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Comments: COMMENTS ON CIBOLA NF RECOMMENDED WILDERNESS

Upon looking at the second round of wilderness polygons and the summaries of why certain polygons that had qualified for consideration in the first round had been deleted for the second round, it is noticeable that several polygons had been eliminated because they had dropped below the requisite 5,000 acres after range improvements were evaluated. This is of great concern because the evidence of grazing that is allowed on public lands and in wilderness should not disqualify an otherwise roadless area from being considered for wilderness recommendation. There are several methods that could be used by the permittees and the range managers to lessen the impact on the visual landscape so that these most important areas for watershed health and wildlife corridors could still provide opportunities for solitude and/or an area that is not noticeably impacted by human interventions. These could include using less noticeable fencing - painting the fence posts and stock tanks to match the surrounding vegetation, and moving certain fence lines that mark boundaries of grazing areas so that they are no longer cutting through meadows and areas with less vegetative cover. This could be done over time, so that these areas could still be managed as having wilderness character, and it should not burden permittees with heavy costs, especially considering the low price permittees pay per AUM as compared to grazing costs on private land. When the forest service is writing a plan for the next 10-30 years, this is not too much to ask of the permittees. Also, if a permittee has the opportunity and desire to retire an allotment, it should be written into the plan revision process to allow them to sell their permits to agencies and NGO's that could then retire the allotments permanently, or at least for 30 years, which is what has been proposed by some ranching advocates as an extension for these permits.

Certain polygons being considered for wilderness were dropped off in the 2015 second round of the Cibola NF plan revision process because there was evidence of human intervention due to timber harvests leaving taller stumps and also to landscape restoration - thinning and controlled burning. Some polygons, especially on the western edge of the San Mateo Mountains, were reduced because there were visible stumps that were old, but more than a foot high. In the past, when loggers took trees with chainsaws and/or crosscut saws, they would leave a visible stump between 2 and 4 feet high. Many of these stumps are quite old - 40 to 50 years, and are rotting away, albeit quite slowly in New Mexico's dry climate. These stumps should not eliminate an area from consideration for wilderness, if it meets other requirements in terms of being roadless, of having sufficient acreage, and of providing outstanding opportunities for solitude and unique and beautiful vistas. Land with taller stumps could be considered evidence of past historic and cultural uses, similar to old deteriorated mining sites, etc. If this land was protected as wilderness or recommended wilderness, in another 50 years, these stumps would probably no longer exist, and would not impair the wilderness experience for human users. It certainly doesn't impair the experience of native plants and wild or endangered animals who will be the most prevalent users of these areas, and have the greatest need for untrammelled habitat. An exception might be an area in the Gallinas Mountains that was burned, and then loggers were allowed to take the standing dead trees. This would probably be considered very substantially noticeable, and I could understand not including that area. Also, if an area has evidence of thinning, in terms of relatively straight lines of thinned areas and/or changes in canopy cover that are visible from the air, this should not eliminate an area from wilderness consideration. The reasoning is that if the landscape is being restored to what best science says is a prehistoric condition, that should not eliminate it from wilderness consideration; in fact, that is a strong argument for including it. If the forest had been allowed to manage itself in terms of fire natural fire regime and no grazing, it would most likely look like what a landscape restoration is aiming for. I am not saying that areas that were clearcut in the bad old days and then were reseeded to create a ponderosa plantation are qualified for wilderness, but some restoration and controlled burning should not eliminate an area from consideration. Matchstick forests are not what the scientific standard for wilderness character should be, in terms of naturalness.

