

Revising the Cibola National Forest Land Management Plan – Preliminary Need-to-Change the Existing 1985 Cibola Forest Plan

The conditions, trends, and risks to sustainability reported by the draft *2014 Cibola Forest Assessment Report* for the resources, goods, and services provided by the Cibola will be used in informing the needs-for-change to the *1985 Cibola Forest Plan*. Needs-for-change statements are to be developed collaboratively, both internally and externally, by comparing conclusions on conditions, trends, and risks from the respective topic areas of the assessment, with the plan direction of the 1985 Cibola Forest Plan. The development of needs-for-change statements does not involve wordsmithing of specific plan direction of the 1985 plan; rather, these statements paint a picture of strategic changes necessary to address issues identified in the assessment. The overarching question to be answered in developing needs-for-change statements is “*what strategic current plan direction needs to be revised (added, modified, deleted) to address the conditions, trends, and risks evident from the assessment analyses?*”

Sample needs-for-change have been developed by the Cibola National Forest planning and extended teams, reviewed by line officers, and are now presented to Cibola National Forest users and interested citizens through various media, including most importantly, collaborative work sessions, to be held near each ranger district. At these work sessions, input will be gathered to inform needs-for-change statements that will be ultimately be published in a *Federal Register Notice of Intent* announcement. This announcement conveys that the Cibola will develop a revised forest plan based on identified needs-for-change, and will develop plan alternatives and analyze their respective effects on the human environment. It is hoped that relationships with and among stakeholders will be established or strengthened during the work sessions, information will be shared, and self-convened, self-directed groups will have organized around key issues and bring their ideas and suggestions to the sessions.

These draft needs for change have been updated to reflect contributions from the first and second rounds of collaborative work sessions (June 9-12; June 23-26 and July 8) as well as input received via the Plan Revision website and the Plan Revision email address. Statements that follow that are written in normal font were generated by resource specialists of the Cibola National Forest. Statements in italics are those captured from the public, tribes, non-governmental organizations, and federal, state, and local government entities.

Throughout the Plan

There is a fundamental need for the revised plan to address how forest management in all resource areas should be prioritized given varying levels of money and personnel likely to be available over the course of the planning cycle. Plans have historically overpromised what could be accomplished, with limited regard for fiscal realities. Yet there is also a desire to keep options open in case unexpected funds and/or capacity become available.

There is a need to reconsider the overall management area scheme used in the 1985 Plan.

- The number, arrangement, boundaries of, and plan direction for the management areas need to be modified to reduce complexity and increase flexibility for restoration and creation of wildlife habitat.

- Changed criteria for management area delineations are needed, including how species indicators are associated with management areas.
- Management area direction needs to reflect realistic expectations regarding the amount of work that can be achieved within a planning cycle.

There is a need for the revised plan to replace tactical, prescriptive language of the 1985 Plan with strategic language, i.e., defining desired conditions for a resource, good, or service, and then identifying quantifiable objectives and project design guidelines and standards to achieve the desired conditions.

There is a need to better recognize and potentially enhance the role of the Cibola National Forest in supporting local economies through both commodity production, including timber and other multiple-use products, and the service-based economy that includes recreation and tourism.

NEW!!

[Replace above paragraph with the following] There is a need to enhance the role of the Cibola National Forest in supporting local economies.... Etc.

There is a need to include plan direction regarding potential climate change impacts such as increases in drought, wind, storm events, flooding, and other extreme weather.

There is a need to incorporate opportunities for working across boundaries to manage landscapes with adjacent land managers such as state, tribal, and federal partners and other land management entities.

There is a need to remove components from the 1985 Cibola Forest Plan that are redundant with existing Forest Service Manual (FSM) and Handbook (FSH) direction. Manual and Handbook direction will be incorporated in the revised plan by specific reference only.

NEW!!

There is a need to investigate and work to restore rights-of-way to increase and/or restore historical and new public access routes to National Forest lands.

There is a need to share the implementation of Plan activities/project with the public to provide transparency and accountability. For example-an interactive map showing all planned/in progress/completed fire/habitat restoration/etc. projects. Including the Plan objective the project satisfies. Data should be available for download.

There is a need to include climate change as a topic in the Forest Plan. Reference climate change in section, like in water, W/L [wildlife], habitat, recreation, range and grazing, special uses. Elaborate on sections.

There is a need for a unified “plan”! State, Fed, local input to be involved!

There is a need for more law enforcement to enforce existing regulations and promote public health and safety.

There is a need to change the plan to accommodate “new” users of the Forest.

There is a need to develop a framework to facilitate partnerships with stakeholders and a share

vision. These partnerships could support management & maintenance of the Cibola.

There is a need for the revised plan to provide a focus on youth to the land and to nature.

There [is a need for] a framework to direct and facilitate volunteer work in the forest.

There is a need for the revised plan to give equal or greater weight to the intrinsic values of forest lands when also considering multiple uses such as recreation, extraction, or other economic utility.

There is a need for the revised plan to consider land use plans developed by Soil and Water Conservation Districts and for the Cibola to engage these groups.

Change above to read: There is a need for the revised plan to consider land use plans developed by Soil and Water Conservation Districts and land grant management plans and for the Cibola to engage these groups.

There is a need for the revised plan to focus on land health sustainability when considering any use of the forest. Current policy/procedure seems prescriptive as opposed to allowing different land management options based on how that management improves the land base. True forest sustainability will come from partnerships of private/public management that provides livelihood and improves the nature resources.

There is a need to update the plan to establish an active program of resource monitoring and adaptive management.

There is a need for the revised plan to manage forest resources using the best available science regarding the current and likely impacts associated with climate change and drought.

There is a need to establish data standards that match those of other agencies.

There is a need to abandon unattainable goals and focus on those that are attainable.

There is a need to focus on maximizing biodiversity rather than eradication of all invasive species (esp. those that are extremely entrenched) e.g. salt cedar, beetles.

There is a need to change the plan to accommodate “new” users of the Forest.

There is a need to develop a framework to facilitate partnerships with stakeholders and a shared vision. These partnerships could support management & maintenance of the Cibola.

There is a need for the revised plan to provide a reconnecting focus on youth to the land to nature.

There needs to be a framework to direct and facilitate volunteer work in the forest.

There is a need to collect, analyze, and distribute survey and other monitoring data on a more consistent and reliable basis for all forest health measurements. This should also include a plan on how such collection, analyses, and distributions will take place and how often.

There is a need for easier, quicker, more accurate communication from the public to the FS,

perhaps a hotline to report violations (trespassing, poaching, garbage-dumping).

There is a need for any changes to the management plan to be based upon fact and supported by scientific data.

There is a need for the revised plan to manage forest resources using the best available science, add { that {who's} science has been decided and agreed upon on by all Stake holders, including permit owners, in a Collaborative effort} regarding the current and likely impacts associated with climate change and drought.

There is a need to incorporate opportunities for working across boundaries to manage landscapes, with adjacent land managers such as state, tribal, and federal partners and other land management entities { add including Universities, and permit owners, in a collaborative effort}

There is a need to have in place a non-partisan arbitration set up, to remedy disputes over any negative action, be it USFS, or permittees, or the general Public, before any action is taken on forest land.

There is a definite need to further to define the word Landscape that is used throughout this process, as it is too broad a term with different meanings to different people. Also the need to define Best Science, as, again, many people's ideas of best Science differentiate as much as day and night.

There is a need for the revised plan to support the economic needs of the local community, which includes fostering and permitting the development of economic resources in and around the Forest.

There is a need for the revised plan to leave Mt. Taylor and the Zuni Mtns. alone, nothing needs to be changed.

Need for Change: Ecological/Ecosystems

Restoring Ecosystems and Habitats

There is a need for the revised plan to define the desired conditions for achieving sustainability and minimizing risks to the Cibola's varied vegetation types and their structure and composition (including snags and downed woody material), and objectives, standards, and guidelines for moving toward the achievement of those desired conditions.

There is a need for the revised plan to provide direction for a fire strategy that allows flexibility in achieving restoration and maintenance of ecosystems while addressing public safety and health concerns.

There is a need for the revised plan to provide direction to promote the achievement and maintenance of satisfactory soil condition, including a decrease in the amount of exposed soil surface, and in areas where deficient, an increase in downed woody material. Priority should be given to Ecological Response Units (ERUs – vegetation types) whose soils have a relatively high proportion in unsatisfactory condition, and of these, especially those ERUs with a preponderance of their context scale (Cibola plan area and surrounding landscape) acreage on the Cibola.

There is a need for the revised plan to include direction to address connectivity corridors and buffer zones for some rare habitats with adjacent or neighboring federal, state, tribal, or private ownerships.

There is a need to provide plan direction to better control the introduction and spread of non-native invasive species on the Cibola, including direction that would minimize the spread of non-native plants that may increase as a result of management activities.

There is a need in the revised plan to update plan direction for prescribed fire management by: incorporating direction that directs an integrated resource approach to prescribed fire activities, and; including direction that allows flexibility for restoration and maintenance of ecosystems while addressing public safety and health concerns.

NEW!!

There is a need for the revised plan to address fuel management with an outcome where discontinuous fuel loads would minimize potential for uncharacteristic and catastrophic wildfire.

There is a need for change in the revised plan to address invasive species seed sources coming from recreational activities that could spread invasives across the landscape.

There is a need for change in the revised plan to address preventive measures against forest insects and disease.

Integrate the following two statements into one:

There is a need in the revised plan to update plan direction for prescribed fire management by: incorporating direction that directs an integrated resource approach to prescribed fire activities and including direction that allows flexibility for restoration and maintenance of ecosystems while addressing public safety and health concerns.

With:

There is a need for the revised plan to provide direction for a fire strategy that allows flexibility in achieving restoration and maintenance of ecosystems while addressing public safety and health concerns.

There is a need to recognize that climate change will alter existing plant and wildlife regimes and that all management action must be geared to increasing the stability, resilience, and sustainability of ecosystems in light of these changes which will be ongoing and accelerating.

There is a need to acknowledge the economic value of ecosystem services that the forest provides naturally without management such as (but not limited to) water storage and carbon sequestration and to include this side of the balance sheet when considering commodity production and forest product removal in financial terms.

There is a need to apply the precautionary principle to uses of the Forest: when an activity potentially threatened the sustainability, integrity and/or resilience of ecosystems, the burden of proof lies with the proponent of the activity to show it is not harmful and not the public to show otherwise. Lack of scientific certainty is not a reason to postpone measure to prevent

environmental degradation. Lack of scientific data is not evidence that harm is lacking.

There is a need to recognize that uses of the forest must be limitable and revocable to protect the sustainability and resiliency of watersheds, plant communities, wildlife, and soils.

There is a need to incorporate opportunities for working across boundaries to manage landscapes with adjacent land managers such as state and federal partners and other land management entities. For example, opportunities may exist to conserve roadless areas and connect habitat that spans across BLM lands in the Rio Puerco Field Office and into the Mt. Taylor Ranger District. Additional opportunities exist between the Socorro Field Office and the Magdalena Ranger District.

There is a need to restore landscape connectivity by connecting unroaded areas and by reducing fragmentation.

There is a need to include plan direction to address transportation infrastructure, including reclaiming unneeded routes. (See below in infrastructure.)

There is a need to manage for sustainable ecosystems-not a rigid “reference” veg type to allow for an adaptive response to climate change. For example-an area with a “reference condition” of ponderosa pine might (with climate change) now better support PJ.

There is a need for the revised plan to provide direction to incorporate TEUI into vegetation, range, and wildlife management.

There is a need to restore historically open grasslands. Thinning [is] a must.

