

NORTHERN NM NFS PLAN REVISION OBJECTION RESOLUTION MEETING

MARCH 15, 2022

RANGE MANAGEMENT AND ITS IMPACT ON WATER AND RIPARIAN RESOURCES

ADAPTIVE MANAGEMENT – ALL FORESTS

The objectors contend that the Plan does not comply with law or policy for adaptive management because an adaptive management plan for grazing was not developed at the programmatic level.

OBJECTORS:

Center for Biological Diversity – Todd Schulke

Western Watersheds Project – Cyndi Tuell

REMEDY(S) PROPOSED BY OBJECTORS

TODD SCHULKE - CENTER FOR BIOLOGICAL DIVERSITY

Prepare a Supplemental EIS, provide an adaptive management plan that meets legal, regulatory, and scientific requirements." "Thus, one simple way for the Carson to better contribute to resolving this issue at the regional scale is to provide a plan component (a standard, guideline, or management approach) that expresses a commitment to conduct habitat monitoring within a conservation management framework and that relates it back to authorized grazing."

CYNDI TUELL - WESTERN WATERSHEDS PROJECT

Add the following language regarding adaptive management:

- Consider an adaptive management approach to manage rangelands in a manner that promotes socioeconomic wellbeing and stability of local communities, ecosystem resilience, sustainability, and species diversity, based on scientifically quantified changes to rangelands. An adaptive management approach is designed to provide more flexibility to grazing management, while improving or maintaining the health of rangelands. The adaptive management approach should include consideration of voluntary permit retirement.

Todd Shulke: Letter lays out legal concern. Adaptive Management is challenging. One really important piece is the monitoring approach for grazing. The primary approach used by Forest Service is utilization monitoring. The reliance on utilization is inadequate and many staff agree. Our proposed protocol for riparian areas is souped up evaluation of Properly Functioning Condition (PFC). We do not have a good vision of exactly what it should entail but would like to explore how to do better monitoring and to explore a myriad of other important questions. Our concern levels are high, and that is reflective of last few years. It needs an expedited approach, but I'm not sure what that looks like.

Cindy Tuell: Our objection speaks for itself. Adaptive Management should consider voluntary permit retirement. We have been asking for this at every level, but it is consistently rejected. I have nothing else to add.

Steve Hattenbach- The Forest Plan holds a special space in the monitoring framework. Plan and project-level monitoring have different types of questions. The Forest Plan does not include questions best addressed at site specific/project level, decisions are made about frequency, location, and type are often deferred to project-level. It may feel lacking when you are just looking at the plan. Plan/program level should be looking at trends over the entire area, particularly with listed species and accountability. The Forest Plan is the perfect place for that.

GIVE INTERESTED PERSONS THE OPPORTUNITY TO PROVIDE INPUT

Lucia Sanchez- Rio Arriba Country Adaptive management is a balance. It has to go not just with cattle, but all ungulates (elk). Retiring permits not on table as far as Rio Arriba is concerned. There is finite land available, most of the land here is federal land that can never be purchased. The idea of retiring permits is not consistent with taking care of the people.

Bill Gooch, outdoor enthusiast, climbing instructor: I echo previous comments on voluntary grazing retirement. There is legislation being introduced to allow for it.

TRESPASS LIVESTOCK – ALL FORESTS

An objector states the Forest Plan Revision and EIS do not consider or analyze the effects of frequent unauthorized grazing by permittees through livestock trespassing beyond allotment boundaries.

OBJECTOR:

Western Watersheds Project – Cyndi Tuell

REMEDY(S) PROPOSED BY OBJECTOR

1. The Forest Service cannot rely upon this EIS as it relates to livestock grazing management because an important aspect of livestock grazing (ubiquitous trespass) was not considered. This deficiency and incorrect assumption must be corrected. The Forest Service has acknowledged that trespass or unauthorized livestock are a well-known problem on Forest Service managed lands.
 2. We request that information and documentation related to trespass be included in the analysis. Grazing Analysis
-

Cindi Tuell: I have nothing to add.

Steve H.: We recognize that trespass and unauthorized livestock is an issue, but not sure the plan is the right place to address it.

James Duran asked about specific allotments concerns: If there are places where we are seeing fences cut, we will follow up.

GIVE INTERESTED PERSONS THE OPPORTUNITY TO PROVIDE INPUT

Susan Ostlie, Grand Ol Broads: Trespass cattle are an issue in Little Water Canyon and are heavily impacting resources. The permittee is working with a volunteer group. There is a particular issue at San Antonio Creek where cattle are coming from Forest Service lands in Jemez.

Dave Sanchez: New Mexico is a “fence out” state. It is complex, but falls in hands of Forest Service for fencing out cattle. It is hard to maintain fences in mountain country. Elk destroy fences and it is difficult to keep up with the fence damage on Carson.

LIVESTOCK PROTECTION FROM PREDATORS – ALL FORESTS – 20 MINUTES

An objector disagrees with the lack of specific measures for livestock protection from predators and range improvement.

OBJECTORS:

Western Watersheds Project – Cyndi Tuell

REMEDY(S) PROPOSED BY OBJECTOR

Require the following of all allotment holders:

1. Removing, destroying, burying, or placing electric fencing around dead livestock discovered on allotments if carcasses would attract predators into high use areas such as currently grazed meadows, salting grounds, water sources, or holding corrals.
2. Removing sick or injured livestock from grazing allotments to prevent them from being targeted by predators.
3. Increasing range riding to provide a more consistent human presence around your cattle. This has proven to be one of the most effective means for reducing predator-livestock interactions and depredation.

All AOIs should include a notice to grazing permittees that they may take conservation non-use for the sake of reducing livestock-predator conflicts on these allotments, pursuant to the Forest Service regulations at 36 C.F.R. 222.3 Issuance of grazing and livestock use permits 36 CFR 222.3 Issuance of grazing and livestock use permits(C)(1)(iv)(D); Forest Service Handbook 2209.13(17.2) Nonuse for Resource Protection or Development.

Cindi Tuell: Western Watersheds has been working for years to get direction to permittees, but there are never any changes. Predators don't have anywhere to go.

Michiko asked a clarifying question about what predators in particular.

Cindy Tuell: Mostly mountain lions, bears, and coyote for northern NM. It is a different issue down south on the Lincoln and Gila.

Michiko: I am trying to understand magnitude of the issue. What are indicators? How did it come onto your radar as an issue?

Steve H.: There are practical issues about how to accomplish this. It's very hard to know when an animal has expired. Often it's too late. Animals are often in remote and rugged areas that are not easily accessed.

GIVE INTERESTED PERSONS THE OPPORTUNITY TO PROVIDE INPUT

Arturo Archuleta, NM Land Grant Council: I have concerns about potential remedies for Wilderness Recommendations and its impact due to implementation. One of challenges and limitations with Wilderness is accessing herds. Travel management also makes accessing hard with no mechanized or motorized vehicles. We did comment that we needed vehicle access for retrieving sick or injured cows. Retrieval of dead animals would be very hard to implement.

RIPARIAN AREA CONSIDERATION – ALL FORESTS –

Objectors disagree with existing permitting of allotments with limited grazing restrictions to protect riparian areas.

OBJECTORS:

Center for Biological Diversity – Todd Schulke

Western Watersheds Project – Cyndi Tuell

REMEDY(S) PROPOSED BY OBJECTORS

CYNDI TUELL - WESTERN WATERSHEDS PROJECT

- In order to remove ecological stressors in the form of non-native livestock, we support the installment of additional and extensive livestock exclosures in riparian corridors.
- Suggested change in plan language: Livestock grazing within riparian management zones (e.g., along streams, around seeps, springs, lakes, and wetlands) should be managed SHALL BE PROHIBITED to sustain proper stream channel morphology, floodplain function, and riparian vegetation desired conditions.³ New livestock troughs, tanks, and holding facilities should SHALL be located out of riparian management zones (e.g., along streams, around seeps, springs, lakes, and wetlands), to protect riparian ecological resources, unless necessary for resource enhancement or protection.⁴ New range infrastructure (e.g., troughs, tanks) should SHALL be designed to avoid long-term negative impacts to soil resources (e.g., soil compaction and soil loss), to maintain hydrological function outside the structures' footprint.