There is a polygon that should be designated as a Special Management Area, and that is the Little Water Canyon area (D2_5K2) in the Zuni Mountains in the Mt. Taylor Ranger District. The area has unique features, in that it has very large trees, lush undergrowth, and a significant wetlands, including what seems to be a small perennial stream, at least in the higher reaches of the canyon. The trees include large ponderosas, 30+ dbh Douglas firs, 40+ dbh Blue Spruce and very large aspens, as well as an extensive grove of large pin oaks. (Gamble Oaks? - I am not sure of their identification. but there are reports of their existence in the plan revision paperwork from the 1980's.) This area, unlike other parts of the Zuni Mountains, has high scenic and botanical value, and shows very little evidence of human disturbance, other than a rough two-track road that is mostly inaccessible from the southern part of the zuni Mountains. Little Water Canyon and its confines should serve as a reference area for the restoration of other riparian areas in the Zuni Mountains. It would make sense to expand the polygon to include north over Oso Ridge, west to Water Canyon and east to Oso Bonito Canyon, which also had a flowing spring up until two years ago, according to local residents. It is one of the very few springs that still run in the Zuni Mountains, and deserves protection. This is another area where the permittee for the grazing allotment should be allowed to sell his permit for the purpose of retiring it, if funding can be found to do so. There was no evidence of grazing going on in the summer of 2015 and in October of 2014, when my husband and I were both in Little Water Canyon. There should be comments submitted by a botanist that document specific species of unique and diverse vegetation that exist in the canyon, but I don't have the botanical knowledge to be that specific.

In the Magdalena RD, my group and I in May of 2014 hiked and photographed four areas deserving of wilderness protection. These included two areas in the San Mateos and two areas in the Magdalenas. The first area that was documented as having scenic value, solitude, and little to no substantial evidence of human intervention was the Panther Canyon area (D3_5K16). The group began hiking east from the Hughes Mill campground, attempting to follow the trail into Panther Canyon, but the trail was very poorly marked - a few tree blazes - to unmarked. They had to use topo maps and GPS coordinates to navigate to Panther Canyon. They saw much evidence of wildlife, including many piles of bear scat, but almost no evidence of human modifications except for the faint traces of a trail. There were many scenic areas in Panther Canyon. The group did not encounter any other humans, so the opportunities for solitude are excellent, and the experience is definitely primitive. The second group of us hiked from the Grassy Meadow Lookout in the San Mateos south along the Apache Kid trail (D3_ADJ8) on the same day. The trail itself was difficult to find from the trailhead signage, but once we did locate it below a fence line, it was fairly easy to distinguish as far as we went, which was a couple of miles. There were several downed trees across the first couple of miles of the trail, and the trail markers once you were on the trail were either down or barely readable. There were many scenic overlooks along the trail, and no evidence of other recent users. It is a wild and unmodified area, and certainly deserving of preservation in its current state. Again, the primitive state and opportunities for solitude were outstanding. We saw no other users on that day. The next day, the first group hiked down the Ryan Hill Trail (D3_Lang) in the Magdalenas from a short spur off the road to the Langmuir installation. They hiked to the intersection with the South Canyon trail. There were certainly signs of mining, but none of them recent along this trail, and it had many scenic areas and overlooks. They encountered only one other hiker, who said he walked up there every week. The second group hiked west from the South Canyon trailhead (D3_5K3) in the Magdalenas off the BLM WS area. This is a beautiful little canyon with numerous piles of bear scat, but also piles and piles of cow pies. There appeared to be many more cattle in the canyon than is good for the habitat. There was no water in the stream-bed, but the scenic value was very high, and the vegetation was relatively lush considering the number of cattle that seemed to be using the area. The road to the trailhead was primitive and no other people were encountered once the group left the highway. It is obvious that there are many wild and primitive areas that are part of the roadless areas of the Magdalena RD, and they are certainly worth preserving intact, and being included on the wilderness inventory.

An additional area that has wild and scenic value is found in the far northeast section (D2_ADJ3) of the Mt. Taylor RD, on what is referred to on the topo maps I have as Chivato Mesa. While I have not been able to hike the area, I have hiked within a mile or so on a road that comes in from the north and east past Cabezon. This area is adjacent to a BLM wilderness study area and has many opportunities for solitude and a primitive

experience. There was evidence of grazing improvements on the BLM land, and I would assume there might be some on top of the mesa on the FS land, also, but that should not preclude it from consideration as inventoried wilderness. The roads coming in from the west are extremely difficult to navigate, even in the best of weather, according to hunters I have visited with who drove them in the fall of 2014. Most of the area is roadless, isolated, and has many opportunities for solitude, in addition to having numerous scenic overlooks. I would like to see this remain in the wilderness inventory for the Mt. Taylor RD's forest plan.

I thank the Forest Service and the Landscape teams for consideration of my comments.