There is a need to consider & factor climate change into ecosystems & habitats. All aspects of a new management plan should [be viewed through the] lens of climate change.

There is a need for the revised plan to implement additional monitoring surveys to find invasive plant species that may be detrimental to the persistence of the vegetative communities found on the Cibola and then implement actions to eliminate them.

There is a need for the revised plan to acknowledge synergistic effects among stressors (e.g. fire suppression, insects, and pathogens) in order to achieve positive management outcomes.

There is a need for the revised plan to emphasize the importance of active-stand management to the future direction of the forest. This will reduce fuel loads, reduce severe fire risk, and improve watershed health.

There is a need to update the plan to acknowledge the important role of fire in sustaining the health of Cibola National Forest ecosystems.

There is a need to update plan direction to prioritize where vegetation treatment is most needed for community protection, where ecological restoration is most appropriate, and where wildfire is most likely to result in beneficial effects.

There is a need for the revised plan to acknowledge emerging woodland science, particularly differences in disturbance regimes between pinon-juniper woodlands and ponderosa pine

woodlands.

There is a need to recognize that vegetation and fire management activities can provide economic opportunities through the sale of timber and vegetation removed to enterprises such as bio-fuels manufacturing/power facilities.

There is a need to the revised plan to address excess fuels and the appropriate use of prescribed fire in the Bernalillo Watershed RNA and other communities in order to protect drinking water and other watershed features. 17 natural springs in [the] area.

[There is a] need for common sense in decisions about prescribed burns considering weather forecasts.

[There is a need for the revised plan to] address the need for a “Common Sense Check” when prescribed burns are carried out by giving some weight to the weather forecast.

There is a need to analyze other uses for an area and infrastructure after a catastrophic event.

There is a need to incorporate new technologies in the management of the forest to improve public access, cost, productivity, etc.

[There is a need to] coordinate with FS neighbors to treat undesirable species (including native species) to achieve desired conditions.

There is a need in the revised plan to manage recreation uses near/adjacent to water resource features.

There is a need in the revised plan to provide direction for ensuring that “preferential” consideration of riparian dependent resources occurs.

There is a need to acknowledge and continue the benefits of properly managed land disturbance activities, such as grazing and fire, to grassland habitats including species richness, plant species diversity (Belsky 1992, Collins 1987, Fuglendorf et al 2006) and forage plant productivity (Holechek et al., 2006).

There is a need to more robustly address the invasive species problems on the Cibola. This should be done by creating a plan to continue working with local, state, and other federal agencies to control and eradicate problem species.

There is a need to specifically create an eradication plan to control and eradicate feral hogs (and other invasive animal species) on USFS lands in collaboration with other local, state, and federal agencies.

There is a need to analyze and plan for ecosystem and habitat restoration in a more synergistic manner. For instance, stand density, fire, plant diseases, and other ecological stressors should be analyzed as a whole in contributing or detracting from forest health-not as independent stressors (Parker et al, 2006).

There is a need for better communication (such as radios on the same frequency) between local firefighters and other first responders and the USFS. Like State fire.

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There is a need to analyze and plan for ecosystem and habitat restoration in a more synergistic manner. For instance, stand density, fire, plant diseases, and other ecological stressors should be analyzed as a whole in contributing or detracting from forest health – not as independent stressors.

There is a need for the revised plan to address fuel accumulations in the WUI and take a more active management role in these areas.

There is a need for the Cibola to play a more active role in the management of the area near Corona because it has become overstocked resulting in diminished watershed, increased possibility of wildfire, reduced grazing resources, and threatened wildlife habitat.

Water

There is a need for the revised plan to provide plan components to maintain or restore ecological integrity of riparian areas and other water resources features and to establish riparian management zones and around all lakes, perennial and intermittent streams, and open water wetlands, giving special attention to approximately 100 feet from the edges of all perennial streams and lakes.

There is a need in the revised plan to include direction for improving aquatic passage in streams where it is compromised. Direction should be included for restoring and expanding the range of native aquatic species and connectivity of fragmented populations.

On the Cibola, forty-six 12-digit HUC watersheds are rated at risk and one is impaired. There is a need for the revised plan to identify priority watersheds for restoration and focus work in these areas and to utilize the watershed approach when assessing effects to water resource features.

There is a need for plan direction to improve and standardize the process used to manage water rights. Currently, the Forest's approach to water rights is not consistent.

There is a need for the revised plan to provide plan direction for public water supplies and integration with special uses. Direction should consider current and anticipated uses and associated ecological effects.

There is a need for the revised plan to provide direction on the management of the interconnection of groundwater flows with springs, wetlands, riparian areas, and perennial waters to provide favorable conditions of flow for the Forest and maintain the ecosystem characteristics

of water dependent resources. For example, many springs are currently developed without consideration of associated groundwater dependent resources. As a result, ecosystems associated with these features have been degraded or lost.

There is a need for the revised plan to include management direction regarding plan area municipal watersheds and groundwater; considering current and anticipated uses, and the anticipated ecological impacts.

NEW!!

There is a need to make restoration of riparian areas a priority because so many species of wildlife depend on them as does the proper functioning of watersheds. Water management will become ever more important as climate instability makes severe drought, extreme flooding events and extreme temperatures more common.

There is a need to review and possibly improve “human” access to potable water on forest lands. Public owned wells with potable water along trails and in areas of high O activity should be evaluated and modified to provide a potable water source for humans as well as livestock use.

[There is a need to] see improvement of existing springs & H2O sources for wildlife & recreational users.

There is a need for the revised plan to consider the economic value of all waters on and off the forest when multiple uses occur.

There is a need for the revised plan to consider the upstream & downstream connection and impact of water uses that occur on the forest.

There is a need for the revised plan to consider the cultural and social values of waters on the forest.

[There is a need to] revise to develop more water resources across the Cibola Forest.

[There is a need to] enhance natural springs.

There is a need for the revised plan to identify springs & water resource features of importance to tribes and prioritize protection and restoration. Focus should be on springs and other water sources that are contributing to stream flows, riparian and larger landscape benefits. Make large readable map of springs for tribal review so they can pinpoint the springs important to them.

There is a need for the Forest plan to provide direction for restoring cottonwoods, riparian areas.

There is a need for the revised plan to provide direction to restore stream channel morphology and hydrology to allow for reestablishment of desired vegetation.

There is a need in the revised plan to manage recreation uses near/adjacent to water resource features.

There is a need in the revised plan to provide direction for ensuring that “preferential”

consideration of riparian dependent resources occurs.

[There is a need to] establish a method to protect riparian areas to protect flora & fauna around natural springs.

[There is a need to] use guzzlers to provide water outside of riparian areas. Guzzlers can be used to provide water for both wildlife & domestic stock by fencing part of the areas and also providing an outside tank for domestic stock.

There is a need to consider riparian values as a priority over grazing right as best science indicates, especially with consideration to climate change.

There is a need for the revised plan to develop more projects to improve, conserve, and protect riparian areas on the Cibola NF.

There is a need for the revised plan to place more emphasis and priority on watershed health and functionality.

There is a need for the revised plan to better protect riparian and aquatic habitat and vegetation.

There is a need to incorporate the new groundwater directives in the new forest plan.

There is a need to incorporate the BMP monitoring protocol into the new forest plan.

[There is a need to] fence off & monitor without additional plantings. Or (?) plant climax specie first. Only plant according to soil site potential.

[There is a need to] measure morphology first, do not restructure before monitoring—indicates channel trend.

[There is] a need to cover the impacts of mine dewatering upon forest land.

[There is] a need to acknowledge water as a public good, public trust, public welfare.

[There is] a need to not privatize water on forest land.

[There is] a need to protect and preserve watersheds.

[There is] a need for doing water testing and reporting and sharing water quality data.

There is a need to plan for watershed health as it relates to downstream surface water users, especially when planning for forest fire mitigation and recovery efforts.

There is a need to clearly explain the issue of surface and ground water rights on National Forest System lands. Under New Mexico's prior appropriation system, water rights require a permit holder to apply water rights to the intended beneficial use. In the context of livestock watering rights, federal agencies are unable to comply with this requirement due to the fact that grazing permit holders, not the federal agency, are owners of the livestock on federal grazing allotments.

There is a need to recognize the importance of grazing permit holders' water development

projects as a benefit to wildlife for water access. Hunting and wildlife viewing in the Cibola would not be as significant were it not for privately developed water rights and infrastructure.

[There is a] need to clean springs on Manzano Unit]

There is a need to plan for watershed health as it relates to downstream surface water users, especially when planning for forest fire mitigation and recovery efforts.

There is a need to clearly explain the issue of surface and ground water rights on National Forest System lands. Under New Mexico's prior appropriation system, water rights require a permit holder to apply water rights to the intended beneficial use. In the context of livestock watering rights, federal agencies are unable to comply with this requirement due to the fact that grazing permit holders, not the federal agency, are owners of the livestock on federal grazing allotments.

There is a need to work with local cattle leases and others on Forest Service lands to help develop and maintain water sources (detailed list provided by commenter) so that they remain a viable water source for wildlife and domestic animals.

There is a need for continued assistance in maintaining the pond built by the Village of Corona and the Cibola because it is a strategic water source for wildfire fighting capability and recreational uses for the Village.

There is a need for active watershed management in Red Cloud Canyon in order to safeguard the Village of Corona's primary water source.

There is a need to enhance and expand existing springs and explore alternative water sources.

There is a need to better distribute existing waters and springs, thru solar pumps, or any other feasible means, to establish multiple watering points, to help protect stream banks, riparian areas, and to further distribute wildlife, and livestock, once again to be a collaborative effort.

There is a need for long term advance collaborative planning, between permit holders, and all parties, WELL BEFORE any action is taken on riparian areas, and water sources.

I would like to see spring restoration. Due to drought conditions and low snow pack some springs are not flowing like they could. Part of this is they are silted in. I would like to see some work done in this area.

There is a need for the revised plan to recognize existing water rights.

Air

There is a need to update plan direction to include elements that ensure that air quality conditions remain in attainment, particularly for criteria pollutants that appear to be in decline, such as particulate matter (e.g., blowing dust).

There is a need for the revised plan to include monitoring elements that provide more reliable information regarding critical loads of atmospheric pollutants.

Wildlife Habitat

There is a need for forest plan components to be developed to maintain and/or restore the ecological conditions necessary to contribute to the recovery of federally listed species, to conserve proposed and candidate species, and to maintain a viable population of each of the species of conservation concern within the plan area.

If ecosystem-targeted plan components are insufficient to provide for the recovery of federally-listed species, the conservation of proposed and candidate species, or the maintenance of viable populations of species of conservation concern, there is a need for the revised plan to include species-specific plan components to provide such ecological conditions in the plan area.

There is a need for management direction in the revised plan to further develop hunting, fishing, and wildlife watching opportunities in the plan area that will provide revenue to the local economies.

NEW!!

There is a need for change to update the plan concerning wildlife escape ramps and covers on water holding tanks. All new livestock and other water developments will provide for wildlife escape. All new and existing metal or plastic water holding tanks need to be covered and any access portals need to be bolted and/or locked for protection for wildlife and to provide human confined space safety. All existing livestock and other water developments need to be retro-fitted to provide escape ramps.

There is a need for change to provide clear direction on the size of buffers for raptors by species and the type of activities allowed or not allowed in the buffer during the breeding and non-breeding season. All species of raptors and owls known to nest on the Cibola Mountain District should have a buffer or at least protection of the nest tree defined. The size of the buffer should be based on current literature. The buffer size should be described in measurements more acceptable used by the public and biologists such as feet and meters.

