



Merced de Santa Barbara Land Grant

P.O. Box 564
Peflasco, NM 87553
505-927-1264

Board of Trustees

Bonifacio I Vasquez, President
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November 26, 2021

Michiko Martin, Reviewing Officer
USDA Forest Service
Attn: Carson Plan Revision Interested Person Request
333 Broadway Blvd. SE
Albuquerque, NM 87102

Dear Ms Martin,

The Santa Barbara Land Grant submits this letter requesting that it be identified as an interested person in the objections to the Carson National Forest Plan and EIS submitted by **American River**

The Land Grant would like to be identified as a body or I, Bonifacio I. Vasquez may be identified as chair of the Grant. Our address is provided above and is as follows:

Santa Barbara Land Grant Merced
PO Box 564
Penasco, NM 87553
bonifacio@windstream.net

The aforementioned objections, submitted by **Mike Fiebig** on behalf of **American Rivers** is of concern to the Santa Barbara Land Grant Merced because its promotion of the widespread designation of many, if not most of the river systems in northern New Mexico. We do not support the eligibility recommendation for the Cr 31• Rio Santa Barbara (all three forks.) While the Land Grant does not support the identification of eligibility for any of the Rio Santa Barbara including the portions within the Pecos Wilderness, it is particularly concerned with the 1 ½ mile segment of the river that lies between the Santa Barbara Campground and the boundaries of the Pecos Wilderness. This section of the river is the head water of several Acequias. These Acequia have their declarations and we claim priority of appropriation. Also, the Santa Barbara Land Grant has grave concerns with Wild classification since it could severely hamper any management efforts aimed at improving watershed, reducing the risk of catastrophic wildfire and for ensuring water quantity and quality for downstream acequia water right owners.

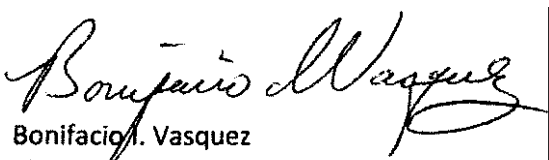
Due to this segment's proximity to the Santa Barbara Campground, there is actually very little opportunity for solitude on this stretch of the river. Approximately at the midpoint of the 1 ½ mile segment there is a man-made bridge constructed of concrete and dimensional lumber that allows people to cross from the westside to the eastside of the river. Also, the vast majority of the 1 ½ mile segment of the river is in a narrow canyon that is densely populated with tall trees, which blocks out most of the view to greater surrounding area. Therefore, since this 1 ½ segment of the river, from the Santa Barbara Campground to the Pecos Wilderness boundary, does not have true opportunities for solitude, does not offer a truly primitive experience, and does not have view of the entire basin of its expansive aspen stands, it does not have the qualifying Scenic outstanding remarkable value.

The Eligibility Evaluation draft states that the Rio Grande Cutthroat trout "RGCT" populations are suspected to be hybridized & non-native species are present. There is not a full barrier that separated this section." The Santa Barbara Land Grant is a proponent of the protection of the native Rio Grande Cutthroat Trout and recognizes that the Rio Santa Barbara is the ideal habitat for this native species. The Santa Barbara Land Grant questions the use of "suspected to be hybridized" when referring to the Rio Grande Cutthroat trout found in this segment of the Rio Santa Barbara. The Santa Barbara Land Grant could not find any evidence from the New Mexico Game and Fish that supports the notion that the Rio Grande Cutthroat Trout in the Rio Santa Barbara have been hybridized. In fact, the 2016 Statewide Fisheries Management Plan published by the New Mexico Department of Game and Fish states that there is a "Core Conservation Population of Rio Grande Cutthroat trout in the headwaters of the East, Middle and West Forks of the Rio Santa Barbara..." In addition, the Plan states the only other fish species present in Rio Santa Barbara are Brown Trout. Brown Trout and Rio Grande Cutthroat Trout are not known to cross breed since the Brown Trout spawn in the fall whereas the Rio Grande Cutthroat spawn in the Spring. Therefore, since there is no evidence on any Rainbow Trout in the lower Rio Santa Barbara River the claim that the "RGCT populations are suspected to be hybridized" is likely a false claim. While the Brown Trout do not breed with RGCT they do present a huge problem for maintaining RGCT populations because Brown trout are known for pushing out or marginalizing RGCT populations by taking over or dominating RGCT habitats. The Brown Trout which are larger and more aggressive will eat smaller RGCT. The 2016 Fisheries Management Plan also states that although the Rio Santa Barbara contains a Core Conservation Population of RGCT there are no barriers in place to prevent Brown Trout from invading the areas where RGCT Core Conservation Populations currently prevail. Conservation efforts to decimate the invading Brown Trout will not be successful unless fish barriers separating the two populations can be established in the river along this segment of the Rio Santa Barbara. There are several options for establishing fish barriers within the Rio Santa Barbara. One would be to establish barriers on all three forks of the Rio Santa Barbara. This is possible but does present some logistical challenges since all three forks are within the Pecos Wilderness. Another option would be to establish a fish barrier downstream of the three forks somewhere within the 1 ½ segment that lies between the Pecos Wilderness Boundary and the Santa Barbara Campground. None of these options are feasible if the segment of the Rio Santa Barbara being proposed in the draft Eligibility Evaluation are identified for management as eligible for Wild and Scenic Rivers Designation in the Carson National Forest Service Management Plan. Therefore, to not limit the ability to protect the Core Conservation Population of Rio Grande Cutthroat Trout, identified by NM Dept of Game and Fish as being present in the headwaters of Rio Santa Barbara, Cr31Rio Santa Barbara (all three Forks) in its entirety should be identified as **Not Eligible for possible designation under Wild and Scenic River Act.**

