



Native Plant Society of New Mexico
PO Box 35388
Albuquerque, NM 87176-5388

Steve Hattenbach, Forest Supervisor
Cibola National Forest
2113 Osuna Rd NE
Albuquerque, NM 87113

November 5, 2019

Dear Mr. Hattenbach:

The Native Plant Society of New Mexico (NPSNM), with seven chapters statewide and in El Paso, is grateful for the opportunity to comment on the draft environmental impact statement (DEIS) and draft land management plan (DLMP) for the Cibola National Forest that were released this past August. We have been active in the Cibola Shared Stewardship Collaborative and several of the district collaboratives, and we thank the Forest for allowing the involvement of regional stakeholders in this manner.

The Sandia Ranger District Collaborative arrived at several recommendations by consensus, and the NPSNM, as part of that process, supports those comments/recommendations. We generally support the Forest's preferred management alternative C with the caveats explained below. These consist of favoring the inclusion of items from Alternatives B and D regarding place-based management areas and wilderness expansion, plus a more direct approach to nonnative invasive plant species monitoring and control.

We strongly endorse the single, small wilderness expansion proposed for the Sandia district by alternative D, while recognizing a possible allowance for the proposed mountain bike perimeter trail. This area, known as Three Gun Spring or Tres Pistolas, is an area with exceptional wilderness characteristics and scenic integrity, considering its proximity to Albuquerque. Open grassland and foothills habitat in such good condition is rare in the Sandia district, in contrast to city open space on the west side of the range now largely degraded from high usage, erosion, invasive weeds, and excessive bicycle traffic. In addition to the dispersed and primitive uses typical in natural areas (LMP p.126), some special uses (p. 132) would be maintained and actually enhanced in the recommended wilderness such as opportunities for research, traditional uses such as herb collecting, and organized environmental education serving the metropolitan area. The NPSNM already makes use of this area by providing field experiences in plant identification, and we would like to continue enjoying its current botanical diversity.

The Three Gun Spring area proposed for wilderness recommendation is contiguous with existing Sandia Wilderness and is hardly used now for motorized transportation or even biking, therefore any social or cultural impact would be negligible. But the introduction of a perimeter bike trail will bring many new bicyclists into the area, with the inevitable development of a network of unauthorized, erosive user trails. We have worked with the East Mountain Regional Trails Council and the Albuquerque Mountain Bicyclists groups to compromise on a reduction

from the original 281 acre wilderness proposed in Alternative D to approximately 230 acres that allows a right-of-way below the boundary for a reasonably engineered perimeter bike trail.

By the same token, we lament the disappearance of the previously proposed Sandia Outdoor Education and Natural Area (2016 draft) from the current alternatives. Environmental education is a top priority for our organization, and even keeping such an area on the map piques public interest in experiencing and learning more about nature. It is tragic that the majority of students in Albuquerque Public Schools have never been camping and have no experience with the woods.

We also favor the recommended wilderness additions shown in alternative D for the Magdalena District in the San Mateo range to the extent of increasing the connectivity of unspoiled wildlife habitat between the Apache Kid and Withington wilderness areas. Decreasing habitat fragmentation in this way maintains a more fully functioning ecosystem and a genetic reserve of plants and animals alike.

The widespread restoration campaigns to be undertaken demonstrate the importance of preservation, or prevention, as an alternative to more expensive remediation after the fact. There are also some things that just cannot be restored once destroyed. So it is disappointing that alternative C dispenses with most Special Management Areas and Research Natural Areas (SMA and RNA). The Cibola contains some priceless areas whose special values are unlikely to be maintained by the one-size-fits-all prescriptions of the forest-wide direction and approaches. This is particularly true of the Little Water Canyon (LWC) riparian area in the Mount Taylor district.

Areas with intact riparian ecology have become extremely rare in the Southwest and LWC is one of the best examples that remain. We welcome its designation as Wild and Scenic, based on its exceptional botanical value. But the applicable standards for the W&S designation state that “valid existing rights shall continue to be exercised” (DLMP p. 143). This is at odds with the Forest’s stated commitment (DEIS p. 245) “to allow for these significant plant communities to persist, to maintain their unique characteristics.” The DEIS expresses concern for the single LWC grazing permittee’s ability to fully use his newly acquired allotment (he already had an additional allotment) if cattle are kept from the stream, while inadequately acknowledges only the risk of soil compaction to the plant community if the cattle remain.

Our volunteers have already been finding more than compaction of soil by cattle in the prime riparian area, and wetlands are well known to suffer from herbivory, water siltation, stream bank erosion, nutrient overloading, decreased wildlife usage and other ills from habitual use by livestock. In fairness to the permittee, we think that a water well and trough developed below the prime habitat area would be money well-spent by the Forest Service if the allotment is to remain active. The DEIS bibliography provides a reference that shows cattle will actually prefer such a water source by 92%, possibly circumventing the recourse to fencing: **Sheffield, R.E., S. Mostaghimi, E.H. Vaughan, E.R. Collins Jr., and V.G. Allen. 1997. Off-stream water sources for grazing cattle as a stream bank stabilization and water quality BMP. Transactions of the ASAE 40: 595-604.**

In short, the NPSNM strongly urges the management of LWC as a RNA, or at the minimum to mitigate the conflict with grazing interests by providing an alternate water source such as a well.

In general, the absence of Special Management Areas and Research Natural Areas makes places of significant value or fragility disappear from public awareness and institutional (FS) memory. Even if budgetary or staffing shortages prevent special management to take place today, at least maintaining an inventory that notes the existence of these places, providing for periodic monitoring, will allow for future attention, including the efforts of willing nonprofit groups under USFS guidance.

The DEIS and DLMP make multiple mentions of the need to minimize the spread of nonnative invasive species. The Forest-wide Direction lays out excellent guidelines (FW-GDL-NIS) and approaches addressing this challenge, but the plan is short on specifics. Examples are given for specific threats to fish and wildlife, but sadly lacking is acknowledgement of specific nonnative plants that stand to permanently transform the ecology and fire regime of the forest and range as they have increasingly done elsewhere.

With the emphasis on thinning and prescribed fire use in alternative C, it is especially important that there be a focus on pre-treatment surveys for cheatgrass (*Bromus tectorum*) in the vicinity of treatment areas.

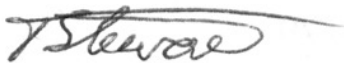
We call your attention to a reference that does not appear in the DEIS bibliography but has direct relevance to the threat of cheatgrass invasion in ponderosa pine forests of the Southwest: **McGlone C, Springer J and Covington W (2009) *Cheatgrass encroachment on a ponderosa pine ecological restoration project in northern Arizona*. *Ecol Restor* 27: 37-46.**

As this nonnative can create a virtually permanent, fire-prone monoculture, nearly useless for grazing, the LMP should specifically call for scrupulous, expert monitoring for *B. tectorum* for several growing seasons following any treatment until desired understory conditions return.

Chapter 5, Monitoring and Evaluation, in the present DLMP requires that managers choose one among three questions to monitor for ecological conditions (Table 30, page 175) after forest treatments. Only one of these questions (FW-DC-NIS-01) refers to invasive species. While all three questions are significant, monitoring for invasive species should be mandatory SOP and not left up to an individual's possible judgement to ignore until it becomes too late.

Thank you again for this opportunity to comment. We do appreciate the years of work the Forest Service has put into this plan revision process.

Best regards,



Tom Stewart,
State Board President,
Native Plant Society of New Mexico