NEW!!

Because hunting infrastructure is already significantly developed, there is a need to prioritize the development of wildlife watching as an economic opportunity. This activity can occur year round and is not restricted to specific seasons. And because wildlife watching does not depend on limited license availability from NM Game and Fish and encompasses a much broader diversity of wildlife species, there is the stability of the potential for year round income. And because the ranks of wildlife watchers and photographers is growing, so is the potential demand for the support services such as guiding, lodging and food that, like hunting, this activity could foster.

There is a need for the Forest Service to more actively consult and offer guidance to NMDGF regarding wildlife management and the conservation of both game and non-game species.

There is a need for the revised plan to address closer coordination with the New Mexico Department of Game and Fish, the U.S. Fish and Wildlife Service, and adjacent tribal and other wildlife agencies on wildlife management issues in the plan area.

There is a need for the revised plan to address areas used by wildlife, including but not limited to corridors, calving/breeding areas, and winter range in the plan area.

There is a need to consider connectivity corridors and buffer zones for wildlife to provide for species movement across the landscape.

There is a need to include plan direction regarding potential climate change impacts such as increases in drought and species movement.

[There is a need to] identify potential species of concern that the forest may not know about, e.g. plants used for medicinal purposes.

There is a need to consider wildlife migration corridors when deciding where to place fences. Where a fence is absolutely necessary, then the best available design that allows for wildlife movement and minimized damage shall be used.

There is a need for the revised plan to take seasonal wildlife habitat use (for example: winter range vs. spring calving areas) into consideration when developing ecosystem restoration (such as timber harvest and prescribed burning) goals.

There is a need to designate these areas [above] as special zoological management areas.

There is a need for the forest plan to address direction [for] activities that congregate groups of people and protect seasonal uses of species (e.g., peregrine) and allows some flexibility.

There is a need for the revised plan to direct that timber-harvest or restoration/thinning work should not occur during the peak of the bird nesting season, specifically April 15 to August 1. Even those trees and shrubs that are not cut will be disturbed, all resulting in reduced nesting success by many neotropical migrant songbirds. Quite apart from violation of the Migratory Bird Treaty Act, this is another example where managing for desired conditions can disrupt natural ecological processes that are essential to proper ecological function. Since the period also includes the peak of the fire season, avoiding the use of mechanical equipment in treatment areas during this period reduces the likelihood of ignition at a sensitive time, helps protect soils following snowmelt, and reduces attraction of bark beetles to freshly cut woodlands.

There is a need for the revised plan to manage species habitat for connectivity between the districts of the Cibola and other state and federal public lands to facilitate wildlife movement.

There is a need for the revised plan to consider the habitat requirements of Mexican gray wolves and manage forest resources with the goal of assisting their recovery within New Mexico and on the Cibola National Forest.

There is a need for the revised plan to provide specific standards and guidelines for protection of habitat of endangered, threatened and sensitive species within the Cibola.

[There is a need to] add mule deer to [the] list of Species of Conservation Concern for the Cibola NF or as a focal species.

[There is a need for the revised plan to include] working with other groups and land ownership and interest adjacent to forest service. Cooperating with Prairie Dog Pals and Whitfield Wildlife Center-Belen.

[There is a need for the revised plan to include] Valencia County which borders the west side of

Manzanos. Coordinating WILDLIFE corridors with public-private partnerships.

There is a need for wildlife to have corridors to be able to move from one area of the forest to another, especially in times of low food output from the forest.

There is a need to prohibit trapping on the Forest in the vicinity of residences and residential areas adjacent to National Forest lands, trails, campgrounds and picnic areas. Current State regulations are insufficient and the Forest Service should extend the distance in which trapping is prohibited on Forest lands—trapping should be limited to designated areas on the Forest, in cooperation with NMDGF and USDA Wildlife Services—designated areas should be marked on the ground and shown on maps.

There is a need for USFS to work with the United States Fish and Wildlife Service on the recovery of listed threatened and endangered species to ensure that users of the Cibola, such as grazing permit holders, can conduct their business synchronously with recovery program efforts.

There is a need for the revised plan to seek to enhance wildlife habitat for game and non-game species because of the importance of wildlife to the culture and economy of the Village of Corona.

There is a need to maintain the relationship with the New Mexico Department of Game and Fish, as well as with local interests, concerning harvesting of wildlife and other animals. There is also a need to continue to allow access to traditional hunting areas.

Do not protect one species and then introduce another protected species that will prey on the other.

Needs-for-Change: Multiple Uses and Human Influences

Cultural Resources

Revised plan direction needs to support evaluation of cultural resource sites after they are located, as well as sustainability of significant sites. When sites are located but not evaluated, ground disturbing activities or uses must be avoided. However, if evaluation indicates the site is not significant, activities and uses may be able to proceed unimpeded. Creative approaches are needed in light of limited capacity for evaluating sites.

The revised plan needs to provide updated direction on the stabilization and preservation of historic structures and traditional cultural properties. The revised plan should also provide direction on the role of heritage sites in economic development.

Amendment to above statement: [There is a] need to also consider the cultural values associated with economic uses (such as grazing, fuelwood cutting, etc.) in addition to non-economic uses.

There is a need for the revised plan to acknowledge and provide management direction for traditional cultural properties and sacred sites while conserving anonymity of such sites where appropriate.

There is a need for the revised plan to modify or eliminate language regarding adverse effects that is inconsistent with 1992 revisions to 36CFR 800, and that compels the Forest to develop a site-specific amendment to the forest plan to allow for adverse effects to non-archeological historic properties.

There is a need for the revised plan to develop program objectives consistent with current program management directives of the 2008 Forest Service Manual revisions.

There is a need for the revised plan to include cultural resource management direction language that is specific to the resources (particularly historic properties) found in each management area. There has been exponentially greater definition of the patterns of historic use in each management area since the 1985 plan, and management direction should be oriented relative to that knowledge. Area-specific management direction should be aligned with current National Register properties, National Historic Landmark properties, and priority heritage assets (PHAs), as well as with known and anticipated National Register eligible historic properties.

There is a need for the revised plan to consider historic and contemporary cultural uses, particularly non-economic uses, for those traditional communities not considered under Tribal Relations (i.e., traditional Hispanic and Anglo communities). In particular, non-site specific and landscape historic and contemporary uses by these communities need to be considered for each management area.

There is a need for the revised plan to include direction that addresses the alignment of heritage resources management objectives (historic properties and landscapes, sacred sites, contemporary uses) with other resource management objectives (particularly but not limited to ecosystem restoration). Other resource management objectives often benefit the sustainable management of cultural resources and uses (and sometimes vice versa), but project design to maximize all benefits could be improved upon.

NEW!!

There is a need for the revised plan content to address ethnographic studies that would help identify tribal sensitive areas (e.g., springs) and species of cultural concern, information which would inform the Cibola NF when doing project and management activities.

There is a need to ensure cultural and archeological resources are conserved. There is a need to update plan direction to ensure multiple-uses do not degrade cultural resources.

There is a need for the plan to emphasize the importance of proactively inventorying & documenting significant archaeological resources that are in high fire risk areas.

Amend statement: add archaeological resources to statement about stabilization and preservation of historic structures & TCPs.

There is a need for plan to address the proactive management of grazing allotments to protect cultural resources.

[There is a need to] identify traditional cultural properties for land grant communities and take these areas into consideration during the NEPA/implementation process.

[There is a need to] include traditional community histories in plan revision process—consult with local historians.

[There is a need for] users of land where [there are] deteriorating arch resources occur need to be included in decision of _____ activity.

There is a need for further analysis with respect to historic site types and disturbance factors. For example, certain sites due to their inherent greater visibility are subject to increased levels of vandalism and understanding the relationship between site types and disturbances is critical in developing management objectives and guidelines.

There is a need for further analysis to be undertaken to identify spatially explicit areas of the National Forest, where heritage resources because of their significance, extent and quality merit specific management consideration and shall include historic properties, traditional cultural properties and sacred sites.

There is a need to identify and evaluate all historic properties and a need to eliminate distinctions between archaeological sites vs. non-archaeological properties or TCPs when evaluating eligibility and effect.

There is a need to allow for adverse effects, not only to non-archaeological properties, but to archaeological sites as well. The 1985 plan allowed for data recovery and interpretation only if SHPO indicated that it was the best use of the resource. In some cases adverse effects cannot be avoided and the Forest needs to acknowledge that preservation of the historic property or cancellation of the project may not be possible.

There is a need to modify or eliminate references to the State Historic Preservation Plan and the State Archaeologist. The State Plan is revised every five years and the Forest is encouraged to participate in its development but it probably is not necessary to reference it in the Forest Plan. Likewise, reference to the State Archaeologist could be eliminated since the duties of that position have changed since 1985 and the State Archaeologist's role in planning and Section 106 consultation is limited.

There is a need to address increased vandalism and increased construction impacts to historic properties and the role that site stewards play in assisting the Forest in archaeological site protection and preservation.

[There is a need for] users of land where [there are] deteriorating arch resources occur need to be included in decision of rehab activity.

[There is a need to] use TSP for arch surveys.

[There is a need] to support the traditions & culture of American Indians tribes & Land Grants & other residents of the Cibola National Forest.

There is a need to seek greater participation from the public in the protection and preservation of historic properties (including archeological sites), including through the use of emerging information and communication technologies.

There is a need to balance the need for public access with the closure of travel routes and areas

for the protection of cultural resources.

There is a need to withdraw from mineral entry all traditional Cultural properties.

[There is a need for] allowing the Merced (Hispanic) & Pueblo (Native Am) peoples to practice traditional rights land usage. See a) UNM Land Grant Studies &; b) NM State, Leg. Land Grant Interim Committee recommendations & studies, (documentations); c) NM Merced “Consejo” reports & recommendations.

[There is a need for the plan to provide direction for the] return all lands back to the original & legal owners, as per Treaty of Guadalupe Hidalgo & the same imbedded treaty as the foundation to the N.M. State Constitution.

[There is a need for the plan to provide direction for] enforcement of traditional rights to Forest (USFS), Bureau of Land Management, NM State, entities & land & water usage.

[There is a need for the plan to provide direction for] social, cultural, the Land Grants need to be added & its people the need for people have firewood for their need to heat homes. There needs to add the importance of Land Grants, not just tribal needs; working with the Land Grant communities; no more wilderness. _____ work with the permittees on # of cattle, not just cut them off; need to ck how many acequias are in the forest lands.

[There is a need for] identification of significant cultural resources, including those that are still in use, like acequias.

There is a need to interpret the history & naming of canyons, trails, local areas.

There is a need for the management plan to recognize that areas of the Cibola National Forest, and all of the activities that take place within its boundaries, are culturally and religiously significant to individuals of all backgrounds.

There is a need for change, in archeological clearances and other situations to be more prompt, and proactive.

Areas of Tribal Importance and Tribal Use of Forest Resources

There is a need for the revised plan to ensure that implementation of Forest programs and activities is consistent with, and fulfills the Federal Government's legally mandated trust responsibilities with Tribes.

There is a need for the revised plan to address contemporary tribal use of forest land and resources, and tribal interests within the plan area. The 1985 Forest Plan does not contain information related to tribal relations or tribal use, interests, or concerns.

There is a need for the revised plan to ensure that direction reflects the recommendations of the 2012 Report to the Secretary of Agriculture – USDA Policy and Procedures Review and Recommendations: Indian Sacred Sites, particularly as it relates to considering the broader concept of “sacred places” in planning efforts.

There is a need for the revised plan to use discretion in land management decisions to find creative ways of incorporating protections for sacred sites in Forest project NEPA decisions, and to give due consideration to accommodating and mitigating for the protection of sacred sites.