TODD SCHULKE - CENTER FOR BIOLOGICAL DIVERSITY

- Revise the plan so that it: "(1) manages riparian area restoration projects in tandem with limits on livestock grazing, and correctly acknowledges it as the number one threat to riparian health; (2) reviews site-specific information about the nature of at-risk streams and the identifies specific projects meant to improve those streams; (3) provides management approaches as enforceable Standards or Guidelines, with robust monitoring requirements, and (4) utilizes the best available science to support and guide conservation and the Duty to Conserve."
- In response to new climatic conditions, actions that support riparian function and allow for recovery should be required at the programmatic level across the board.
- We urge the Forest Service to consider an expanded PFC as more of an ecosystem analysis process, one using thoroughly trained and consistent observers who make detailed and, where possible, quantitative, field observations and measurements, and who compare their results against similar measurements made at control (reference) sites.

Cindi Tuell: I have nothing to add.

Todd Shulke: The system to protect riparian areas is broken. Need to consider exclosures at the programmatic level. Remedy is really about coming up with an agreeable monitoring issue. I am not sure if the Forest Service even knows the extent of the trespass issue. Center for Biological has a rapid assessment tool for looking at impacts and presence/absence. I urge us to figure out ways to work together to develop a monitoring plan to address the issues.

Michiko asked James Duran to define trespass vs. non-compliance.

James Duran: Trespass are animals owned by someone without a permit. Non-compliance is when animals are permitted but are outside timing or location.

Steve H.: We differentiate because the enforcement mechanisms are different.

Michiko clarified that instructions to the Forest Service will have language specific to agency and appropriate action/enforcement.

SHUREE CANYON PASTURE – CARSON NATIONAL FOREST –

An objector disagrees with Forest Plan Chapter 3, page 11 which identifies the Shuree Canyon Pasture as a trailing pasture because multiple district rangers have told the objector the pasture can be used.

OBJECTOR:

Mark Torres

REMEDY(S) PROPOSED BY OBJECTOR

Allow the permittee to use the Shuree Canyon Pasture

Mark Torres, Permittee on Valle Vidal: Have four pastures in rest rotation and move through Shuree Canyon. Over the years, various rangers have authorized use without a specific time to move through. We never had this rule before. Want to know what the future looks like.

Michiko: Clarification, Shuree Canyon is used to transition, for moving through, and your concern is about time limitations?

Mark Torres: Concern that never had rule before.

Peter Rich: There are (Proposed?) Research Natural Areas in the pasture, which is probably why it was only used for trailing.

Michiko: We will need to be clear about the restrictions and define what we mean by “trailing”.

WETLAND JEWELS – CARSON NATIONAL FOREST – 20 MINUTES

An objector was disappointed the "wetland jewels" were not designated for protection and feels these areas will not be protected.

OBJECTOR:

Carson Forest Watch – Joanie Berde

REMEDY(S) PROPOSED BY OBJECTOR

Designate the Wetland Jewels Management Area into the final decision.

Joanie Berde unable to attend. No further discussion.

BIGHORN SHEEP SPECIES OF CONSERVATION CONCERN OBJECTION – CARSON NATIONAL FOREST –

This topic is handled by the WO. See Jody’s SCC review package. Bernie Gyant, Associate Deputy Chief, National Forest System is the reviewing officer.

Western Watersheds Project contends that by including species-specific plan components without acknowledging the concern for persistence driving the inclusion of those components, the Forest is sidestepping its obligation to manage habitat conditions to ensure the continued existence of bighorn sheep herds on the Forest, in violation of 36CFR 219.9. The objector believes that the sheer fact that the forest provided plan components such as standards and guidelines, is proof that the bighorn sheep should be on the Species of Conservation Concern list (SCC).

OBJECTOR:

Western Watersheds Project - Cyndi Tuell

REMEDY(S) PROPOSED BY OBJECTOR

The objector would like bighorn sheep listed as a species of conservation concern (SCC).

Melissa Cain

- *Carson analysis did not address 2018 New Mexico Game and Fish email that pointed out factual errors. Email was sent to Forest. They should have it because Western Watersheds received it via FIA request.*
- *Forest analysis said it considered input from adjacent tribes, but only cited Navajo Nation. Navajo is not adjacent, but Toas Pueblo is. Should have considered Toas Pueblo.*
- *FEIS lists potential contact of sheep on private land outside management control, but Planning Rule says to consider species even when threats exist off-forest. When threats originate off Forest Service lands, forest should document why not within its control, but it is not a reason for excluding it.*
- *SCC criteria also says to consider lists on adjacent Forests. Rio Grande did have Big Horn sheep on its SCC list.*
- *Risk of contact model used for Carson was qualitative model with factual errors. Carson should have used risk of contact model used across west, which is BASI.*
- *There was a disease event in the last couple years. Tests showed disease was goat strain, not sheep. Fortunately, it did not spread.*

Barney Gyant: Can I get a sense of the habitat?

Alyssa Radcliff: There are five populations on the Carson, four in alpine tundra with cliffs and rocky features, one in the Rio Grande Gorge, also with cliffs and rocky features. The population was introduced in 2103 and has done well since then.

Greg Dyson: WildEarth NM, and other groups are tracking issues and have concerns about SCC. They are watching closely. It is important for Big Horn to be on list because it offers more opportunities for protection. When not on list, the forest's feel their hands are tied when dealing with Big Horn issues.

Barney, reiterating back to Greg: I am hearing that there are places across west where people feel their hands are tied with regard to Big Horn?

DISEASE RISK TO BIGHORN SHEEP – ALL FORESTS – 30 MINUTES

New Mexico Hunters and Anglers and Western Watersheds project asserts the Responsible Official adopt a strict policy of no domestic sheep grazing in bighorn sheep areas. Another objector questions the science behind statements in EIS regarding permit conversions and management of sheep allotments. Another objector disagrees with proposed measures to protect native bighorn sheep from disease carried by domestic sheep. She cites multiple studies show

that native sheep foray beyond their recognized occupied habitat and are at risk for contacting disease pathogens in their forays if domestic sheep have access to the foray areas.

OBJECTORS:

Michael Farrington– NM Chapter of Backcountry Hunters and Anglers

Cyndi Tuell – Western Watersheds Project

REMEDY(S) PROPOSED BY OBJECTORS

MICHAEL FARRINGTON - NEW MEXICO CHAPTER OF BACKCOUNTRY HUNTERS AND ANGLERS (CARSON)

Adopt a strict policy of no domestic sheep grazing in bighorn sheep areas.

CYNDI TUELL - WESTERN WATERSHEDS PROJECT

- Adopt a strict policy of no domestic sheep grazing
- Convert domestic sheep permits to cattle permits where bighorn sheep occur
- Do not allow cattle permit conversion to domestic sheep where bighorn sheep occur.
- Manage domestic sheep permits to prevent the transfer of disease to bighorn sheep.
- Cibola Plan Revision: Modify standard FW-STD-GR-4 to exclude domestic sheep and goats for weed control purposes near bighorn sheep populations.
- Santa Fe Plan Revision: The USFS should make FW-RANGE-G-8 a standard and amend it to prohibit the authorization of domestic sheep and goats near bighorn sheep populations.

Melissa Cain: Carson has a Desired Condition that risk of disease transmission is low, but that is not the current situation. One herd is at risk. There are other risks from BLM and private lands. There are no standards that would allow for achievement of the Desired Condition. Sheep are gregarious. We know there is an attraction between domestic and wild sheep. Domestic and wild populations stray. Sheep must be managed to prevent intermingling. Sheep are gregarious and should not be authorized in high-risk transmission areas.

The plan lists methods of prevention: fences, herding dogs, vaccinations etc., but none of these work. Courts recognize these do not prevent contact in high-risk areas. This standard is ineffective in actually achieving desired condition.

Michiko asked for definition of term “gregarious animals”.

