing on suitable lands..."

The term "intent" should be replaced with "mandate" to reflect that grazing is mandated under the Multiple-Use and Sustained-Yield Act of 1960.

Page # Line # Subject of

Comment

61 29-33 Range and

Grazing -

Background

This portion of the Background addresses allotment management plans. NMDA requests that reference be provided to New Mexico Statute Chapter 76, Article 7C-1(B), which states, "...management plans may be revised or terminated or new plans developed from time to time after such review and careful and considered consultation, cooperation and coordination with all permittees, lessees and landowners involved and, if appropriate, with the New Mexico department of agriculture and the range improvement task force staff of New Mexico state university." NMDA remains committed to this purpose and is available to participate in this process at the request of the agency, permittees, or landowners involved.

Page # Line # Subject of

Comment

Comment

62 16-18 Range and

Grazing -

Desired

Conditions

One DDC in this section states, "Livestock grazing and associated management activities are in balance with the needs of wildlife forage, watershed groundcover, natural fire regime, and resilience to climate variability." NMDA requests that this DDC be edited to state, "Collaborative planning between grazing permit holders and the Cibola NF results in livestock grazing and associated management activities that are in balance with the needs of wildlife

forage, watershed groundcover, natural fire regime, and resilience to climate variability as well as the management needs of grazing permit holders." Including language that includes collaboration between the Cibola NF and forest users in this and other DDCs will help in the long-term success of the management of the forest.

Page # Line # Subject of
Comment

66 37-38 Lands -

Desired

Conditions

One DDC in this sections states, "Acquisition of lands facilitate efficient management strategies for the Cibola NF." While land acquisition may make sense from a forest management perspective, NMDA requests the Cibola NF exchange or sell existing Cibola NF lands to affected counties in conjunction with acquisitions to ensure a stable tax base for the affected counties. The DDC should reflect this equitable approach to land acquisitions.

Page # Line # Subject of
Comment

68 1-2 Minerals and

Geology -

Desired

Conditions

One DDC in this section states, "Reclamation is carried out concurrently with mining; restoration of the environment takes place at the earliest opportunity for each area on a mine site." NMDA requests this DDC be edited to state, "Reclamation is carried out concurrently with mining; restoration of the environment takes place at the earliest opportunity for each area on a mine site; and adequate bonds are collected to ensure appropriate closure for operations of all sizes." Adequate bonding provides the funding for environmental mitigation during and after the closure of a mine and must be ensured for long-term watershed health.

Page # Line # Subject of
Comment

Comment

73 Whole

section

Designated

Areas -

Desired

Conditions-

General

NMDA requests that an additional DDC be added to this section to address stakeholder involvement in management decisions. We suggest the following be added as a DDC:

"Forest Service management and decision making for designated areas will involve stakeholders involved in the management of a given area. This includes appropriate state and local agencies as well as grazing permittees and land users."

Coordination with stakeholders before management changes occur on both specially designated areas and undesignated areas will assist in the overall long term success of forest management and planning.

Page # Line # Subject of
Comment

74 15-16 Wilderness -

Desired

Conditions

NMDA understands the USFS is required to protect, "congressionally designated wilderness areas as well as management of areas recommended for wilderness designation to protect and maintain the ecological and social characteristics that provide the basis for their suitability for wilderness designation" (36 CFR 219.10 (b) (1) (iv)).

However, sustainable grazing management and access should be maintained in current grazing allotments to fulfil the multiple-use and sustained yield policies of the USFS. One DDC in this section states, "Recommended wilderness areas are managed to protect and enhance the wilderness character that exists at the time of recommendation."

NMDA requests this DDC be edited to state, "Recommended wilderness areas are managed to protect and enhance the wilderness character that exists at the time of recommendation while also maintaining existing multiple uses of the forest."

Page # Line # Subject of

Comment

Comment

75 19-34 Scenic

Resources -

Desired

Conditions

The DDCs in this section explain the importance of scenery and that scenery will be a component of all resource management decisions. NMDA asserts that scenery is not a scientific indicator of watershed health; while it can be used

as a quick (though subjective) visual tool, range health monitoring must take prevalence in management decisions for resources - especially grazing. NMDA requests that all DDCs that discuss management decisions based on scenery be edited to reflect this important point.

Page # Line # Subject of
Comment

80-81
and
Throughout
All
and
Throughout
Literature
Cited

The Literature Cited section is a useful resource. NMDA requests that citations be referenced throughout the body of the DDC in the applicable places either through footnotes or in-text citations. This will assist readers in understanding where information sources can be found much more easily