There is a need for the revised plan to restrict/prohibit the establishment of new communication sites and expansion of existing communication sites on high places (mountaintops and ridges) that are identified as part of an important cultural landscape by a tribe(s).

There is a need to consider in the planning process the designation of special management areas to aid in the protection of natural and cultural resources important to tribes.

There is a need for the revised plan to support and accommodate, where appropriate, requests for reburial of human remains and cultural items on the Forest, pursuant to agency authority under the provisions of the 2008 Farm Bill (Food, Conservation, and Energy Act of 2008, Pub L. 110-246, Title VIII, Subtitle B, Cultural and Heritage Cooperation Authority, Sec. 8103).

There is a need for the revised plan to support and accommodate the collection of forest products for traditional and cultural purposes.

There is a need for the revised plan to clarify the Forest's authority to implement temporary closure orders to ensure privacy for tribes engaged in cultural and ceremonial activities, pursuant to 2008 Farm Bill (Food, Conservation, and Energy Act of 2008, Pub L. 110-246, Title VIII, Subtitle B, Cultural and Heritage Cooperation Authority, Sec. 8104).

There is a need for the revised plan to provide direction that species important to tribes are managed for sustainability.

There is a need for the revised plan to prioritize for acquisition any private land inholdings that possess areas of ecological or cultural importance.

There is a need for the revised plan to encourage opportunities for working across boundaries to manage landscapes and address threats to adjacent tribal resources through the Tribal Forest Protection Act of 2004; and to meet common objectives identified in Tribe's and Pueblo's land management plans to meet an "all lands" approach to resources management.

There is a need for the revised plan to have the flexibility to facilitate and support tribal minerals and renewable energy development, and the need for transmission across FS lands.

NEW!!

There is a need for the revised plan to relate desired conditions with changing climate and change in water resources, where habitats and vegetation locations, composition, and structure will likely be changing. This information will help prepare tribal people for potential changes in the above related to certain important plant and animal species.

There is a need to determine if any special treatment of "sacred sites" on public lands is in conflict with other Federal Laws concerning "separation of church and state" and/or other Federal policies and laws concerning the preferential treatment of favoring one "religion" over another.

There is a need to manage the Forest in a way to assure that ALL persons and/or groups

(including individual Indians and tribes) that they receive consideration for the same special treatments that are not specifically addressed by Federal Law.

There is a need for plan to acknowledge the ongoing & continuing communication with tribes that use the forest & to focus on enhancing partnerships with tribes.

There is a need for plan to consider alternative infrastructure (communication sites) on mountaintops. Pursue technological advances that the tribes will support & will reduce the footprint of impact.

There is a need to accommodate & encourage tribal site visits to identify areas of importance, sites, plant of value so info can be incorporated into management strategies.

There is a need to accommodate management activities within historic properties, in consultation w/ affiliated tribes, to accomplish site/area specific protection.

[There is a need to] educate the Forest staff, including the front-liners, about tribal uses—make it part of the “Cibola FS culture.”

There is a need for change to increase communication of information from decision makers to forest staff that has contact with the public.

There is a need to integrate our Forest Restoration Plan with tribal cultural needs. “Blend” needs for both, e.g. protect areas of vegetation use (broad areas-no specific plants or area) and do not affect by FS activities in the areas.

There is a need to manage the Mt. Taylor Traditional Cultural Property (TCP) in a manner that protects the area’s cultural resource values. For example, the existing Inventoried Roadless Areas (IRAs) and other roadless lands may offer opportunities to ensure the TCP and its associated values are conserved.

There is a need to include plan direction in anticipation of potential proposals for transmission corridors and renewable energy generation and their potential disruption and displacement of traditional activities (see also GEOLOGY, MINERALS, and ENERGY needs for change)

There is a need to consider changing technologies and energy development interfering with traditional ceremonies.

There is a need for the revised plan to provide direction that the habitat[s] for species important to tribes are managed for sustainability.

[There is a] need to ensure that access continues (elders go to the mountains to say prayers, to communicate with the deities).

[There is a] need to ensure access to the harvesting of traditional plants.

[There is a] need to ensure that motorized access is available for traditional use.

[There is a] need to ensure continued access to forest products—pinon in particular—concern about prohibiting access to pinon in some areas.

There is a need to address issues of private landowners blocking access to cultural and traditional hunting areas on public/NFS lands. (Easements are needed.)

There is a need for a simplified, less complicated, process for annual permission for acquiring forest resources/products – particularly those that are used for traditional/religious purposes and normally collected in a relatively small quantity.

Because the Pueblo uses Forest products for religious/traditional purposes during the summer – usually a high fire time – there is a need for a proactive process for granting permission for entrance into the forest during periods of high fire danger that are less restrictive – less specific in terms of number of participants, precise location and dates of use

Timber Production and Non-timber Forest Products

There is a need to reconsider which areas of the national forests are available for timber management and potentially set different priorities for when and where timber harvest may occur; facilitating an appropriate level of sustainable timber production.

To support the traditions and culture of American Indian Tribes and other residents of the Cibola National Forest “area of influence” (AoI – the 10 counties in which the mountain ranger districts reside), there is a need for the revised plan to provide direction for management and accommodation of the removal of miscellaneous products for commercial, noncommercial, and tribal and land grant use, such as wood products, firewood, grass seed, plants (used for food, fuel, medicine, or crafts) or other materials.

NEW!!

There is a need to establish which areas of the national forests are available for timber management and set different priorities.....

There is a need for the Forest Plan to provide a focus on developing sustainable markets to support the restoration of forests for the overall health.

There is a need for the revised plan to favor a balance of recreational and conservation opportunities as well as any changes in allowable tree harvest sizes which would permit chip and pellet businesses to thin at no cost to taxpayers.

Change to add to the above: “post-fire sites” or “potentially allow more rigorous wood or timber harvesting in burned areas with a large number of dead or down trees.”

[There is a need to] expedite salvage timber sales (post fire, insect & disease outbreaks)

There is a need to more vigorously address the issues with partner agencies and organizations that arise from overly dense forest stands. Thinning spurs economic activity from forest products, increases snowpack and thus surface water, and lessens loss of snowpack to evaporation or sublimation among other benefits.

There is a need to develop an action plan for forest thinning and catastrophic fire suppression. This action plan should include steps the USFS will take to conduct forest thinning, controlled burns, etc., with a timeline and available resources. The USFS will mutually benefit from removing all (including burned) biomass from the Cibola.

There is a need to more efficiently manage the National Environmental Policy Act process in forest thinning and fire mitigation activities.

[There is a need for the revised plan to] get a particle board manufacturer or a pellet stove maker of pellets to come in and hire people, start a company and harvest all the small diameter trees. That would make the forest healthy, create jobs and help industry. But, it appears Forest Service would sooner burn controlled burn or fighting fires.

There is a need for the revised plan to facilitate businesses developing long-term contracts w/USFS in order to build forest industry in New Mexico. It is difficult for these businesses to be sustainable if they are only operating on year-to-year contracts.

There is a need to develop a systematic method to utilize community members through firewood sales to help remove potential fire threats.

There is a need for improving range management and commercial firewood harvesting access because of the economic importance of these activities to the Village of Corona.

There is a need to reevaluate the number of months or years of viability in which companies or private users can harvest burned trees after a fire. Certain timber markets and the USFS will mutually benefit from removing all (including burned) biomass from the Cibola.

There is a need for change to evaluate the potential impact of water runoff associated with burn scars, and how logging and thinning can reduce this risk.

There is a need for change in the forest management plan to increase the economic impact of the forest on the local community by encouraging and expanding the following activities: Logging and thinning as needed to decrease the potential of catastrophic wildfire; Responsible grazing of livestock; Responsible mining operation.

The mountain (Mt Taylor) needs forest restoration. It is badly over grown and this needs to be addressed before a catastrophic wild fire addresses this for us.

Range and Grazing

The revised plan needs to provide management direction to the livestock grazing program that incorporates adaptive management toward ecosystem-based desired conditions, with particular emphasis on management in times of drought or other extreme weather related events. There is a need for the revised plan to incorporate into plan direction adaptive management strategies from past NEPA decisions in order to adjust management decisions to meet desired conditions and/or project standards and objectives, as the need is determined through monitoring.

- Building adaptive management flexibility into management allows for decisions that are responsive to needed adjustments in permitted actions. Historically, decisions have been too narrowly focused, such as deciding to authorize a specific number, kind, or class of livestock with specific on- and off-dates under a specific type of grazing system. These kinds of decisions have restricted management flexibility in meeting desired conditions and project objectives.

Previous project-level NEPA-based decisions remain valid as long as the authorized activity complies with laws, regulations, the current forest plan, and is within the scope of the project-level NEPA-based decision. Therefore, it is not necessary to initiate new site-specific analyses in order to undertake a modification that has already been analyzed, decided upon, and documented. Management actions should be adjusted when monitoring indicates that those actions are not effective in reaching defined objectives.

The revised plan needs to change range management emphasis from providing “forage to promote sustained livestock yield” to “using livestock to achieve and sustain desired conditions and improve resistance and resilience in the face of short-term drought and anticipated climate change.”

The revised plan needs to address closer coordination with NMDGF on elk use of Cibola forest and rangelands in order to minimize degradation of those lands by elk, livestock, or both.

NEW!!

There is a need for the revised plan to allow for reassessing and renegotiating grazing MOUs to reflect climate change, projected drought cycles, catastrophic wildfires, best available science, forest health, wildlife health, recreational issues, and best new practices.

There is a need for the revised plan to reevaluate grazing permits, especially in the months allowed for AUMs to avoid continued decline in an already unhealthy forest.

There is a need for the revised plan to address the spread of invasive species during livestock hauling by grazing permittees.

There is a need for the revised plan to reconsider the range capacity for livestock grazing in light of climate change, historical grazing impacts and likelihood of continued drought.

There is a need to better coordinate with BLM and other adjoining tribal, private landowners on fencing issues. Fencing boundaries is needed so that grazing permittees can use those areas. Good fences make good neighbors.

There is a need for better/more coordination between USFS, BLM, and tribal etc. law enforcement with regard to trespass livestock.

There is a need to reduce, eliminate or control unwanted trespass (feral horses) livestock on the National Forest.

There is a need for sustainably managed access to riparian areas for grazing purposes. Managed riparian grazing should be maintained in all ranger districts to ensure riparian vegetative communities are achieving their full potential (Baker et al, 2001) and that legal water rights of livestock owners are maintained.

There is a need to work more synergistically with the New Mexico Game and Fish Department in managing elk herds in the Cibola. Access to forage for grazing permit holders can be better managed with a more cohesive plan for elk herd management.

There is a need for more adaptive management in implementing the Environmental Assessments

and grazing plans for grazing permit holders.

There is a need to more cohesively address native and nonnative invasive species. Though the use of NMDA's Invasive Species List (see works cited) is appreciated and should continue, invasive species should be evaluated and addressed on an ecosystem-by-ecosystem basis. Each ecosystem has unique health needs and problem plants and animals-not all of which can be addressed in a one-size-fits-all approach.

There is a need for the USFS to allow permit holders to apply herbicides on their allotments given they have followed the correct steps to obtain their pesticide or herbicide applicator's license.

There is a need to more proactively plan for water access for grazing in times of drought. This will help mitigate hardships encountered by grazing permit holders in terms of forage and water expectations in their business planning.

There is a need to coordinate and consult with other outside groups (such as NM State Univ.) on tasks such as developing range mgmt. plans and monitoring protocols.