Melissa: They are friendly and seek companionship with other animals, even with other closely related species. Usually found in flocks.

Michiko: I want to make sure I understand, you are saying that there is no scientifically supported strategy except for separation?

Melissa: Yes, refer back to Partridge Creek Case. There are no studies that back up/support that the methods in the plan work. Carson not using current population data. Rio Grand gorge herd. 2018 email sent to Forest Melissa received from FOIA. Forest Service developed model used across the West, but the Carson used a qualitative assessment.

Michiko invited Melissa to provide additional references and citations not previously submitted.

GIVE INTERESTED PERSONS THE OPPORTUNITY TO PROVIDE INPUT

Ralph Vigil: Many generations of traditional use. We recently had battle with WildEarth so we could get our firewood. Traditional communities need to be at the table if it effects grazing. I have a Spanish father and native mother. Grazing has big black eye because people don't understand it. There has to be a balance. Decision affects traditional uses and traditional communities. I am one of the biggest proponents for fighting against degradation. I am active with trying to protect waters from mining. We need to be involved in the conversation. We have a huge stake in it.

Melissa: There is one high risk domestic sheep allotment. The allotment authorized affecting risk is not part of indigenous community and the permittee does not belong to a traditional or native community.

Lucia Sanchez: Land Grant community has a long time use of sheep for food and fiber. Shepherds are rarely without their flock. No responsible livestock owner will let them wonder off. There are generations of families that validate how economically and cultural viable the way of life is. They don't want to lose sheep from disease or predators. You should consider peer reviewed literature from land grant Universities, (NM State).

Ralph Vigil: Agree with Lucia. Need to get us all at the same table to figure out how to maintain balance. Feels like they are trying to get us off the land. We are not making much money. We do it because we love it. It is how we feed our families. We need to shorten the food chain. We need to think about sustainability and producing of our own food.

THREATENED AND ENDANGERED SPECIES — ALL FORESTS

IMPACTS TO MEXICAN SPOTTED OWL FROM MECHANICAL AND PRESCRIBED FIRE TREATMENTS – ALL FORESTS –

Objector contends that while extensive high-severity fire can sometimes negatively impact MSO, the assumption in the Revised Plan and FEIS that high-severity fire is a universal threat to MSO, and that logging is not a threat, is incompatible with MSO recovery and disregards the full range of the best available science.

The objector contends that the Forest Service doesn't have a clear tool or method to analyze impacts to MSO from logging and instead leaves decision making up to district level silviculturists post-NEPA, even though emerging science questions the effectiveness of mechanical treatments in MSO habitat. They allege this approach violates NEPA's mandate to take a hard look at the environmental consequences of the individual projects to the Mexican spotted owl.

OBJECTOR:

Center for Biological Diversity – Todd Schulke

REMEDY(S) PROPOSED BY OBJECTOR

Provide a framework to assess the effects of mechanical and prescribed fire treatments on the owl and its habitat in PACs outside of core areas. Evaluate the full range of best available science on the effects of fire and logging on MSO.

Provide an effects analysis that recognizes the threats posed by logging and associated road construction.

MEXICAN SPOTTED OWL STANDARDS AND GUIDELINES – ALL FORESTS – 18 MINUTES

Objector contends the revised plan does not include any Standards or Guidelines or Monitoring Plan components to ensure that the needs identified by the Forest Service will be met, which clearly demonstrates that the plan fails to provide a program for MSO conservation. Without specific Standards or Guidelines to instruct managers to retain old and large trees,

adequate canopy cover, dwarf mistletoe brooms, or sufficient downed woody debris or snags, these Desired Conditions do not provide satisfactory safeguards and as such the plan fails to provide the ecological conditions necessary to contribute to Mexican spotted owl recovery. They also claim the Revised Plan fails to utilize the best available science in regard to retention of old and large trees, in violation of NFMA and NEPA (36 CFR 219.3, 36 CFR 219.9(c), 36 CFR 219.14(a)(4), and 40 CFR § 1500.1(b)).

OBJECTOR:

Center for Biological Diversity – Todd Schulke

REMEDY(S) PROPOSED BY OBJECTOR

- Provide Standards and Guidelines to ensure that Recovery Criteria metrics (both occupancy rates and habitat conditions) are incorporated and followed in any forest management activities affecting the MSO.
- Do more to identify and protect owls; the Revised Plan needs to include, as a standard, direction to conduct protocol occupancy surveys prior to commencement of ground-disturbing activities within Recovery Habitat, along with direction to minimize harm and harassment to Mexican spotted owl individuals in project areas that reside outside of currently known PACs.
 - The standard should direct that if surveys cannot be completed, the unit will assume owl presence within the project area not surveyed, plus a buffer of 0.50 miles. The specific buffer makes this component more appropriate as a standard, but should the agency elect to incorporate it as a guideline, the buffer should still be included as a standard. Include standards or guidelines that provide better protections for old and large trees, canopy cover, and higher basal area in recovery habitat.

Todd: Standards and Guidelines from the recovery plan should be considered minimums and we shouldn't be managing for minimums. The key outcomes of leadership forum and agreements should be included in the plans. Where does the guidance live if it is not in the plans? Template is probably most important piece. Need tools and methods for analyzing impacts. Surveys should be done very early in the planning process because it tells where we can work. If one were to read the plan, I don't think most people would necessarily have the full picture of potential impacts.

Michiko: What are some good examples? Help me understand what that looks like.

Todd: There is a lot of good data for Northwest, but not southwest. Joe Ganey, Shaula Hedwall are the experts. They were both doing studies to determine effects that would be the bones of that framework. Not sure the status of those.

Michiko: I heard that you want a more direct incorporation of reference of prior agreements into Forest Plan. Also, if there is a scientific basis for the half-mile buffer and assumption about presence, please send citations.

NEW MEXICO MEADOW JUMPING MOUSE – SANTA FE NATIONAL FOREST –

PLAN COMPONENTS FOR NMMJM – SANTA FE

Objector contends the Revised Plan does not contain an adequate set of plan components that will provide necessary ecological conditions and habitat stressor and threat mitigation to achieve this essential aims. Thus, the Revised Plan does not meet the requirements of 36 CFR 219.9(a)(1) and 36 CFR 219.9(b)(1). “Appendix E included almost 200 plan components it indicates are applicable to the jumping mouse. Appendix E includes 30 Management Approaches that apply to the NMMJM—incorrectly indicating that they are plan components; they are not, and the Forest Service is not under an obligation to abide by them. It's not always clear how some of these listed plan components are relevant to the jumping mouse”

OBJECTOR:

Center for Biological Diversity – Todd Schulke

REMEDY(S) PROPOSED BY OBJECTOR

Suggested Guideline re-wording:

FW-RWE-G-4: Plantings to reestablish native riparian vegetation should use local sources and occur only if natural regeneration is not sufficient to provide shading, bank cover, and streambank stability. For seeding, only certified, weed-free native seed mixes of local species varieties should be used when commercially available. This is important direction, but it should be a standard. We see no other alternative paths that enable meeting the intent of this direction.

FW-RANGE-G-5: Salting or mineral supplementation should not occur on or adjacent to areas especially sensitive to salt and increased ungulate traffic (e.g., riparian areas, wetlands, archeological sites, and at-risk species present) to protect these sites. This should be a standard

that simply prohibits salt and mineral supplements in riparian areas, wetlands, and occupied, suitable, or potential recovery habitat for the jumping mouse. We do not see how departure from the guidelines can result in achieving the intended result: keeping salt and minerals from polluting sensitive areas, including NMMJM habitat. Change the "should" to a "shall" and make it a standard.

NMMJM RECOVERY – SANTA FE –

Objector alleges violations of 40 C.F.R. 1502.14, 1502.13 and 1502.16 because the FEIS and other relevant plan documents have failed to demonstrate how the specific plan components in the Revised Plan will directly or indirectly affect the NMMJM and the species' critical habitats, potential restorable habitat, and connectivity habitat - beneficially or adversely.