The Santa Barbara Land Grant Merced has submitted substantive formal comments through the development of the Carson National Forest Plan.

Thank you for considering the Santa Barbara Land Grant Merced as an interested party in the objection resolution process. We look forward to continue working with the Carson National Forest and our local communities in building an equitable land sound plan that will guide our shared stewardship of lands on which our communities continue to depend.

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Bonifacio Vasquez
Chair



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Attn: Carson Plan Revision Interested Person Request
333 Broadway Blvd. SE
Albuquerque, NM 87102

Dear Ms. Martin

The Merced de Santa Barbara Land Grant submit this letter requesting that it be identified as an interested person in the objection to the Carson National Forest Plan and EIS submitted by Joanie Berdie **of** Carson Forest Watch. The Grant would like to be identified as a body or I Bonifacio I. Vasquez may be identified as chair of the Grant. Our address is provided above and is as follow:

Santa Barbara Land Grant Merced
PO Box 564
Penasco, NM 87553
bonifacio@windstream.net

The aforementioned objection submitted by **Joanie Berde**, on behalf of **Carson Forest Watch**, concerns the Santa Barbara Land Grant because of the historical and contemporary impacts that wilderness designation has had and continue to have on land grant communities. The Forest Service has no authority to make decisions on land or other ownership. During the LMP assessment period the Forest Service failed to consider the Santa Barbara Land Grant position is that we still claim the common lands within the original boundaries for which a U.S. Patent was issued in 1905 and have been working to regain the use of these common lands. The Santa Barbara Land Grant maintains that the title by which the U.S. Forest Service obtained this land is clouded and can therefore be contested.

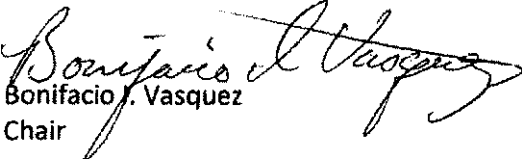
The Grant has a Petition of three hundred and forty (340) signatures against the Pecos Wilderness Expansion within the Santa Barbara and Trampas Land Grants. In November 2015, at a Land Grant meeting, of the one hundred twenty (120) people present only four (4) people were in favor of wilderness expansion. Also, during two Taos County Board of Commissioners meeting there seventy-six (76) people present voted against wilderness expansion. In July 2016 the State of New Mexico Legislative Council Service recorded "its opposition to any expansion of existing wilderness areas or the creation of new wilderness areas as part of the current forest plan revisions." The 52nd Legislature - State of New Mexico- second session, 2016, House Memorial 43, introduced by Sarah Maestas Barnes "Requesting the United States Department of Agriculture Forest Service and the United States Congress to consider alternative designation for land proposed to be part of an expanded Pecos wilderness area". In June 2016, a resolution against any wilderness expansion was taken

New Mexico Acequia Association
New Mexico Stockman's Association
New Mexico Land Grant Consejo (comprised of 20+ land grants)
Santa Barbara Land Grant Merced
Santa Tomas Apostol del Rio de las Trampas Land Grant

The Merced de Santa Barbara Land Grant has submitted substantive formal comments through the development of the Carson National Forest Plan.

Thank you for considering the Santa Barbara Land Grant as an interested party in the objection resolution process. We look forward to continue working with the Carson National Forest and our local communities in building an equitable and sound plan that will guide our shared stewardship of lands on which our communities continue to depend.