There is a need for sustainably managed access to riparian areas for grazing purposes. Managed riparian grazing should be maintained in all ranger districts to ensure riparian vegetative communities are achieving their full potential (Baker et al, 2001) and that legal water rights of livestock owners are maintained.

There is a need to create a reliable protocol to involve grazing permit holders when decommissioning or disinvesting infrastructure that affects allotments in the Cibola.

There is a need for Forage Monitoring. A standardized monitoring system for the forest, all districts, needs to be adopted and used. The monitoring system needs to collect Quantifiable Data at the end of each growing season. Again every year. When possible use allotment owners to help collect data so they are in the loop.

There is a need to address wildlife impacts to range and grazing. As wildlife number increase the more available Forage will be harvested. When using a Rest Rotation system on an allotment the pastures that are rested will be depleted by the elk in the surrounding area. When this happens the livestock get the blame. A policy needs to be in place that limits and monitors wildlife numbers on the forest, just like we do Livestock numbers. If wildlife numbers go unchecked, in drought conditions, Resource damage will result.

There is a need to change range management direction during drought. In drought conditions when livestock numbers are cut all it does is allow the elk population to take over more country and multiply. The elk in the San Mateo and Magdalena Mountains were introduced in the 1960s.

The plan needs to contain a policy that sets a range of population of each species that is allowed on the forest. If not monitored and a set population goal in place the population will continue to grow and resource damage will result.

There is a need to develop policy for woody species to have the ability to thin the forest and have timber sales before and then after fires. Need to have a wed program to be able to spray weeds.

Use volunteers where possible, a possibility would be allotment owners to be able to spray weeds. Brush control is another item that needs to be included.

*The plan needs to change the priorities for multiple use including, Recreation, Grazing of livestock, Wildlife habitat, Erosion control including road maintenance, Forest stand health including wildfire mitigation, Vegetation improvement management. Changing Grazing to a priority elicits the following benefits: * "eyes on the round" to report management issues including trespass, firewood theft, invasive species infestation, illegal activity, forage trends, erosion issues. *Improves area for wildlife including water, salt & mineral availability *Revenue generation for local economy *Sustainable conversion of renewable resource to human nutrition: grass to beef *Stimulates/spreads desirable grasses & forbs *Potential to target undesirable species by grazing at palatable growth stages, such as Russian Thistle, Kochia *Potential to spread seed of desirable plants *Hoof prints may capture rainwater, control erosion and capture seeds of desirables *Reduces ladder fuels: preventing wildfire escalation, and survivability of desirable species*

There is a need to address the continued reduction of grazing allotments/livestock grazing numbers; the problem with reducing the number of grazing animals is NOT the way to improve ecosystem health. Time is what is needed, in that, I mean the time that a plant is exposed to grazing before being grazed again. Rest or non-grazing time is a management decision best made by those closest to the land, and in most cases means the permittees themselves. A time of rest is useful in controlling the grazing of an area, but total rest in our arid climate does more harm than good. Once again, grazing the same units the same time every season does not stimulate new and different grasses and help them get established, such as cool season and warm season grasses.

There is a need for change, in cross fencing, and roadway fencing, to facilitate pasture rotations, and plant health.

There is a need to recognize that on shared permits, all livestock owners must not be blamed for misuse of one of the allottees, and consideration taken for those doing things right.

There is a need to change, that incorporates resting pastures for a season at a time, but this will require infrastructure improvements which I will also add.

There is a need to, NOT to further reduce livestock numbers, {as some have already been reduced by 2/3} in fact in some cases number need to be increased. However there may be a need to change grazing months. I personally do not see a need to change something that is not broken.

There is a need to Consider and confer with allottees that have used their allotments for generations, and to acknowledge that most Livestock producers are the best keepers of the land not only for their livestock, but wildlife as well. They have a vested financial interest in keeping their allotments healthy.

Once again there is a need to define Best Science, as FS science may not agree with Range science.

There is a MAJOR need to publically acknowledge the thousands of dollars permittees spend

every year, not only on grazing fees, but taking care of water sources, fences, prescribed grazing to avoid wild fire, and many other things, that benefit not only the livestock, but the wildlife, and public in general.

There is a need to acknowledge both in print, and in public, the legal rights that permittees have on the permits they own concerning the grazing of their livestock on National Forest land. Also including the waters used on, in, and around, those permits.

Recreation

There is a need for plan direction to be less prescriptive and reduce the restrictive language, but rather provide broad guidance to the recreation program.

Because of extensive development of adjacent non-NFS lands and a drastic increase and changes in types (e.g., trail use vs. picnicking) of visitor use of many areas, 1985 Recreation Opportunity Spectrum classifications are impractical. There is a need to update the Recreation Opportunity Spectrum classifications and adjust the total acres in each class in the revised forest plan.

Change to: There is a need to update the Recreation Opportunity Spectrum classifications and adjust the total acres in each class in the revised forest plan.

There is a need to for revised plan direction to revamp group size limitations within designated wilderness areas.

Change to: There is a need for revised plan direction to revamp group size limitations within designated wilderness areas.

NEW!!

Change the statement to read: "There is a need for revised plan direction to reconsider group size limitations within designated wilderness areas"

There is a need for plan direction to allow adaptive assessment of site capacity (persons at one time) [PAOT] of developed and dispersed recreation sites and allow managers the flexibility to change site capacity based on demand and management ability.

There is a need for plan direction to allow more flexibility in reporting of acreage adjustments to *Recreation Opportunity Spectrum* and *Wilderness Opportunity Spectrum* classifications affected by road closures and the revisions to ranger district motor vehicle use maps.

Change to: Add qualifier such as "public input" to "allow more flexibility" to ensure continuity.

NEW!!

Add qualifiers to provide management continuity and public input to statement "There is a need for plan direction to allow more flexibility in reporting acreage adjustment to Rec. Op. Spectrum."

There is a need for plan direction that addresses the use of volunteers for dispersed and developed recreation maintenance and construction consistent with volunteer regulations. Revised plan direction should avoid prescribing whether use of a particular developed site requires a fee, as this is entirely dependent on fee authorities that periodically sunset.

Change to: (two separate statements)

There is a need for plan direction that addresses the use of volunteers for dispersed and developed recreation maintenance and construction consistent with volunteer regulations.

The revised plan direction should avoid prescribing whether use of a particular developed site requires a fee, as this is entirely dependent on fee authorities that periodically sunset.

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There is a need for plan direction that addresses the use of volunteers for dispersed and developed recreation maintenance and construction consistent with volunteer regulations.

The revised plan direction should avoid prescribing whether use of a particular developed site requires a fee, as this is entirely dependent on fee authorities that periodically sunset.

There is a need to be responsive to changing trends in regard to services, activities and types of facilities desired by the public, but balance those with fiscal reality. The trends in demographics such as the expectation for an older and more ethnically diverse population, the need to promote outdoor physical activities, especially among youth, and the desire to support local cultures and economies should all be considered in establishing a path forward for recreation management on the Cibola National Forest mountain ranger districts. The revised plan should consider:

- Trends such as increasing day use versus overnight use, and increasing interest in wildlife viewing, should be taken into account.
- Public safety, including geologic and hydrologic concerns, potential user conflicts, conservation of natural resources, and maximum effective use of available funds should all be recognized as important considerations.
- Improvements to barrier free accessibility should be continued.

NEW!!

Geocaching- There is a need to develop forest wide direction on geocaching in the General Forest Area.

Forest Protection Areas: There is a need to establish closures to specific recreation activities (i.e. camping) in areas sensitive to degradation or at risk due to high visitation.

Leash Laws: There is a need to analyze forest plan direction on pet leash laws, specifically on the Sandia Ranger District. Currently, district and forest direction is inconsistent with statutory regulations in Bernalillo and Sandoval counties which require pets to be leashed at all times within county limits (including NFS lands).

Statement of multiple (recreation) use: There is a need for a clear and explicit direction statement

that describes forest policy on the inclusion of most types of recreational use on the forest but that not all recreational uses are appropriate in all areas of the forest. This is to help address user conflict (some people hate Mt. bikes or dirt bikes, or ATVs, or equestrians and want them excluded from their enjoyment of the forest, this type of statement would make these interactions much easier for managers).

Statement of “Resource Equality & Interrelatedness”: There is a need to elevate the importance of recreation management to the same level as other resources on the Forest. (Until VERY recently, recreation was an afterthought in most management decisions. However, recreation & trails management is just as important and interrelated with the other resources. Direction is needed to ensure that recreation is considered in all resource management decisions focusing on comprehensive natural resource restoration)

There is a need for clear forest plan direction that declares Travel Management implementation, funding, monitoring, and enforcement as an interdisciplinary/multiple resource responsibility. The travel management decisions clearly benefit ALL resource areas yet responsibility for implementing the decisions has thus far rested almost exclusively with recreation & trails staff.

There is a need to analyze the demand for and access to both developed and undeveloped overnight opportunities.

There is a need to clearly identify which developed recreation sites are “day-use only.” Generally speaking, picnic areas are day use only and trailheads are not. However, oftentimes trailheads are collocated with picnic areas. Direction is needed to clarify this management issue.

There is a need to provide forest direction on the management of snowmobiles/over-snow vehicles

There is a need for forest plan direction related to hazard trees in developed sites but more specifically about “reforestation” efforts of the developed sites. (ensure consistency with FSH & FSM direction).

There is a need for forest direction related to metal detecting in developed and undeveloped areas of the forest.

There is a need to include Forest Service accessibility guidelines for all recreation resources by reference.

NEW!!

There is a need to develop plans to accommodate continuous changes in the type of recreational activities and their associated technologies. Flexible plans should allow for appropriate utilization of the changing types of travel vehicles such as, but not limited to, off-road vehicles (not street legal), mountain bikes, gyrocopters, dirt bikes, 4-wheel drive vehicles, etc.

There is a need to better recognize and potentially enhance the role of the Cibola National Forest in supporting local economies through the service-based economy that includes recreation and tourism.

There is a need to update the Recreation Opportunity Spectrum delineations to better reflect on-

the-ground conditions and to update and plan direction associated with ROS areas.

There is a need for increased access to wilderness areas for people with special mobility needs.

There is a need for the FS to communicate more effectively to the public about the group size limits and the reasons for those group size limits. Supports limits but wants more public education & communication.

There is a need for increased staffing (on the Mountainair RD-Manzano Mtn. unit) in order to increase maintenance of the existing trail system. Forest should investigate the use of volunteer community resources.

There is a need to monitor recreational use of wilderness areas, especially the Sandia Wilderness. Partnering with community groups can help provide labor and add transparency and build partnerships.

There is a need to partner with biking and hiking groups to maintain, and when appropriate, build new trails. Having more “official” trails that are appealing to i [?] might reduce social trails.

There is a need for annual review of travel mgmt decisions.

There is a need to incorporate into the Forest Service Revision Plan with the mandated “handed down” Travel Management Plan. The Travel Management Plan overrided or _____[?] the Forest Service Plan, which defeats the purpose of the Forest Plan.

There is a need to consider a fee/permit for mountain bikes. This will help pay for trail maintenance similar to fees collected from hunting, range permit fees, etc.

[There is a need to] give high priority to local voice that translates to forest priority.

[There is a need to] be less restrictive, less closures for recreational use and mountain bikes.

[There is a need to] revise TM [Travel Management].

[There is a need to] _____ or be flexible on seasonal closures to respond to local conditions & resources changes/needs.

[There is a need for] local input to be a component of the decision-making process for any component.

[There is a need for] more flexibility in management plan—less prescriptive. Make prescriptions that apply to all recreational users, not just one group—“all in or all out.”