OBJECTOR:

Center for Biological Diversity – Todd Schulke

REMEDY(S) PROPOSED BY OBJECTOR

Any subsequent NEPA document prepared during the forest plan revision process must include the best available science cited here (at a minimum) that documents the impacts of livestock grazing on the New Mexico meadow jumping mouse and the ecological integrity of its riparian and adjacent upland habitats.

Plan components must eliminate livestock grazing from jumping mouse occupied, suitable unoccupied, and potentially recoverable habitat FW-RWE-G-7: Herbivory of riparian plants should not cause long-term trends away from desired riparian conditions. The intent of this guideline is important. However, it doesn't provide any real management guidance for forest personnel. Moreover, this direction should be a standard.

As one of the most severe threats to the NMMJM, the revised plan should include a standard that provides certainty that management actions will prevent livestock grazing in critical, other suitable, and potential recovery habitat.

Todd: Lumping with last issue. Nothing more to add.

Michiko: Can you give a summary of abundance and trends?

Debbie Cress: We are working with partners on habitat enhancement. I don't have numbers.

Erin Barton: The Biological Assessment (BA) cites Fray and Chambers 1997. There have been ongoing mark recapture studies, but no results yet.

Michiko: Are there specific areas of concern or is it a general concern?

Todd: Not specifically. We do know that the mouse needs grass two-feet tall with seed heads and we are not able to maintain that with grazing.

Todd requested BA, Erin said that it is available on website. Todd will look.

Debbie Cress: There are opportunities. We are learning what we can do to adapt with regard to monitoring. Appreciate that we can take it a step further to consider opportunities for other remedies. We need flexibility, but also need clear direction to hold ourselves accountable.

Cindy Tuell: FWS relies on the Forest Service and the Biological Assessment. There are misplaced assumptions that other agencies are protecting habitat for the mouse, pointing to each other for responsibility. We need to ensure protections are happening. Forest Plan can provide a stronger tie to impacts on the ground. Something that can be relied upon instead of false assumptions. I understand about traditional communities as way of life, but mouse and other species being wiped off the planet.

Michiko: We need to better understand the perceptions about how agencies work together.

Debbie Cress: We have a need for flexibility, but also need clear direction hold ourselves accountable.

GIVE INTERESTED PERSONS THE OPPORTUNITY TO PROVIDE INPUT

Chris Bugbee: Jumping mouse in trouble in a lot of places in the region. Let's rally now to have strong plan components to keep that population from tanking. Need to really recognize the role of grazing in the demise of the mouse. The primary driver is grazing. Grazing and mouse are incompatible. We can't keep cows out of those places. The whole section needs to be beefed up. There are several guidelines that we think should be standards and well as others. We need to protect where these species are. They are not able to disperse well. Only way is to remove from grazing. Also in peril are the water shrew and masked shrew. CBD in Tucson. Species in riparian areas.

Susan Ostie: On a recent CLFRP field trip, I learned about the huge number of species the Forest Service is responsible for monitoring. I support prescribed burning and thinning, which is why I am part of the collaborative. It is very expensive to do all the required monitoring at the project level.

Lucia Sanchez: Protocols implemented at the local level can support habitat. Rio Arriba has mitigated to protect riparian zoning and buffers in those areas, 300-foot buffer. We have a

floodplain development ordinance on the books. There is a lack of water and sewer infrastructure and understand about how they interact. We want to ensure species thrive on the landscape so they do not compete. Mitigations help to achieve multiple uses on the landscape.

Ralph Vigil: We don't have the mouse over on the Pecos, but acequias are wildlife habitat corridors. We can't invite development. There are greenbelts around acequias that have many beneficial uses, recharge, habitat. They contribute a lot. Not just for agricultural use.

HOLY GHOST IPOMOPSIS AND JEMEZ MOUNTAIN SALAMANDER – SANTA FE NATIONAL FOREST – 18 MINUTES

Holy Ghost Ipomopsis:

Objector alleges the Revised Plan fails to comply with the Endangered Species Act with regard to the Holy Ghost Ipomopsis; and that the Revised Plan, FEIS, and associated consultation documents, the Biological Assessment developed by the Forest Service and Biological Opinion written by the FWS, violate Section 7(a)(1) and 7(a)(2) of the ESA regarding the HGI. The Revised Plan does not provide a program for conserving the species as required by Section 7(a)(1), and the FWS's determination that the Santa Fe's Revised Plan is not likely to jeopardize the continued existence of HGI is unsupported, arbitrary, and capricious.

Jemez Mountain Salamander:

Objector alleges the Final Environmental Impact Statement for the Revised Plan does not comply with the National Environmental Policy Act (42 U.S.C. § 4321 et seq.) regarding the Jemez Mountains Salamander, because it does meet a significant purpose and need for the Revised Plan, does not provide a range of reasonable alternatives, and fails to take a 'hard look' at the environmental consequences of the Revised Plan to the species. Further, the objector alleges the revised plan and the draft record of decision fail to achieve the purpose and need to provide the necessary ecological conditions to contribute to the recovery of the Jemez Mountains Salamander, in violation of 40 C.F.R. 1502.13.

OBJECTOR:

Center for Biological Diversity – Todd Schulke

REMEDY(S) PROPOSED BY OBJECTOR

The EIS must be supplemented or revised to overcome the issues we described in our analysis above. Section 7 consultation requires a do-over. And the Revised Plan requires improvement to existing plan components and the addition of others to comply with NFMA and ESA.

Todd: These species (Ipomopsis and Jemez Mountain salamander) have very specific needs. The general thought is that if we do these things in the plan, that they will be okay, but the plan is a blunt instrument. These species need more specific standards and guides. The theme is common with all of these species. Objection process is predecisional. I didn't like it at first, but now I appreciate the ability to talk these things through.

GIVE INTERESTED PERSONS THE OPPORTUNITY TO PROVIDE INPUT

Don Norton: Plant (Holy Ghost Ipomopsis) was only scientifically identified 1980's and listed in 1994. The matriarchs of the canyon recognized uniqueness. We do not want to call too much attention to it. State Park and day use of canyon have increased the public use. The plant only occurs on a narrow one lane road. Less is more in terms of protection. I hope the Santa Fe pays attention. With the State Park, enforcement is very limited. People may be going to where they are not observed as much. Our group reminds visitors not to pick any flowers in canyon. We help with stewardship and outreach.

Chris Bugbee: I helped draft the grazing and riparian sections of CBD's comments. I was told things were not in the scope of the Forest plan. I also wrote an objection for the NNM Riparian project, but it wasn't dealing with the root cause. When is the right time to have the discussion? Do we have to wait 10 years for the AMP to have a meaningful conversation? It is a formal process with very structural requirements for what is in and what is out. Some of those formal processes are the most restrictive. When do we invite these conversations?

Jody Sutton: When you see that a response is outside the scope and want to know when we would deal with it, it depends on the decision and on the activity. We are going to need to have those conversations. I know with restoration projects, we are often looking at cumulative effects.

Additional Comments

Valerie Gremillion: Working on PhD in Ecological theory/complex systems science. NNM Forests are attractors for climate change. Need to use a systems approach.

Michiko: reflecting back to Valerie, you are suggesting that Forest Plans consider climate impacts as a system and how Forest Plans incorporate systems thinking.

Valerie: Glad that we can say and write the words "climate Change" again. Our last recommendation was for strategic placement of treatments. Large and old tree protections optimization on 4FRI. There is a tool developed by Matt Hurteau to identify the most critical acres to treat for addressing large scale fire. It identifies the most critical acres in critical way that is different than firescape approach. We should be using this tool. It should be included in plan, especially with the flood of money and work being proposed to address large critical landscapes and reduce wildfire risk.

I would appreciate clarification about process and the avenues to address my issues. One thing I hear is that we should be interjecting science at all levels. At what level is climate change addressed? How do we address system-wide effects? Where and when do we address these large-scale questions like response to drought and more positive treatments that ameliorate effects. None of these larger issues seem to have a place to be addressed. There are cascading effects that are not addressed using an individual species approach.

Michiko: My team and I had specific issues that we wanted to address at this meeting. They were selected because they are issues we felt we needed to gain further explanation. My final instructions will address all issues raised. Climate change is addressed at all levels of agency. Not only by national policy. Climate change is one issue where we are constantly looking at the emerging science.

