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First name: Thomas

Last name: Shelley

Organization: Grant Soil and Water Conservation District

Title: Member Board of Supervisors

Comments: Attn: Objection Reviewing Officer September 22, 2024

USDA-Forest Service Southwestern Region

333 Broadway Blvd SE

Albuquerque, NM 87102

RE: Thomas L Shelley and Grant Soil & Water Conservation District Submission of Objection: Gila National Forest Draft Revised Land Management Plan and Southwestern Regional Forester's list of species of conservation concern for the Gila National Forest

Dear Objection Reviewing Officer:

We appreciate the opportunity to file objections on the referenced documents that were public noticed on July 30, 2024. I have personally submitted formal comments on the documents in the past and so did the Grant Soil and Water Conservation District (GSWCD, for which I am now one the Supervisors of the Board). I am serving as the lead objector and filing the enclosed objections on behalf of GSWCD as authorized in a board meeting on Monday, September 16, 2024 and received input and direction from the board.

Name of Plan Being Objected To with Name and Title of Responsible Officials:

Gila National Forest Land Management Plan (Responsible Official - Camille Howes, Forest Supervisor)

Southwestern Regional Forester's list of species of conservation concern for the Gila National Forest

(Responsible Official - Michiko J. Martin, Regional Forester)

The specific Objections are listed below with recommendations to abate the objections.

1. List of Species of Conservation Concern: We object to the Regional Forester's decision to add the Pinyon Jay to the list of species of conservation concern for the Gila National Forest and we object to the list of threats that specifically include "removal of trees to accomplish other management priorities and continued grazing pressure that reduces habitat." - pages 1 and 4 of the published list. The rationale of the objection is that it is premature to add this species to the list with only two years (and those being very recent) of systematic survey on the Gila National Forest. It is also harmful to our mission and objectives to list grazing and removal of trees as threats to the species when neither is proven or supported. GSWCD facilitated range and farm land restoration that has involved both of these management/agriculturally beneficial activities with great success to the ecosystem and wildlife. We respectfully request that the Pinyon Jay and these harmful statements be removed from the Regional Forester's list to abate our objection.

2. Land Management Plan - Recommended Addition of 72,103 acres to Wilderness Designation page 242: We object to the plan proposal for this large recommended addition to the Wilderness. As stated in our comments as well as those submitted by the New Mexico Department of Agriculture, we object to the addition of any new wilderness area without a true economic evaluation to our industries and economic potential. The rationale is supplied in our comments and the economic impact analysis of this land management objective is entirely inadequate. The economic analyses on pages 380 through 413, do not acknowledge or attempt to quantify the negative economic effect of reducing or removing these areas from future economic agricultural and mining production. It would have been a simple exercise during the EIS to overlay current and potential future agricultural and other economic activity (such as known critical mineral deposits that have been mapped by the New Mexico Bureau of Geology and Mineral Resources) within the areas recommended so that the public could transparently evaluate and comment on the potential loss of economic activity resulting from the proposal. But this was not done. Wilderness designation sets up our County's agricultural producers for more opposition and legal and regulatory battles in the future. This is a fact and the analyses ignore this likelihood that has a real

effect on economic potential in our county. GSWCD recommends that the recommendation to add wilderness areas, like roadless areas, be removed from the plan until appropriate economic analysis has been completed. The GNF should partner with GSWCD, NMDA, NM Bureau of Geology and Mineral Resources and other parties skilled at evaluating economic potential in a thorough economic impact analysis.

3.Land Management Plan - Wild and Scenic Rivers System - Identification as eligible for inclusion - 16 rivers (24 segments totaling 224.11 miles) Page 252 - We object to the identification of these significant stream/river segments as eligible and that the USDA Forest Service decided not to complete a suitability study as part of the process. This guarantees that an inadequate record will be before Congress to evaluate the economic and social impact of such a finding. Our comments have supplied the rationale; however, it is well known that even the designation of these resources as eligible will forever impact the hard-working agricultural families and our local economy. Therefore the Final EIS social and economic study is inadequate also in this regard. Litigation over repair of existing water and community infrastructure as well as all kinds of permitting is all but guaranteed by this action and the USDA Forest Service has avoided the necessary assessments to consider all of this through a proper suitability assessment. We respectfully request that this eligibility finding be modified to recommend that a suitability study be completed before any Congressional action on this recommendation.

Thank you for your time and consideration of our objections. We will make time at your convenience to discuss them.

Sincerely,

Thomas L Shelley
Member Board of Supervisors, Grant Soil and Water Conservation District