[There is a need to] revisit the travel management decision to ensure it is consistent with current and predicted needs for motorized access.

[There is a need to] provide more flexibility for seasonal road closures that are responsive to actual weather conditions, especially in the face of climate change.

[There is a need for] a way for recreational users to determine habitat/cultural risks before

encouraging increased use of specific areas. (e.g. finding new rocks to climb could threaten habitat.) A collaborative effort could reduce impact.

[There is a need to address] Cave Management Planning. Several cavers present at the meeting will work on a draft of an Appendix focused on caves, cave management, cave research, cave access & protection.

There is a need for the revised plan to consider temporary suspensions on the ban on motorized equipment in the wilderness areas of the Manzano (perhaps elsewhere) and bring in a crew of chainsaw operators to quickly remove the blowdown from the trail and to take down tress that will soon be coming down on the trail in the near future (dead ones).

There is a need for the revised plan to allocate funds (for recreation) among ranger districts.

There is a need for the revised plan to prioritize quiet recreation over off-road vehicle and other motorized uses.

There is a need for the revised plan to inventory and evaluate existing trailheads, trails, and access roads for improvements, and opportunities for additions should be identified. There are organized groups of volunteers that can help establish priorities and help return many of these to good condition. The former Forest Plan considered volunteers in terms of "Adopt a Trail". However, a schedule of trails to be worked on involving all interested groups with coordination through the Forest Service might be a more effective way to harness the energy of our local volunteers.

There is a need for an increase in the number of camping locations and trails in the Magdalena District to attract folks from southern NM. This will be very important when the Spaceport becomes active. Volunteer groups may be able to help executing these improvements.

There needs to be a way for recreational users to determine habitat/cultural risks before encouraging increased use of specific areas. (e.g. finding new rocks to climb could threaten habitat). A collaborative effort could reduce impact.

There is a need to increase public access to the South East side of the Sandia Mountains, specifically Cole Springs Road.

[There is a need to] improve signage during Forest closure.

There is a need for the revised plan to inventory and evaluate existing trailheads, trails, and access roads for improvements, and opportunities for additions should be identified. There are organized groups of volunteers that can help establish priorities and help return many of these to good condition. The former Forest Plan considered volunteers in terms of "Adopt a Trail". However, a schedule of trails to be worked on involving all interested groups with coordination through the Forest Service might be a more effective way to harness the energy of our local volunteers.

There is a need for change in the forest management plan to encourage and expand the following recreational activities in the Cibola National Forest: Off road vehicle (ATVs, UTVs, Motorcycles, Snowmobiles, 4x4's, etc.) use on designated roads and trails; Mountain biking;

Hiking; Camping; Backpacking; Hunting and fishing; Horseback riding; All other activities that users of the forest participate in and enjoy.

There is a need to provide forest direction on the management of snowmobiles/over-snow vehicles

There is a need for a clear and explicit direction statement that describes forest policy on the inclusion of recreational use on the CDNST and that not all recreational uses are appropriate along the CDNST.

There is a need to update the Recreation Opportunity Spectrum classifications and adjust the total acres in each class in the revised forest plan specifically for the CDNST across the Magdalena and Mt. Taylor Ranger Districts.

There is a need to review new uses allowed along the CDNST route in order to prevent substantial interference to the nature and purpose for which the Trail was created. This would include the establishment of monitoring programs and LAC type management actions prior to allowing any new uses, to ensure the Nature and Purpose for which the Trail was created are not negatively impacted by such uses.

There is a need for more education of non-motorized users that motorized use is a legitimate use of the Forest and they are likely to encounter these uses.

With the addition of bike trails, and ATV use there is added stress to FS Properties, and the NEED FOR CHANGE here is that a User fee needs to be charged, to help pay for improvements such as maintaining trails, and enforcement officers. I have spoken to many of the mountain bikers and have yet to find one that would not pay a user fee like the hunters and fishermen, and cattle producers pay.

There is a need for the revised plan to consider recreational aviation activities and recreational airstrips when developing desired conditions for recreation and infrastructure.

There is a need for the revised plan to consider recreational aviation activities and recreational airstrips and include in planning considerations for recreation and infrastructure.

There is a need that the Cibola pursue an alternate access point and/or connector trail into the Forest between Canyon Estates and the Cienega Picnic Ground on the Sandia RD.

There is a need to increase authorized group size of hikers in the Sandia Wilderness

Trails

There is a need for the plan to better address the sustainability, relevance, and feasibility of existing and planned trail systems.

Change [above] to: There is a need for the plan to address the sustainability of the trails and trail systems.

Plan direction could address:

- New approaches to trail management including trail construction and maintenance,

- given the reality of limited maintenance funds; focusing priority on trails and trail systems that are financially, environmentally, and socially sustainable.
- Sustainable trail design and maintenance standards providing for trail experiences that the public desires, e.g., loop opportunities, connectivity, and destination trails.
 - Ways to address the supply and demand for differing types and skill levels of trail users (motorized, mountain biking, hiking, and equestrian use). In some areas it may be appropriate for shared use trails, while in other areas a separation of uses (use-specific) may be more appropriate. In some locations, restricting equestrian and mountain bike use to designated routes (similar to motorized travel) or areas may need to be considered.
 - Working with local communities that wish to promote certain trail systems and special events – such as for mountain biking –to support the community while not compromising other recreation users or other multiple-use objectives.
 - The revised plan should include approaches utilizing use of partnerships, volunteers and/or user councils to assist with maintenance issues and to recommend solutions to user conflicts.
 - Assessment and management of unauthorized trails.

NEW!!

There is a need for the Cibola National Forest Plan to provide management and planning guidance of the Continental Divide National Scenic Trail in accordance with the *National Trails System Act of 1978* and the *2009 Continental Divide National Scenic Trail Comprehensive Plan*.

NEW!!

There is a need for better and more trail maintenance and signage for non-mechanized travel. This should include information about directions for water availability for long distance trekkers such as those on the Grand Enchantment Trail which passes through the San Mateos, Magdalenas, Manzanos and Sandias.

[There is a need to] establish a ____ of youth, etc. corps to draw on them to re-establish trail system in the nearby abandoned trails.

[There is a need to] incorporate enforcement of illegal trail development.

There is a need for the revised plan to add currently unauthorized trails to the system will help disperse use, reducing hiker concentration on the current heavily used trails. Signage (notably in the Placitas area) and more official access points will help reduce user tendency to blaze their own access. Hikers like connections between trails to vary familiar hikes by creating loops, cross overs and access to special features of interest. Two of the unofficial trails especially worthy of addition to the trail system are (1) the White Rock Trail on the west side, going from the end of Menaul Blvd to the Oso Pass junction of 3 Gun and Embudito Trails; and (2) Larry's Trail on the east side which connects Faulty and South Crest Trails.

There is a need to control access of motorized vehicles on wilderness trails and forest trails to enable hikers to enjoy trials in quiet and relaxation.

There is a need to keep trails maintained and in good shape (trails that erode or trees that fall down across the trails).

There is a need for the plan to emphasize professional management of trails (used Placitas as an example).

There is a need for additional trail information (specifically signs) to help inform users of the trail's wilderness status and group size limits/locations.

There is a need for additional Forest Plan direction for winter recreation and trails management on the Sandia Ranger District.

There is a need to develop additional volunteer organizations and partnerships (such as Friends of Sandia Mountains) to assist with trails and recreation programs on all districts of the Cibola NF.

There is a need for change related to insufficient/inadequate trail maintenance.

There is a need for change for the Forest Plan to increase the amount of mountain bike and hiking trails in the Zuni Mountains. There is an increasing public demand for a high quality challenging network of mountain bike and hiking trails in the Zuni Mountains. There are unauthorized trails in sensitive or impaired areas that are impacting watershed resources such as water quality, soil condition, and wildlife habitat. The designation, construction and maintenance of trails and associated visitor use facilities would enhance or maintain watershed resources within the Zuni Mountains.

There is a need for change to clearly designate, at the trailhead, what acuties or vehicles are acceptable on the trail or road.

There is a need for more ATV trails but limit them to exclude some of the aspen elevation areas.

There is a need to update and address existing and proposed energy and utility developments, as well as extraction activities along the CDNST Corridor in the Cibola National Forest.

There is a need to relocate the CDNST off of roads and ensure the intent of the 2009 Comprehensive Plan direction is met. CDTC encourages the following factors be included in this process: It is the intention of Congress for the Continental Divide National Scenic Trail to be a primitive and challenging non-motorized trail traversing the Continental Divide from Canada to Mexico. New CDNST construction should link to existing non-motorized segments of trail, or a plan should be in place to address the motorized uses on either end in the near future in order to meet the intent of the CDNST as a non-motorized trail. All agencies should plan and construct the CDNST to include the following characteristics: Built to a non-motorized standard – Fully accessible for foot and equestrian use. Portions accessible for mountain bikes where appropriate and consistent with Unit Plan direction: Challenging – Requiring a need for self-reliance and backcountry skills. Located through the most primitive, diverse and undeveloped landscapes on or near the Continental Divide. Accesses or is routed near nationally significant scenic, historic, cultural and natural features. Allows for an opportunity to view dramatic or unique scenery. Allows for an opportunity to view wildlife. Provides appropriate access to water sources. Developed to the most simple, yet high quality standard.

There is a need for the preparation of a unit plan that will establish the Trail Class, Managed Uses, Designed Uses, and Design Parameters, as well as uses that are prohibited, on trail

segments.

There is a need to change and remove the Continental Divide Trail Alliance from the existing partners and add the Continental Divide Trail Coalition and the Continental Divide Trail Society.

There is a need to update the management areas of the Magdalena and Mt. Taylor Ranger Districts to reflect new direction of the 2009 CDNST Comprehensive Plan.

There is a need for an inventory of existing CDNST trailheads and access points to ensure that appropriate access to the CDNST is provided. This includes the development of consistent Trailhead design across all Cibola Forest Areas across which the CDNST Corridor traverses.

There is a need to ensure identification, provision, development, and access to water resources for users along the CDNST in the Cibola National Forest.

There is a need to review the inclusion and support of volunteer stewards and youth corps partners in the management, maintenance, and construction of the CDNST in the Cibola National Forest.

There is a need to review and include the developments of the high potential route for the CDNST through the Alamocita Creek area to ensure the potential Trail Corridor route is protected as trail development continues and is resolved.

There is a need to establish and incorporate a monitoring program (consistent with the CDNST Comprehensive Plan) for the CDNST that addresses uses and carrying capacity of the Trail and its corridor.

There is a need to reconsider the overall management and direction in the 1985 Cibola Forest Plan for the Continental Divide National Scenic Trail.

There is a need for greater agency cooperation with willing volunteer groups to plan, develop and maintain motorized trails.

There is a need for more trail systems developed for motorized use: single track (for motorcycles), less than 65 inches (for ATV/UTV), and “challenge” routes (for 4WD).

There is a need to implement the 2009 Comprehensive Plan for the CDNST and current Forest Service policies [FSM 2353.44b]. Matters to be addressed would include, among other things: Establishment of a management area, with desired conditions, objectives, standards, and guidelines. Preparation of a unit plan that will establish the Trail Class, Managed Uses, Designed Use, and Design Parameters, as well as uses that are prohibited, on trail segments. Provision for management of scenery for the CDNST as a concern level 1 route with a scenic integrity objective of high or very high. [The Comprehensive Plan and FSM 2353.44b provide detailed direction and guidance that need to be observed in the planning process. This proposed need-for-change statement is intended to highlight and incorporate all of the policies set out in those documents.]