Jacobo: Regarding communal grazing, from individual perspective, we need to invest in infrastructure. We need more people for communal function, to help with monitoring. We historically worked that way. The Red Scare in 50's got rid of communal use of Forest Service lands.

Arturo Archuleta: Appreciate the comments, relationships, and hierarchical nature of decisions. I have a general comment about lack of surveys... in order to address the remedy and what can be addressed in that area, we need some sort of language that prior to management decision, monitoring should be addressed at the site-specific level. Plan can take on a piece, but it may not address the specific actions. Jumping mouse is affected by grazing, so we need to look at elk as well. What is the balance? What treatment buffers are needed? What are the impacts we need to address before deciding what should and should not be allowed?

Susan Ostlie: I want to add to discussion about MSO habitat. When we evaluated a Protected Activity Center (PAC), we looked at the leaf litter and there were hundreds of bees, and horned toad jumping across road. When you have a PAC for MSO, it's not just for the owl, it protects hundreds of species.

Lucia: We appreciate ability to speak and help to create plans and policies to protect citizens. We are able to be that voice. USDA is organization that feeds America. Living in changing world and protecting natural resources here at home. Need to protect waters and headwaters. Thanks to James Duran and his staff, and also over on Santa Fe want to continue to be involved at this level. We can achieve balance with multiple use, follow NEPA and other federal laws, and protect grazing and economies of NNM. Today, only one county at table. We need to make sure we are engaged. We appreciate the process and all the people that participated today.

Close Out

Michiko: Please accept our gratitude for your time and participation today. We have a commitment to listening with a goal of being collaborative and sincerely address the concerns that partners and stakeholders have. It is our intent to truly listen and incorporate the things we have heard into our final plans.

MARCH 16, 2022

**RECREATION, TRAILS, AND RECREATION OPPORTUNITY SPECTRUM
9:00-10:00**

**CONTINENTAL DIVIDE NATIONAL SCENIC TRAIL MANAGEMENT AREA
– ALL FORESTS – 15 MINUTES**

Objectors asserts that for the revised Forest Plan to be consistent with the comprehensive management plan for the CDSNT the trail route must be located off roads and as close to the geographic continental divide as possible. To accomplish this the objector states that a CDNST Management Area with standards and guidelines should be created.

OBJECTORS:

Greg Warren

Continental Divide Trail Coalition – Luke Fisher

REMEDY(S) PROPOSED BY OBJECTORS

Develop an alternative that establishes a CDNST MA with plan components that protect the nature and purpose of the CDNST.

**CREATE ALTERNATIVE FOR HIGH POTENTIAL CDNST ROUTES – ALL
FORESTS – 15 MINUTES**

Objector asks that an additional EIS be produced to include an alternative that identifies and/or expands corridors along high-potential route segments of the CDNST; the additional EIS and alternative should protect high-potential route segments with components of the Comprehensive Plan.

OBJECTORS:

Greg Warren

Continental Divide Trail Coalition – Luke Fisher

REMEDY(S) PROPOSED BY OBJECTORS

Conduct an additional Environmental Impact Statement with at least one alternative that identifies CDSNT high potential route segment corridors, guided by the Comprehensive Plan and the NTSA. The routes identified in the alternative should be protected with plan components that align with the nature and purposes of the CDNST. Additionally, these routes, taking into consideration the 0.5-mile-wide corridor on either side, should be at least 1-mile wide, if not more, in order to give flexibility for future route layout considerations.

Greg Warren unable to attend.

Luke Fisher: When setting Desired Conditions, and Standards & Guidelines across three forest plans, all released at same time, there should have been a prioritizing for consistency across forests. Desired Conditions were different and they should be relatively same, but they were different. For example, motorized use on trails and continued allowable use. "Substantial interference" and scenery were also inconsistent. Need a strategy for a more consistent approach, especially for priority areas. Whether or not it is a Management Area was more Greg Warren's issue.

Suggest creating an alternative to identify and protect areas with high with potential. We really want to protect high potential areas into the future to avoid to potential conflicts. I like the idea of establishing study areas that would not have timber activity or temporary roads.

Michiko: Did the letters specifically mention concern areas?

Luke: There are optimal location reviews, but they have not been updated.

Steve H.: I reviewed the Standards and Guidelines and believe they meet most of the concerns. Drawing boundaries can be a double edge sword. We would not want to confine it either. We want to have a more adaptive approach.

Beth: I appreciate that the comments are solutions oriented. There are reasons why these are the last sections of the trail, there are conflicts, and we are likely to need some reroutes. Currently in the plan they are Designated Areas. What would be benefit of Management Area?

Luke: The Management Area issue was not an issue for use, a Designated Area works for us. The original trail was based on what was in place. We will need to work together in future. The plan should be proactive, looking forward. As there are changes, we don't want to close off options. Our group will continue to be engaged.

EFFECTS ON SCENIC INTEGRITY AND ROS – ALL FORESTS – 15 MINUTES

Objectors contend the EIS must disclose effects of the proposed action and alternatives on scenic integrity and ROS class conditions and that analysis should be based on allowable uses. An objector makes clear “Viewsheds from the Continental Divide National Scenic Trail have high scenic values. The foreground of the trail (up to 0.5 mile on either side) is natural-appearing and generally looks unaltered by human activities. This desired condition does not clearly state the Scenic Integrity Objective.”

OBJECTORS:

Greg Warren

Continental Divide Trail Coalition – Luke Fisher

REMEDY(S) PROPOSED BY OBJECTORS

Effects on scenic integrity and ROS class conditions should be based on analysis of the effects of the allowable uses. Utilizing ROS and Scenery Management systems will help ensure that NEPA assessments are systematic and accurately describe the affected environment and expected outcomes from each alternative.

Luke: Same with Scenic Integrity and ROS. For consistency, we would like clearly stated desired conditions and consistency across all 3 plans. One our main concerns is with timber management, geothermal, and other extractive activities. We want the desired conditions stated clearly so that future uses maintain the scenic integrity.

Beth I.: Don't we have desired conditions for ROS and SMS?

Erin B.: We do, but they are not in the CDT section.

Steve H.: Where we have done restoration activities, we address scenery objectives at the project level, where we put landing, screening, etc. Sometimes it is not possible to meet all objectives due to physical constraints, but there is the desire to protect scenic integrity.

Luke: ROS is compliant with the CDT. We know what it is but want to make sure it is clear and allows for public oversight. It helps if it is as specific as possible. ROS S&Gs allows for supportive monitoring to determine carrying capacity. We don't want to see substantial interference and the only way to know that is through monitoring.

STANDARDS AND GUIDELINES BASED ON ROS – ALL FORESTS – 15 MINUTES

Objector asserts the responsible official has failed to establish ROS desired conditions, standards, and guidelines to protect the nature and purposes of the CDNST in any of the alternatives. The objector specifically states the following regarding plan components: “The revised plan must include plan components to provide for sustainable recreation; including recreation settings, opportunities, and access; and scenic character. The revised plan must include desired conditions for sustainable recreation using mapped desired recreation opportunity spectrum classes. The plan should include specific standards or guidelines where restrictions are needed to ensure the achievement or movement toward the desired recreation opportunity spectrum classes. The 1986 ROS Book describes desired conditions for each ROS setting or class.”

OBJECTORS:

Greg Warren

REMEDY(S) PROPOSED BY OBJECTORS

The plan should include specific standards or guidelines where restrictions are needed to ensure the achievement or movement toward the desired recreation opportunity spectrum classes. Restrictions are needed in Primitive and Semi- Primitive ROS settings to ensure that desired conditions are realized. The 1986 ROS Book describes desired conditions for each ROS setting or class.

Greg Warren unable to attend.

Steve H.: We did try to address it through mapping rather than narrative. ROS is applicable to broader area. ROS in its own sense is a desired condition, which I think is what being asked for.

James D.: CDT comprehensive plan will carry it into the future. The Forest Plans set that up.

Michiko: Is there something that we are missing that anyone can help us understand?

