

Data Submitted (UTC 11): 10/17/2021 6:00:00 AM

First name: David

Last name: Heft

Organization:

Title:

Comments: I would like to submit the following comments regarding the draft Forest Plan for the Lincoln National Forest. Page 64: Terrestrial Species and Habitats Desired Conditions, FW-TERSPI-I-DC, 03 I recommend removing the word "undesired". All non-native and invasive species act as environmental stressors to native species and habitats. Prior published research has shown the significant degradation of native habitats and severe competition between native and non-native species. All nonnative species should be considered as "undesired". This is of particular importance given the on-going and increasing impacts of climate change in the southwest. Page 65: Terrestrial Species and Habitat Objectives, 02 "Reconstruct or maintain 20 water developments for wildlife over 10 years." I recommend that this objective be changed to "every year for 10 years". As written the objective would only cover approximately 1% of the wildlife water developments per year. Given the poor condition and the maintenance needs on the Forest a more realistic objective which would better meet public expectations is 10% of the existing structures per year. This has been a major issue for the New Mexico Habitat Stamp program and the Citizen Advisory Committee. Terrestrial Species and Habitats Standards, FW-TERSPH-S, 01 I recommend that the wording be changed to "where bighorn sheep and their occupied or potential habitat occur". The standard also needs to clearly apply Forest wide and not just on the Sacramento District. This would proactively address nature efforts to restore bighorn sheep to historic habitat in other parts of the Forest other than the Sacramento District's western escarpment. The standard recommendation from the Wild Sheep Working Group (which includes the FS nationally) is a separation distance of 9 miles. This helps to avoid the potential for either wandering domestic or wild sheep to come in contact with each other resulting in potential disease transmission. Page 75: Non-Native Species Desired Condition, FW-INVASIVE-DC, 01, I recommend the removal of the word "invasive" as all non-native species are undesired and have detrimental effects to habitats and native species. Non-Native Invasive Species Standards, FW-INVASIVE-S, 01, Add "or within 9 miles of occupied bighorn sheep range." The same reasons as stated in comment above FW-TERSPH-S, 01. Page 76: Non-Native Invasive Species Guidelines, FW-INVASIVE-G, 08, I support very strongly because of the demonstrated potential for this type of activity to spread non-native invasive species, however, without the same requirements on public use of off-road vehicles on the Forest it is essentially meaningless. Page 80-81: Fire and Fuels Guidelines, FW-Fire-G, 01-14, I strongly support all of these guidelines but strongly recommend the Forest add an additional guideline. There is no more effective single public land management tool than land ownership consolidation. This tool has been consistently ignored and overlooked for Fire and Fuels management on the National Forests. It needs to be actively discussed and integrated into any discussion of public land fire management in the planning process. Ownership consolidation can eliminate many of the barriers to effective vegetation treatments to achieve fire and fuels objectives. Page 100: Range Objectives, FW-RANGE-0, 01, I recommend stronger wording to emphasize minimizing any new range infrastructure and strive for no net gain in range infrastructure on the landscape. The significant amount and non-factional condition of range infrastructure on the Forest is unacceptable. Priority needs to be given to restoring needed existing infrastructure and removing nonfunctional unneeded structures and materials. Range Standards, FW-RANGE-S, 01, Add at end of statement, "or in historic or potential habitat". This can potentially avoid problems in the future as this species is restored to all historic habitat on the Forest and would allow for long term planning for this process. Page 107: Developed Recreation Management Approaches, 05, I suggest strongly that this be entirely removed. Given the issues with infrastructure maintenance in light of agency funding and personnel artificial infrastructure needs to be minimized as much as possible. The private sector within and adjoining the Forest is capable of providing these types of services in a manner more beneficial to local economies. Page 109: Dispersed Recreation Management Approaches, 03-04. Although I support these, these are in conflict with the current Forest Policy of routinely issuing blanket exemptions to permit holders (i.e. grazing and recreation) from the Travel Management rule. This results in barriers routinely being breached with new routes around them and new unauthorized routes being created. These internal conflicts should be addressed in the plan. Page 114: Roads, third paragraph, last two sentences. These roads are not actually closed on the ground as the majority are still routinely used by either

Forest permit holders or illegally by the public. This statement gives a false impression of the actual on the ground conditions on the Forest. Many of these so called closed roads are in better condition than open roads due to the amount of motorized vehicle use on them. Page 115: Roads Standards, FW-ROADS-S, 01, As stated in the previous two comments, the number of routine exemptions to the Travel Management Rule issued by the Forest are excessive and essentially undermine any meaningful roads management. Page 123: Lands Special Uses Guidelines. FW-LANDSGU-G, 01, I strongly support not only all new powerlines being buried except for exceptional circumstances but replacement of existing lines also require the lines to be buried on FS lands. The record from other FS. Regions clearly shows the need for this action not just for protection of forest resources but for the protection of the public due to the fire hazard this infrastructure represents. Thank you.