There is a need to relocate the CDNST off roads. This can be addressed (1) in establishing the location of a suitable management area in the Forest Plan, (2) by establishing such a

management area in the development of a unit plan, or (3) as has been "common over time" according to the 2009 Comprehensive Plan, by acting at a later date to promote a sound land management program. [There are several opportunities to improve CDNST location - including options in the Sawtooth Mountains and on San Rafael Mesa. Various factors may stand in the way of implementing these relocations as part of the Forest Plan/unit plan revision - such as land tenure and rights of access to Forest land. The revision should recognize these potential opportunities for improvement of the route and should refer to them in the objectives set out for the CDNST. Then, when an opportunity for implementation arises, the Forest could proceed with an appropriate project proposal, without need for a Forest Plan amendment.]

The Forest Plan (or unit plan) will, or course, need to modify the definition of management areas to include a new one specifically for the CDNST. (If the MA is not defined geographically in the Plan itself, it should be made clear that any interim designations are subordinate to a unit plan's direction with respect to the CDNST management area.)

The revised Forest Plan needs to address the requirements of the National Trails System Act as related to the Continental Divide National Scenic Trail (CDNST). This would include establishing management direction to protect CDNST corridors of located and high potential route segments. Refer to the CDNST Comprehensive Plan and FSM 2353.42 and 2353.44b for policy direction (see - <http://www.fs.fed.us/cdt/> or <http://NSTrail.org>). A discussion of planning considerations is found in the document titled: Legislative History and Planning Considerations: http://nstrail.org/management/cdnst_legislative_history_land_management_plan_considerations.pdf

There is a need for change from the plan to increase the amount of motorized trails on the Mt. Taylor RD. There is an increasing public demand for a high quality challenging network of motorized trails on Mt. Taylor and in the Zuni Mountains. There are unauthorized trails in sensitive or impaired areas that are impacting watershed resources such as water quality, soil condition, and wildlife habitat when the unauthorized trails are used. The designation, construction and maintenance of trails would enhance or maintain watershed resources and improve habitat and recreation resources everyone.

There is a need for better publication of and/or signage of group size limits at Sandia RD trailheads.

Scenery

There is a need for the revised plan to institute a flexible and updated scenery management system, based on objectives for specific areas, that allows for activities to support ecological health and creation and enhancement of diverse wildlife habitats, while retaining and enhancing pleasant and interesting scenery that supports tourism.

NEW!!

There is a need to institute a scenery management system that allows for activities to support ecological health and creation and enhancement of diverse wildlife habitats, while retaining and enhancing pleasant and interesting scenery that support tourism. For example, many areas around the San Mateo and Magdalena Mountains offer tremendous scenic vistas and look outs. There is a need to retain these scenic vistas for visitors. A scenery management system can take

this into account. [1] Proposed FSH 1909.12,70 (February 2012 draft)

There is a need to update and incorporate the Scenery Management System for the Magdalena and Mt. Taylor Ranger Districts with specific consideration of the existing and high potential route segments for the CDNST, specifically in the Zuni Mountains and Sawtooth Mountains.

Designated Areas

There is a need to consider recommendations for special designations such as wilderness, research natural areas, and special management areas with unique recreational, scenic, historic, cultural, zoological, botanical, paleontological, or geological features.

There is a need to update plan direction for managing existing wilderness. Particular issues to consider include overuse, special use permitting, the use of prescribed fire, and control of non-native species.

There is a need to include plan direction for Inventoried Roadless Areas, including opportunities for restoration.

NEW!!

Bolting: There is a need to establish clear and explicit forest direction regarding the establishment, maintenance, & replacement of bolted climbing routes in the wilderness areas (specifically Sandia Mountain Wilderness Area)

Geocaching- There is a need to develop forest wide direction on geocaching in within wilderness areas (and other designated areas).

There is a need to develop plan direction regarding massive tree die-off/beetle kill in the wilderness areas specifically along popular trails (i.e. Pino trail in Sandia)

There is a need to develop Wilderness Management Plans for all wilderness areas

NEW!!

There is a need to update the current list of designated areas (e.g., Special Interest Areas, National Trails, and Research Natural Areas) and to consider and recommend additional designated areas taking into account climate change, cultural resources, recreational opportunities, ecological features, geologic features, scenic values, and watershed values.

There is a need to consider citizen proposals.

There is a need to conduct an inventory of roadless areas given completion of travel analysis and travel management planning as well as updated inventory and evaluation procedures [1] and identify which have wilderness qualities, as well as evaluate the roadless areas as potential additions to the National Wilderness Preservation System. There is a need to consider and recommend additional wilderness areas.

There is a need to update plan direction for managing wilderness. Particular issues to consider include illegal motorized encroachment, the use of prescribed fire, and recreational use patterns

and desires.

There is a need to update plan direction for managing designated areas including national trails.

There is a need to identify the eligibility of rivers for inclusion in the National Wild and Scenic Rivers System.

There is a need to consider and recommend additional designated areas taking into account cultural resources, sacred sites, traditional use and historic values.

There is a need for the revised plan to emphasize the need for barriers, signage, and patrols to protect the Withington Wilderness from illegal motorized travel.

There is a need for the revised plan to increase the amount of forest land deemed suitable and managed for future wilderness designation.

There is a need for the revised plan to provide for coordination between [the] Cibola and tribes regarding purchase of willing sellers of private land inholdings or other Cibola admin holdings that are of ecological or cultural importance.

There is a need for Forest Plan direction to provide guidance on how to manage and address large scale tree mortality (as it related to the recreation and wilderness experience) within the wilderness areas of the Cibola NF.

[There is a] need to survey wilderness area boundaries if this has not yet been done.

[There is a need to] manage wilderness areas periodically to protect watersheds. Also, should be treated prior to designation.

There is a need to post/verify boundary of Wilderness [areas].

There is a need for change within the Forest Service to increase collaboration with other government land managing agencies (BLM, National Park Service, etc.) to encourage the full potential use of existing wilderness and other limited access areas. There is a need to avoid this ambiguous designation for any additional areas with the Cibola National Forest, Mt. Taylor Ranger District.

There is a need for areas within the Cibola National Forest, Mt. Taylor Ranger District to remain fully available for multiuse and wilderness free.

There is a need to address the CDNST as a Corridor and special designation area in the revised forest plan and reflect the corridor on maps and Forest information resources.

Special Uses

Elements of the special use permitting process are the subject of law, regulation, and policy that are not amenable to a Forest Plan decision. At same time, there is a need for the revised plan to update plan direction regarding special uses. Direction should be reexamined to determine if it conveys support for appropriate special uses of the national forest that provide public benefits, including economic and other community benefits. In addition, the direction should ensure forest resource impacts are minimized, and the discretion of Forest Service decision makers is

maintained. Among the areas where specific guidance may be needed are:

- Permitting for large and/or recurring events, including seasonal limitations;
- Permitting associated with trails receiving heavy use;
- Screening criteria for consideration of special use permits;
- Carrying capacity of areas versus the number of outfitters desiring permits;
- Clarifying resource protections associated with special use permitting such as road maintenance requirements for private easements.
- Updating spatial locations of existing utility corridor rights of way on the Cibola in existing Cibola GIS, and updating maintenance and repair agreements of special use utility easement permits.

NEW!!

Recreation Special Uses:

There is a need to develop a sustainable recreation special uses strategy as a component of an overall sustainable recreation strategy.

There is a need for direction to consider staffing and management capacity when evaluating special use permit proposals/applications.

There is a need for direction to consider resource (carrying) capacity.

There is a need for clear and reasonable direction relating to commercial filming permits

NEW!!

There is a need to better manage the distribution of firewood to alleviate crowding and allow better access to the local community. For example, create co-ops that can send a few members to collect allocated wood, then have them distribute to the co-op members.

There is a need to develop a process through which special use permit applications must go through to ensure other resources are considered appropriately, to include protection or enhancement.

There is a need to maintain current communication sites, and access to these sites, within the Cibola National Forest.

[New Topic]

Law Enforcement/Special Orders

There is a need to analyze and provide permanent direction related to long-lasting/standing special closure orders including but not limited to:

- Prohibition on possession & use of fireworks
- Dusk-Dawn closure in the Juan Tabo Basin
- Prohibition on public nudity-Juan Tabo Basin
- Prohibition on discharge of firearms-entire Sandia RD
- Minor in possession of/consuming alcohol

- Group size limits in wilderness areas
- No camping/campfires in RNA (This is in line with the Forest Protection Area concept)

There is a need for the revised plan to recognize existing right-of-way uses in the Forest.

There is a need for the revised plan to deny permits or renewals of such for U.S. military purposes – training or otherwise, on the Cibola NF.

Roads

There is a need for the revised plan to incorporate new approaches for managing roads, given the reality of limited maintenance funds combined with the public's desire for motorized access to the forest. These approaches may include considering partnerships for road maintenance, establishing priorities for maintenance to minimize or mitigate resource damage, and promoting public safety.

There is a need for plan direction to synchronize road maintenance priorities and application of best management practices with watersheds identified in the 2011 Cibola Watershed Condition

Framework analyses as being in impaired or at-risk condition.

There is a need to update the plan to include direction for closing out unneeded roads, including temporary roads and roads in environmentally or geologically hazardous locations.

NEW!!

There is a need to provide specific direction on the seasonal/temporary closure of forest system roads for resource protection & public safety.

NEW!!

There is a need to modify the Department's budget and find the critical funds needed for maintaining and restoring roads on the National Forest. This should be one of the highest priorities for the Forest Service to assure the public can enjoy their time in our national forests. There is a need to prioritize road access cases.

[There is a need for] closing, rehabilitating closed roads, remaking the need for cattle guards.

[There is a need for] _____ [?] excess unauthorized roads that are having impacts.

There is a need to develop or expand more partnerships to accomplish more road maintenance on National Forest System roads.

There is a need to provide additional access roads to provide for additional mining and recreational opportunities in the forests, particularly for older and handicapped individuals.

There is a need for eliminating excess unauthorized roads that are having negative environmental impacts.

There is a need to let outside entities provide maintenance on Forest Service roads, such as permittees, private landowners, military, outfitters.

[There is a need to] proactively fix roads that could become safety hazard-mitigate archaeological sites on roads that are in bad shape but act as emergency access to main roads for landowners.

There is a need to develop several forest roads into all-weather roads with an emphasis as scenic motor loops in and around the Mt. Taylor area in order to more evenly distribute the concentration of use and to allow tourists to have access to some of the most scenic parts of New Mexico. (details about which roads provided in letter)

There is a need for systematic maintenance of main arterial forest roads in order to efficiently and safely remove harvested forest products.

Infrastructure

The revised plan needs to provide direction on how forest management of infrastructure investments should be prioritized given varying funding levels of money and a portfolio of deteriorating infrastructure and increasing initiatives of sustainability.

There is a need for the revised plan to provide management direction regarding sustainability of deteriorating infrastructure that has archeological significance.

There is a need for the revised plan to be responsive to changing trends with regard to services, activities, and types of facilities required for mission delivery, balanced with fiscal reality (workforce capacity for operation and increasing maintenance costs).

NEW!!

There is a need to include plan direction to address transportation infrastructure, including reclaiming unneeded routes. (See above in restoration.)

There is a need to make the transportation system more ecologically and fiscally sustainable and to move the agency towards achieving the minimum road system.

There is a need for ATV cattle guards to replace gates that are never closed, left open, cattle guards that are more efficient. Plan need to be efficient, economic.

[There is a need to] extend range of partnerships to maintain infrastructure.

[There is a need for] the plan to accommodate better cattle movement through additional cross fencing and water points.