Steve H.: A fundamental part of NFMA is that projects must be consistent with the plan. There may be multiple ways to get at what is desired. Plan consistency check with all parts of the plan however that is laid out, whether maps, narrative, DCs, S&G.

GIVE INTERESTED PERSONS THE OPPORTUNITY TO PROVIDE INPUT

Don: Recognizing recreation residences in terms of ROS is important to us. Rec residents are important use on National Forests.

Brent Bonwell: If ROS is the defining principle, we need to recognize that the recreation world has changed. Specifically in reference to current ROS. Currently includes non-motorized and mechanized, but eBikes are a whole different issue, as well as people with disabilities.

Arturo Archuleta: In terms of remedies proposed, keep in consideration that Carson and Santa Fe are traditionally land grant areas. Historical use, wood collection. Remedies could affect the ability of those folks to engage in that traditional use.

Vidal Gonzales: Traditional and cultural use areas for tribes and traditional communities, no use area is too big.

Lucia Sanchez: Viewscape is likely to encompass multiple use. There is no way to completely avoid it. The trail runs along developed areas; there are historical carvings on aspen that are part of the multiple-use viewshed. Many of these uses have occurred for a long time.

Dylan Rose-Coss: Reiterate Brents point to consider modern, not so traditional uses, mountain biking as well as other recreation opportunities.

Michiko: Help us understand how we fully appreciate all of the uses. Modern uses, traditional uses, multiple uses?

Susan: Where is motorized use not allowed? I know wilderness, but what about wilderness study, roadless, eligible even if not recommended? Mentioned Mt. Taylor.

Beth- You can refer to the TMR MVUM designated motorized routes.

Steve H.: Each plan has direction for roadless areas. There are differences between Wilderness, Recommended Wilderness, Roadless, and also MVUM. There was some road building in a roadless area because of grandfathered uses. Desire is for a non-motorized setting. Areas prioritized for decommissioning, but there were decades of road building, so we are not adding anything new, but not prohibiting in some of those areas.

Michiko: With the different layers and systems that address and control our actions and behaviors. Asked participant if there is a gap where there is a perceived weakness in how they interact.

RECOMMENDED WILDERNESS AREAS

RECOMMENDED WILDERNESS AREA PROCESS – ALL FORESTS

Objectors state that the recommended wilderness process was arbitrary, flawed, and in violation of FS regulations including the 2012 Planning Rule (36 C.F.R. 219.1(g)) because of the analysis criteria that Recommended Wilderness Areas (RWAs) be adjacent to or contiguous to designated Wilderness without proposed restoration.

OBJECTORS:

Joanie Berde – Carson Forest Watch

Logan Glasenapp – New Mexico Wild

REMEDIES PROPOSED BY OBJECTORS

CARSON – 20 MINUTES

JOANIE BERDE - CARSON FOREST WATCH

- We recommend the Carson take another look at the areas that were not included as wilderness appreciate and recognize the importance of intact forest for watershed protection wildlife habitat and biodiversity and add those areas that were deleted.
- The Carson National Forest restart its Chapter 70 wilderness recommendation process in accordance with the guidelines and NEPA by employing a more transparent evaluation process and considering a wider, more reasonable range of alternatives.

Joanie Berde not able to attend.

LOGAN GLASENAPP - NEW MEXICO WILD

To address this abuse of discretion and violation of Forest Service regulations, the following recommended wilderness areas should be included in the final forest plan: All 9,361 acres of the Valle Vidal Recommended Wilderness Area Camino Real South Recommended Wilderness Areas, both C14v and C14x Tres Piedras North Recommended Wilderness Areas, W27a, W29c, and W29e Ghost Ranch Recommended Wilderness Area, and Sierrita de Cantillon Recommended Wilderness Area.

Logan Glasenapp: There are two primary issues: 1) the selection requirement that Recommended Wilderness be contiguous, and 2) preference for restoration work in the future. If they meet the criteria now as high or very high, they can still have provisions for restoration. The Forest Supervisors have that discretion. By not recommending them, it leaves them open to industrial scale mining and other industrial extractive uses in the future.

The regulations say that there is a responsibility that the Plan content is within the fiscal capacity for the unit, but the restoration proposed is beyond the fiscal capacity.

The final Wilderness preferred alternatives have what was considered an untenable tradeoff that resulted in dropping areas because of restoration needs even though rated as high or very high. They were dropped from consideration because of one of two hang-ups.

James D.: Is your preference the maximum wilderness alternative for all three forests? What is your preferred end state?

Logan: The massive inventory does not match what we found, especially for the Cibola. We will continue inventories for future consideration, none of us want to restart. We are also eager to get to finish line, implemented and managed. Yes, adopting the max wilderness alternative would be a desirable outcome for us.

Logan: There probably are areas that we agree that if restoration is needed, it could occur, but there would be a conversation of a more holistic desired condition. We want to prevent immediate and long-term degradation. Having them recommended now better preserves the status quo.

Beth I.: Does NM Wild see a hierarchy? How did you approach that?

Logan: We don't have questions about the inventory, but about the contiguous and restoration needs criteria. There are probably some specific areas that we would disagree on the ground, but it is really about the addition of these two concepts.

Steve H.: One area that we have been getting money is restoration. Once an area is Recommended Wilderness, there is an obligation to maintain its wilderness character. Also, there are management concerns about the feasibility of managing ATV intrusion. We have an obligation to preserve, so we did some line drawing where there were topographic features that help provide that protection.

Logan: One of our concerns is the presence of illegal/unapproved activities that led to areas not recommended and not protected that are open to continues abuse. Whereas a recommended area opens doors for groups to lobby Congress, like Wilderness defenders. There are some collaborative opportunities for providing protections.

Steve H.: The process first looks at eligibility, then the management implications. We did not exclude eligibility, but we did make management boundary decisions.

Michiko: We have an obligation that the plans are fiscally achievable, It's an intersection between the Planning Rule and appropriations.

Logan: There are places that are overgrown. Our concern is that the tradeoffs are outside the fiscal capability of the unit.

Michiko: Help me to understand what you are using to determine our fiscal capability.

Logan: I am not an accountant. I am just looking at the past 5-10 years of what was accomplished and fiscally reasonable. I did not do number analysis.

CIBOLA: 20 MINUTES

LOGAN GLASENAPP - NEW MEXICO WILD

Preferred Remedy: Incorporate the wilderness recommendations of Alternative D into the final forest plan:

- Manzano Mountain Wilderness Area Expansion 1 totaling 5,734 acres
- All Apache Kid Wilderness Area Expansions totaling 75,990 acres
- All Withington Wilderness Area Expansions totaling 10,267 acres
- Datil Mountains Recommended Wilderness Area totaling 18,349 acres
- Bear Mountains Recommended Wilderness Area totaling 7,174 acres
- Magdalena Mountains Recommended Wilderness Area totaling 6,394 acres
- Guadalupe Recommended Wilderness Area totaling 14,988 acres
- Hogback Recommended Wilderness Area totaling 5,564 acres
- Little Water Canyon Recommended Wilderness Area totaling 27,348 acres
- Spruce Park Recommended Wilderness Area totaling 6,198 acres
- Panther Canyon Recommended Wilderness Area totaling 27,598 acres

Alternative Remedy: If the Cibola decides to adhere the adjacency or contiguous requirement into its final plan and ROD, it should at least include areas where the only barrier to direct adjacency or contiguousness is one road, following the approach of the Gila National Forest.

Michiko: I am not trying to speed through, but these issues are very similar. and I think I understand your logic.

Logan: That's why it's important to get it right. The Gila and Lincoln used similar rational. Restoration is a top priority and it's arbitrarily leading to areas not being protected, recommended. The five NM forests were laboratories/early adopters. I am thinking about precedent across the country.

Michiko: That helps us understand the why here, why now.

Michiko: We welcome you to provide any additional citations, criteria, checklists, or evaluation frameworks. Please submit to Cody Hutchinson.