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Dear Ms Martin,

The Santa Barbara Land Grant submits this letter requesting that it be identified as an interested person in the objections to the Carson National Forest Plan and EIS submitted by **Amigos Brovos, New Mexico Wlild, Western Environmental Law Center, National Wildlife Federation, and Earthkeepers 360.**

The Land Grant would like to be identified as a body or I, Bonifacio I. Vasquez may be identified as chair of the Grant. Our address is provided above and is as follows:

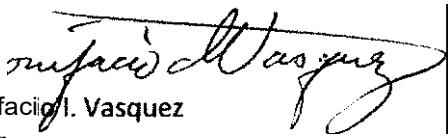
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The aforementioned objections, submitted by **Rachel Comm** on behalf of **Amigos Bravos, Kelly Nokes** on behalf of the **Western Environmental Law Center, Jeremy Romero** on behalf of the **National Wildlife Federation, Logan Glasenapp** on behalf of **New Mexico Wild, a.k.a. New Mexico Wilderness Alliance** and **Andrew Black** on behalf of the **Earthkeepers 360**, is of concern to the Santa Barbara Land Grant Merced because its promotion of the wide spread designation of many, if not most of the river systems in northern New Mexico. We do not support the eligibility recommendation for the Cr 31 -Rio Santa Barbara (all three forks.) While the Land Grant does not support the identification of eligibility for any of the Rio Santa Barbara including the portions within the Pecos Wilderness, it is particularly concerned with the 1 ½ mile segment of the river that lies between the Santa Barbara Campground and the boundaries of the Pecos Wilderness. This section of the river is the head water of several Acequias. These Acequia have their declarations and we claim priority of appropriation. Furthermore, due to this segment's proximity to the Santa Barbara Campground there is actually very little opportunity for solitude on this stretch of the river. Approximately at the midpoint of the 1 ½ mile segment there is a man-made bridge constructed of concrete and dimensional lumber that allows people to cross from the westside to the eastside of the river. Also, the vast majority of the 1 ½ mile segment of the river is in a narrow canyon that is densely populated with tall trees, which blocks out most of the view to greater surrounding area. Therefore, since this 1 ½ segment of the river, from the Santa Barbara Campground to the Pecos Wilderness boundary, does not have true opportunities for solitude, does not offer a truly primitive experience, and does not have view of the entire basin of its expansive aspen stands, it does not have the qualifying Scenic outstanding remarkable value.

The Santa Barbara land Grant Merced has submitted substantive formal comments through the development of the Carson National Forest Plan.

Thank you for considering the Santa Barbara Land Grant Merced as an interested party in the objection resolution process. We look forward to continue working with the Carson National Forest and our local communities in building an equitable land sound plan that will guide our shared stewardship of lands on which our communities continue to depend.

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Bonifacio L. Vasquez
Chair



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Dear Ms. Martin

The Merced de Santa Barbara Land Grant submit this letter requesting that it be identified as an interested person in the objection to the Carson National Forest Plan and EIS submitted by **the Center for Biological Diversity, WildEarth Guardians, Defenders of Wildlife, and Great Old Broads for Wilderness**. The Grant would like to be identified as a body or I Bonifacio I. Vasquez may be identified as chair of the Grant. Our address is provided above and is as follow:

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The objections, submitted by **Logan Glasenapp**, on behalf of **New Mexico Wild, Joe Trudeau** on behalf of the **Center for Biological Diversity**, and **Susan Ostlie** on behalf of **the Great Old Broads for Wilderness**, concerns the Santa Barbara Land Grant because of the historical and contemporary impacts that wilderness designation have had and continue to have on land grant communities. The Grant has a Petition of three hundred and forty (340) signatures against the Pecos Wilderness Expansion within the Santa Barbara and Trampas Land Grants. In November 2015, at a Land Grant meeting, of the one hundred twenty (120) people present only four (4) people were in favor of wilderness expansion. Also, during two Taos County Board of Commissioners meeting there seventy-six (76) people present voted against wilderness expansion. In July 2016 the State of New Mexico Legislative Council Service recorded "its opposition to any expansion of existing wilderness areas or the creation of new wilderness areas as part of the current forest plan revisions." The 52nd Legislature - State of New Mexico - second session, 2016, House Memorial 43, introduced by Sarah Maestas Barnes "Requesting the United States Department of Agriculture Forest Service and the United States Congress to consider alternative designation for land proposed to be part of an expanded Pecos wilderness area". In June 2016, a resolution against any wilderness expansion was taken by all member Land Grant Consejo meeting in Los Ojos, New Mexico. Resolutions against wilderness expansion were passed by the following political subdivisions of the State of New Mexico:

Mora County Commissioners
Rio Arriba County Commissioners

New Mexico Acequia Association
 New Mexico Stockman's Association
 New Mexico Land Grant Consejo (comprised of 20+ land grants)
 Santa Barbara Land Grant Merced
 Santa Tomas Apostol del Rio de las Trampas Land Grant

The Merced de Santa Barbara Land Grant has submitted substantive formal comments through the development of the carson National Forest Plan.

Thank you for considering the Santa Barbara Land Grant as an interested party in the objection resolution process. We look forward to continue working with the Carson National Forest and our local communities in building an equitable and sound plan that will guide our shared stewardship of lands on which our communities continue to depend.

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 Chair