[There is a need for] management of infrastructure needs to be more equitable and prioritize given varying levels of funding and a portfolio of deteriorating infrastructure.

There is a need to create a reliable protocol to involve grazing permit holders when decommissioning or disinvesting infrastructure that affects allotments in the Cibola (see also INFRASTRUCTURE needs for change).

There is a need for change in the forest management plan to include regular maintenance of known springs and tanks.

There is a need for more water pipelines, and more efficient drinkers.

The need for change here is, cross fencing pastures, and doing away with ALL TEXAS GATES, and installing cattle guards, for car, truck, ATV traffic and to facilitate better management of stock within smaller controlled pastures that allow for more rotations of stock.

There is a need for the revised plan to consider and to allow for use for operation, development and maintenance of previous, existing and future facilities around the Forest.

Lands and Boundaries of the National Forest

The revised plan needs to provide direction for the process of obtaining legal road access to the mountain ranger districts, access that meets public, private landowner, and management needs.

There is a need to ensure the revised plan direction accurately reflects the essence of the 2008 Land Adjustment Strategy, aiming for contiguity of the land base and reduction of small unmanageable tracts. There is a need for tracts acquired in the past 29 years to be assigned to a management area, and to provide plan direction for how to assign future land acquisitions.

Complete up-to-date marking of national forest boundaries appears unattainable; a situation that can result in problems such as timber trespasses or encroachments. There is a need to provide plan direction for boundary line maintenance that recognizes some areas are at greater risk for trespass and encroachment than others.

NEW!!

There is a need to provide informal resolution opportunities regarding access issues. Consider mediation and arbitration to resolve issues.

Change above: to be broader so that it applies to any conflict, not just issues.

There is a need for the revised plan to recognize and plan for the complexities of managing Sandia District adjacent to the City of Albuquerque including the costs associated with gang vandalism, crime, land management by the City of Albuquerque, and speeding motorcycles on the Crest Highway. The complexity of fighting fires on or close to Kirtland AFB in areas where there are still unexploded armaments needs to be addressed.

There is a need to define what uses are allowed or suitable for the different land types and conversely what is not allowed or suitable. Specifically, the new plan needs to identify what land types and areas are (or are not) suitable for military training; which occurs in all four Ranger Districts not just the withdrawn area in the Sandia RD.

In regards to reconsidering the management area scheme numbers, arrangement, boundaries, etc., there is also a need to consider a land management zone designation or course filter for military training that occurs in all four Ranger Districts (not just the withdrawn area in the Sandia RD). At a bare minimum, there is a need to clarify in the Management Area Standards and Guidelines where this type of land use is (is not) acceptable.

There is a need to remove language included in the 1985 Plan so that the new plan does not conflict with or infer anything other than the legal requirements set forth in the withdrawal

document. The 1985 Plan, Appendix C reads: “Analysis Area 31, for the military withdrawals in the Sandia Ranger District, states the instrument of withdrawal designated the primary use as military but did state that the Forest Service would retain timber management rights and responsibilities. It also states other National Forest activities are authorized as long as these do not interfere with military use. This is not correct. The DOD instrument of withdrawal document, Public Land Order 995, does not specifically state what management/ authorization rights, responsibilities and activities belong to the Forest Service. The responsibility and authorization remain with the Department of Defense. The Department of Defense will manage, coordinate and collaborate with the Forest Service and others as needed.”

Geology, Minerals, and Energy

There is a need for the revised plan to update and/or clarify plan direction regarding recreational metal detecting, mineral collection, and gold panning.

NEW!!

[Suggestion: delete above paragraph and substitute the following] There is a need for the revised plan to follow provisions of the Mining Act of 1872, that authorizes and governs prospecting and mining for economic minerals, such as gold, platinum, and silver, on federal public lands.

There is a need for the revised plan to utilize and maintain the Forest Service Minerals databases for Locatable, Leasable and Salable minerals and to coordinate with industry and other State and Federal Agencies that manage mineral resource data.

There is a need to update plan direction to address potential commercial oil, gas, and hardrock mineral exploration and uses so that those operations will be planned, conducted and reclaimed as to minimize adverse environmental impacts. There is also a need for the revised plan to provide direction on the noncommercial use of common mineral materials so that other resources can be adequately protected.

There is a need for the revised plan to contain plan direction for providing Cibola Forest minerals and geology program information to the public, including interpretive geology and information on locatable, leasable, and salable minerals, landscape rock sales, prospecting, and fossil hunting.

There is a need for the revised plan to provide plan direction in anticipation of potential proposals for transmission corridors and alternative energy generation, including wind, biomass, and geothermal, while protecting natural resources, heritage and sacred sites, and scenery.

NEW!!

There is a need to include plan direction in anticipation of potential proposals for transmission corridors and renewable energy generation.

[There is a need to] address uranium as a specific item.

There is a need for the Forest Plan to specifically delineate the FS position on fracking on the Cibola NF.

There is a need to update plan direction to address potential commercial oil, gas, and hard rock

mineral exploration and uses.

There is a need to recognize the importance of existing, and possibly future, utility corridors in facilitating the expanded utilization of energy sources including wind, solar, and biomass throughout New Mexico.

Because of the proximity of the Cibola National Forest to New Mexico's largest metropolitan area, there is a need to reflect the importance of timely and immediate maintenance activities associated with existing energy and communication corridors for safety reasons.

There is a need to maintain access to utility corridors and communication facilities in a manner that does not open the ROW to motorized public access.

There is a need to include the full cost of an environmental impact analyses for uranium mining activity and uranium mineral exploration. Full cost includes taking into account, and including measuring pollutants and harm to local communities, clean up and health costs to local communities of mines.

[There is a need for] USFS to reach out to industry organizations who may be directly impacted by (are stakeholders) in the Forest Plan. Includes NMOGA, NM Mining Association, Chamber of Commerce.

There is a need to develop avenues for private businesses to mine and produce aggregate products for public sale and FS road maintenance.

There is a need for the revised plan to acknowledge that modern mining reclamation practices can restore disturbed areas to as good or better than pre-mining conditions (the San Mateo Mine and JJ#l as discussed in the Roca Honda DEIS are good examples).

There is a need to acknowledge that legacy mine sites cannot occur under modern mining laws/regulations that require reclamation and irrevocable performance bonds.

There is a need to acknowledge that the 1872 Mining law has been amended hundreds of times, mostly through case law, and gives agencies, including the USFS, broad powers to regulate virtually all aspects of mining and reclamation on public land through either denial of Plans of Operations or imposition of conditions in plan approvals.

There is no need to treat uranium any differently than other minerals subject to the locatable mineral regulations or .engage in conjectural speculation about potential effects of future mine development on the CNF as each mine would be subject to a full blown NEPA analysis, including possible cumulative effects. There is a need to acknowledge that the percentage of public land available for mineral entry has steadily decreased over last 30-40 years due to various withdrawals such as designation of ACEC's, SMA's, roadless areas, wilderness areas, etc. The amount of land withdrawn for such reasons within the CNF needs to be clearly identified and stated in the revised plan.

There is a need to present a full analysis and discussion of environmental impacts from "renewable" energy projects so that the public has a better understanding of the very real environmental impacts such projects have. The U.S. Fish and Wildlife Service has acknowledged

that wind power generation facilities (i.e. wind "farms") kill hundreds of thousands of birds every year including endangered species, eagles and raptors, as well as hundreds of thousands of bats. The amount of energy produced from solar and wind power generation facilities per unit of disturbance (e.g. acres of land or numbers of wildlife casualties/years of operation, etc.) should be presented and compared with conventional energy development projects like uranium and coal mines.

There is a need to fully evaluate the ecological sustainability of renewable energy facilities including the amount of energy used and carbon footprint created by procuring, transporting, manufacturing and constructing large scale industrial facilities in previously un-disturbed lands.

There is a need for the revised plan to use actual data and valid research (CH. 9, pg. 242). As stated previously the only known, proven health problems from "legacy mining" were increased lung cancer rates (and mortality) among miners who worked in underground mines before they were properly ventilated and regulated. There is NO basis for the statement that "releases of uranium or radon gas from remaining contamination also have had serious health effects on the human environment"; this statement is flat wrong, and inflammatory. There needs to be a clear distinction between speculation about possible health and safety effects and what is known from peer-reviewed, credible scientific epidemiology studies, such as the Boice study previously cited.

There is a need for the plan to distinguish between mills and tailings facilities. The Forest Service needs to acknowledge that partially closed and abandoned tailings facilities are subject to regulatory requirements of EPA, NRC and DOE. The entire discussion on page 242 (Volume I, Chapter 9) is very misleading.

There needs to be acknowledgement of improvements in safety and environmental protection practices in the mining industry over the past 30-40 years. The uranium industry is not "addressing the occupational issues" as stated on pg. 242- it HAS addressed them. There are numerous examples of "modern" uranium mines where radiation exposure levels to workers, including underground miners, have proven to be well below allowable limits over the life of the mine, and comparable to radiation exposure levels that the general public receives every day. There are also many examples of uranium mines that have been planned, operated and reclaimed in such a manner that environmental impacts have been minimal to undetectable, and reclamation to pre-mining conditions or better has been accomplished. Judging the performance of the modern mining industry by the largely unregulated practices of the past is like judging the safety of modern cars by those built in the 1950's. Cars then did not have seat belts, safety glass windshields, built in roll cages, steel-belted tires, anti-locking brakes, air bags, etc. all safety measures that we now expect and demand. The same is true for the mining industry; there are now stringent environmental and worker protection laws and standard practices in the mining industry that prohibit the sort of practices that were once considered acceptable. In fact, uranium mining and milling are among the most highly regulated industrial activities in the U.S.

There is a need for the plan to acknowledge that the State of New Mexico, with the assistance of the uranium mining companies, has compiled an inventory of abandoned uranium mines (AUMs) in New Mexico, and that remedial actions have been or are being taken to mitigate the highest priority sites.

There is a need for the all Forest Plan documents, not just the revised plan, to clearly

differentiate between what was done and allowed in the mining industry (not just uranium) 50 or 60 years ago and what has been allowed from the 1970's forward with respect to worker safety and environmental protection practices.

There is a need for the revised plan to recognize the public access rights that historically or currently exist for mineral development and other uses of land in and near the Forest.

There is a need, if the revised plan designates any wilderness area, to ensure that it does not share boundaries with historical or existing mining operations or other industrial features.

There is a need for the revised plan to recognize and permit the development of mineral rights in the Forest.

There is a need for the revised plan to support growth of mineral development, which has provided historic economic growth to the community.

Conservation Education

There is a need for the plan to promote opportunities with volunteers and partners that will provide conservation education (including demonstration areas) regarding forest management; sustainable use level of non-timber forest products; recreation, and other multiple uses.

There is a need for a comprehensive education and outreach program dedicated to mitigating and decreasing invasive species on the Cibola.

Monitoring

There is a need for the revised plan to include an updated and realistic monitoring plan that is not inconsistent with staffing and funding resources to accomplish same.

There is a need to collect, analyze, and distribute survey and other monitoring data for grazing on a more consistent and reliable basis.

Research

There is a need for the revised plan to provide direction on opportunities to conduct research on the mountain ranger districts, regardless of whether proposed research would occur on a research natural area.

There is a need for the USFS to research ways to create or incentivize market-based approaches to reduce woody biomass in the Cibola.

Law Enforcement

NEW!!

There is a need for change in the enforcement of laws specifically dealing with littering. The amount of trash left on the Cibola National Forest is concerning.

[There is a need for the revised plan to] increase law enforcement on west side Manzanos.