GIVE INTERESTED PERSONS THE OPPORTUNITY TO PROVIDE INPUT

Lucia: We took it upon ourselves to look at areas being proposed on Carson. We went to five locations and did our own evaluation. We determined they do not meet the criteria, many campsites, Cantillon has domestic waters, snowmobiles, hikers and mountain bikers. It is very difficult to see areas where trails and other signs of man can't be seen. Many cars every month, when you talk about viewscape, these don't make the criteria, difficult see them meeting the definition of wilderness. We look at PLOT (payment in lieu of taxes) dollars, and put to use to help complete the work collaboratively, government-to-government. It is important there is recognition that there are generations of historical use. We helped with meetings and submitted

comments. We opposed any new area, specifically Cantillon, Ghost Ranch, and others. We will forward materials.

Jacobo Baca: NM land grant submitted extensive comments. Council is consistent in advocating for traditional use and is consistent with the MUSY Act. On the Carson, C14 V and X, Land Grants unable to attend maintain interests and claim to lands and wood. These watersheds feed the Acequias. On Cibola, Manzano Land Grants and others in the area. Wilderness would encroach. Our main interest on the Council is maintaining traditional uses, implicitly and explicitly protected rights. Even without full Congressional designation Recommended Wilderness is de facto wilderness. That could interfere with traditional uses important to communities.

Vidal Gonzales: The whole landscape was managed by pueblos. Santa Clara is specifically against Palo Verde and ?? designated wilderness because they would adversely affect ceremonial uses. Bearhead Peak, Conones Creek, (many) are within the Tewa basin and four sacred mountains. Designation would inhibit transporting elders to areas and the passing on of traditional knowledge and traditional uses.

Susan O.: San Mateo Mountains areas were not considered for preferred alternative. Roadless inventories of the area showed not only have no roads, but very few trails. I did submit it in my comments. Would like to see Little Water Canyon protected. It is a unique biozone in one little canyon. There are studies for birds and plants by the Friends of Little Water Canyon. They have worked with Land Grants in this area, their harvesting of traditional plants is not impeded. Access not impeded. Appreciate providing input. I have GPS and photographs of unique areas that deserve protection.

Brent Bowell: Mountain bike club. Concern that recommended wilderness means no mechanical, no bikes. Right now, the bicycle groups do a lot of trail work on a volunteer base. Recommended Wilderness limits recreational opportunities. We clear downed trees with chainsaws, biking is an economic driver, should recognize what recreation brings. If recommended, it would be a dire impact to recreation and the ability of forest to maintain recreation to those areas.

Michiko question for Lucia Sanchez or Vidal Gonzales: Are you aware of existing management that balances traditional use and management? Can you point to areas where it's problematic? Do you have any examples of good or problematic language? Are there any case studies?

Jacobo Baca: There are areas where there has been greater balance. Stewardship block, fuelwood within recommended. Forest mayordomo? Carson feeds community, engages youth, balance of protecting wilderness and needs of communities are good, but further expansion of wilderness would blow it out the water.

Vidal Gonzales: There has been a gentrification of our shines, degradation. We can't do a lot of things, like bring elderly into areas. The duality of culture and wilderness is not present indigenous cultures.

Lucia: I cannot think of where existing use has been a problem. Communities have worked collaboratively to keep areas usable and safe. Wilderness Study Area, where access to a campground with dead and diseased aspen. Climate change, insect and disease hit and trees died, so they closed the campground. We understand that. One gateway to mountain and upper meadows was used summer months for sheep. We used ATVs and trucks for fixing fences. Need ATVs so they can help keep roads open and safe. Motorized access is necessary for big game retrieval. NM communities are food deserts. Firewood is important. For many, wood is the sole way to heat homes. Even though there is natural gas, not all community have access. Restricting access to the summit limits access to summit views. Snow mobiles, camping and fishing bring people to the area. Neighbors take care and watch out for people leaving trash and damaging paint. Multiple use is achieved in spite of funding not being available. Doesn't make for a round peg in square hole.

Michiko: I will think about it over lunch. Thinking over remedies, let us know if there are places where we have gotten it right, or even other land managers that have done a good job balancing cultural use and wilderness designation.

SANTA FE: 20 MINUTES

LOGAN GLASENAPP - NEW MEXICO WILD

To address the abuse of discretion and arbitrary decision-making, the following recommended wilderness areas should be included in the final forest plan:

- Enchanted Lakes Recommended Wilderness Areas P88A and P88B
- Cañone's Creek Recommended Wilderness Area
- Wolf Draw Recommended Wilderness Area
- Pollywog Recommended Wilderness Area
- Black Canyon Recommended Wilderness Area
- Tesuque Creek Recommended Wilderness Area
- Guaje Canyon Recommended Wilderness Area
- Arroyo de la Presa Recommended Wilderness Area
- Polvadera Recommended Wilderness Areas E53A and E53B
- El Invierno Recommended Wilderness Area
- Bearhead Peak Recommended Wilderness Area
- Cochiti Canyon Recommended Wilderness Area
- Virgin Mesa Recommended Wilderness Area
- Burro Basin Recommended Wilderness Area
- Cañada Corral Recommended Wilderness Area

Logan: There is language in the Wilderness Act for provisions for trees and solitude, but also those cultural sites because it prohibits industrial use. More protection than if not. Hunting, fishing, hiking, and plant collection are allowed. Regarding "30x30", we don't know what "conserve" will mean, but recommended wilderness better preserves status quo.

GIVE INTERESTED PERSONS THE OPPORTUNITY TO PROVIDE INPUT

Vidal: Ecotourism does the opposite of protection, it brings people to significant spiritual sites and causes degradation. Produces gentrification of areas and degrades cultural areas with the influx of outsiders. Don't see compatibility.

Jabobo Baca: Regarding Lands Grants and Wilderness, Wilderness is supposed to provide for continued use, but it changed the way we have grazed. Our interpretation of 30 x 30 is that traditional uses are conservation minded. We have been living within the area for centuries. We do not endorse wilderness expansion.

Michiko: Thanks to everyone for robust conversation. After lunch we will have more on Wilderness.

THOMPSON PEAK RECOMMENDED WILDERNESS AREA – SANTA FE – 30 MINUTES

Comexico objects to the proposed designation of the Thompson Peak area in the Santa Fe Forest Plan because the company believes the responsible official did not factually provide evidence provided during the comment period and takes exception to a claim that no commercial production is reasonably foreseeable.

OBJECTOR:

Comexico LLC, Pat Siglin

REMEDY(S) PROPOSED BY OBJECTOR

USFS should withdraw its endorsement of Alternative 2 to the extent that it proposes wilderness designation of areas of the Thompson Peak addition which conflict with Comexico's unpatented lode mining claims and a buffer of 1000 ft.

Pat S.: Our objection is three-fold. First, locatable minerals were not properly analyzed. When drawing boundary, it encroached our unpatented mining claims. Documents in 1987 indicated a high potential for mining. Recommendation is not based on what is foreseeable. It ignores prior forest plan and documents. What we are proposing is not new.

2nd, A large part of area does not have Wilderness character, there are roads, disturbance, etc.

3rd, Wilderness and locatable minerals are not compatible. It adds layers of restrictions that become unresolvable. This Wilderness recommendation can be viewed as a taking.

Stephen Lauer, Attorney representing mining company: Taking is important. This raises the issue that there is a need to evaluate potential costs that could result from plan actions. It may have a laudable purpose, but there is a cost to a particular property owner. There is no “taking” without compensation. Proposed Recommended Wilderness would cut the claims in half. Also, it could affect claims adjacent, equipment noise, etc. There have been investments in mining properties, investment in materials, expectations, values of Comexico’s reserves, before making a decision, you need to be aware of the potential significant costs.

Michiko: Recommended Wilderness area is not a Wilderness designation. I want to better understand how Recommended Wilderness would impede efforts.

James: Areas were identified because they have wilderness character. They do not fall under protection of the Wilderness act.

Stephen Lauer: Recommendation and designation is one in the same from our standpoint. Courts look at whether it interferes with investment backed expectations. Designation could have an effect on investment dollars.

