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Comments: First I want to thank you for your efforts and diligence in compiling and evaluating the information that is necessary for a comprehensive plan such as this. I say that as a reminder that once these plans are finalized it becomes the documents we live with. Your determination is frequently the last time in the process where resource management is the primary consideration. Therefore your decision is critical to us. We are writing primarily concerning the proposed addition of 18, 320 acres to the National Wilderness System, Appendix A Page 200 Draft Management plan and further designated as SRD52, SRD62 and SRD55. Because of the restrictive nature of wilderness designations, we are concerned for the use, productivity, and resource health on several fronts, which we feel need to be reconsidered in your evaluation. We feel the proposed terrain is unsuitable for consideration for the following reasons : The area doesn't meet the desired conditions stated on page 146 of the draft management plan. Terms like 'solitude opportunities' , "wilderness characteristics" and "current naturalness" are all subjective but still require a lot of imagination to think that is what describes the acreage in question. Also, those same desired "opportunities" and objectives of the wilderness plan already exist with the present structure and management. The area encompasses the primary and most infrastructurally-improved portions of six separate-active grazing allotments, which have operated under the same management schemes for a century now. Despite the best stewardship practices, although this has left some evidence of grazing activity, more importantly it has resulted in an accumulation of beneficial infrastructural items necessary for a successful efficient operation. That infrastructure is a positive thing, not a negative one, and it impacts wildlife just as it impacts domestic livestock. The designated terrain consists of multiple separate lands, not standalone parcels. The designated lands are integral to and part of larger grazing allotments which likely will dysfunction or at least function poorly as grazing patterns and rotation, programs cease to properly function. The redesignation will be highly detrimental to all the surrounding region and its residents. The identified parcels are dependent on adjacent private and BLM land parcels for water supplied via miles of pipeline to storage facilities within the separate parcels. Any change within the designated terrain that would impede the constant, essential maintenance of these facilities, which would by definition put this critical water supply in jeopardy for all living creatures -within and adjacent to the area. The result would reduce greatly the wildlife population in the entire area, so a "hands off" approach defies reason from an objective management assessment. Evidence of historical human activity is not limited to ranching_ The area has evidence of previous petroleum exploration, mining dating back more than a century, hunting trails and roads, water diversion and erosion control structures and goat pens dating back to 1900. Private and public financial investment. The above mentioned functional infrastructure represents a century of investment put in place to assure the productivity and resource function. of the area. This countless financial investment represents private, NRCS, and USFS. To my knowledge all the wells were drilled with private investment. Many of the other items were cost share items and currently under contract with NRCS for continued function and maintenance. There are high visibility structures throughout the area. Two of these are commonly referred to by hunters as landmarks they orient themselves by because of their visibility from a distance. These landmarks save lives by their continued visibility[bdquo] in addition to their primary functions fulfilled by their ongoing existence. Cherry Stem roads. The entire area is laced with two-rut roads, although it was part of one of the Lincoln National Forest's first attempts at road closure. The Forest SCMCO has continually failed at effectively limiting access by the attempted closures. These roads are in existence today and constantly used by the hunting public regardless of signage and mapping designations. The recreationalists refuse to cease using the roads. They have been proven to be uncontrolled and uncontrollable thus far. Additionally, the pre-existence of these roads is counter to the format for the land being designated wilderness in the first place. Boundary is a public road. The two and one half miles of Mule Canyon mad considered as the Western boundary of SRD52 is the heaviest hunted and camped on location in NMDGF Unit 34. The area is impacted by non native species. The entire area is currently impacted by numerous non-native species, The recovery of native and at-risk species within the impacted area will be impossible with a more restrictive approach to species management evident in other wilderness designations. The more evident non-native species now predominant

are elk, feral horses, Barbary sheep, feral hogs, invasive non-native plant encroachment, brush encroachment, and insect and disease infestations. Adjacent to and impacting private lands and Wildland-Urban Interface. Any "hands off , let nature take its course" on these lands would put adjacent lands and properties all the more in jeopardy of catastrophic fire. A significant case in point is the "Little Bear fire" at nearby Ruidoso a few years ago as a recent example. Increase the growing western states trend toward subdivision and loss of all the desired conditions stated on page 146 of the draft management plan. The loss of efficient resource use invariably forces business decisions that ultimately work against the few "current naturalness", "solitude opportunities", and "wildland characteristics" remaining. Turning this into a wilderness area will force existing businesses out, precipitate relocation of many families, and usher in big-money entrepreneurs who will subdivide the adjacent lands and develop predatory recreational lodges and "improvements", all contrary to the intended effects of the wilderness designation. It will have unleashed a toxic whiplash effect. Accordingly, our belief is that, along with all the other negative results, the breaking up of the landscape and its devastating, far-reaching impact on the entire region must be incorporated into the proposed plan before the Forest Service proceeds with any change of designation.