Pat S.: There were ten unpatented claims in 1980, 200 in 2019. We culled some back, now there are about 150, plus 10 with lease that existed prior. We have not proposed a mine, just proposed exploration, and we are concerned with how that might be affected by Recommended Wilderness.

GIVE INTERESTED PERSONS THE OPPORTUNITY TO PROVIDE INPUT

Logan Glasenap: We support keeping Thompson Peak as drawn. It was already been redrawn to exclude Jones Hill area old mining pads and also because it’s the only area that has had a proposal for about 100 years. Whether designated or recommended, it is subject to valid existing rights, so it’s not a taking. Work to recommend Thompson Peak had been going on for a decade, it is not response to 2019 claims.

Jerry O shea: I have lived here for 45 years. We have been working to get Thompson Peak most of that time, proposed RARE 1, RARE 2, lots of documentation about that. Pursued by the people of Pecos. I do not know of any community that objects. Recommendation has widespread support from the Pueblos and federal representatives. There has been excellent work to show that it is an area with beauty, roadless, wildlife, caves, box canyons, and bear dens.

Dan Roper, Trout unlimited: I want to go on record for supporting Thompson Peak. Comexico contends that this encroached 2019 claims, but we began the wilderness evaluation years ago. It was well underway, showed Thompson Peak SP-185B. Because, they are primarily making a

takings claim. We should trust in process to administrative. There have been claims in most Recommended Wilderness areas.

Pat S.: We did not locate claims as land grab. Claims were based on access and exploration in the area. Boundary does come 50 feet from the Jones hill adage. If activity, would likely result in disturbance. I agree that parts of Thompson Peak have wilderness characteristics.

Bill Gooch: I want to chime in to support Thompson Peak. I own property just to the south. I've hiked the area from the south and in from several canyons. It is difficult to get access, but incredibly scenic. Amazing and unique area. Wilderness designation would help to protect a series of headwaters for Pecos River.

Don Norton: We are very much in favor of Thompson Peak, but it will be difficult access. We are concerned about public access. Our road is a single-track road. All known plants (Ipomopsis) grow within feet of FS Rd. We are there 24/7 during the summer. Holy ghost is on access road to Pecos Wilderness to North. We would like to be involved in all and other aspects in that canyon.

CARSON NATIONAL FOREST WILD AND SCENIC RIVERS 1:30-2:30

CHANGED ELIGIBILITY ASSESSMENT – 30 MINUTES

Objectors assert the responsible official failed to document the physical changed circumstances that occurred for the 62 river segments or river corridors that were eligible in the 2002 WSR assessment but were found ineligible in the 2019 Wild and Scenic Rivers assessment.

OBJECTORS:

Rachel Conn - Amigo Bravos

Michael Fiebig – American Rivers

REMEDIES PROPOSED BY OBJECTORS

RACHEL CONN - AMIGO BRAVOS AND MICHAEL FIEBIG - AMERICAN RIVERS

Document the physical, on-the-ground changed circumstances that occurred to the river segments or river corridors previously found eligible in the 2002 WSR Evaluation justifying their ineligibility in accordance with the 2012 Planning Rule and Forest Service Handbook in the 2019 WSR evaluation and the revised final plan.

MICHAEL FIEBIG - AMERICAN RIVERS

The Carson National Forest retain eligibility for the 25 stream segments that were inappropriately re-evaluated and revert back to the 2002 WSR Evaluation, correspondingly adjust the Final Forest Plan and Final Environmental Impact Statement (FEIS) to reflect those eligibility findings, and appropriately manage those streams and their corridors in a manner that ensures the characteristics warranting their Wild and Scenic eligibility are protected.

Kelly Nokes: Only changed circumstances can change eligibility, but over 60 rivers previously determined eligible were not included. Changes were not on the ground, only changed policy.

When you say document, you want to look at what specific features are you asking. 60 segments were found to be no longer eligible. Needs to be linked to changes. No documentation for why reevaluation needed that supported the downgrading of those 60 river segments.

Michiko: You are saying the segments were pulled out of eligibility due to policy rather than changes on the ground? I would like clarification if there was a policy shift and what that is.

Michael Fieberg: I agree with Amigos Bravos. Characterized well, but want to clarify, once a segment is eligible, it stays eligible. Twenty-five segments should have been included. Downgrades are only due to changed circumstances.

FREE-FLOWING ASSESSMENT – 30 MINUTES

Objector asserts the proposed plan misinterprets the definition of "free-flowing," inappropriately denying wild and scenic river eligibility on streams with minor structures.

OBJECTOR:

Michael Fieberg – American Rivers

REMEDIES PROPOSED BY OBJECTORS

Stream segments found ineligible because of minimal effects on free-flowing condition from minor structures must be re-evaluated for Wild and Scenic River eligibility and, if otherwise qualified, found eligible. Stream segments found ineligible because they contain, or are downstream from, fish barriers installed to protect or enhance habitat for rare native fish must be re-evaluated for wild and scenic eligibility and, if otherwise qualified, found eligible.

Michael Fieberg: Fish barriers can be designed and installed in compliance that allows for it to be free flowing. We challenge the forest not to discount fish barriers for rendering a segment ineligible. There are structures that don't diminish ORVs and don't impede free flow. We have many structures in areas that are designed that don't diminish ORV or free-flowing character. Remedy is specific to structures that qualify as minor. Two categories of streams, those that do have structures and those that do not, assessed regardless of potential for fish barriers. Fish barriers are value enhancing for endangered fish values. There are examples...Fossil Creek.

GIVE INTERESTED PERSONS THE OPPORTUNITY TO PROVIDE INPUT

Jacobo Baca: As part of the government working group, we have participated in the WSR process. One of our concerns is that the 2002 eligibility did not bring in community interests. Many have Acequias that are affected. Acequias and Land Grant Communities rely on these watersheds. Evaluation in 2002 did not meet the requirement. Process on Carson has now done that. While we don't agree with it all, we do agree with the process.

Arturo Archuleta: Potential impact of buffers zones on water rights and downstream users. There are some limitations that would prohibit certain management activities. Wilderness Act, do not want to lead to cherry stems, and result in de facto extension of wilderness, which is not consistent with Wilderness act intent.

James Duran: We learned a lot about the infrastructure in the Acequias, It was information that we didn't have.

Bonifacio: Rio Las Rambas, Rio Santa Barbara, Rio Puro, did not meet WSR because of Acequia diversions. Concentrate on Santa Barbara campground to wilderness. Water rights on Santa Barbara. WSR recommendation affects many water rights. Could impact cutthroat trout. It is important that consideration be given to this.

Michiko: We need to ensure we are paying attention to previous infrastructure, particular Acequias impact on free-flowing character.

Peter Rich: Above the campground, there is no diversion, but there is a bridge to the Pecos Wilderness, a manmade structure. It goes into a deep canyon. There are no acequias in that section. Regarding conservation of cutthroat and non-natives, it would be appropriate for a fish barrier to protect cutthroat. Don't want to impede, ensure good quality water.

Lucia: There is WSR support from the Governor for designation.

Mike Feiberg: WSR Act, whether eligible or designated. Forest identified free flow and at least one ORV. WSR act has robust protections for water rights and private property. Extensive eligible and designated WSR with infrastructure. Wilderness is much more stringent, WSR

motorized and mechanized are allowed, access is not restricted, there are even designated WSR in urban areas.

Bonifacio: With my experience on the Carson, I am not comfortable with changes in how it could be interpreted.

Close Out

MARCH 17, 2022

LAND USE HISTORY AND ACCESS FOR TRADITIONAL COMMUNITIES AND LOCAL GOVERNMENTS 9:00-9:30, HALF HOUR BREAK, THEN RETURN 10-11:30

TRADITIONAL COMMUNITY AND LOCAL GOVERNMENT REPRESENTATION IN FOREST PLANS – ALL FORESTS – 15 MINUTES

The objectors contend that the lack of a separate sub-section for Land Grants-Mercedes under the Traditional Communities and Uses Section of the final plan denies historical accuracy and equity to these communities whose property rights are protected by the Treaty of Guadalupe Hidalgo: Land grants established prior to 1848 are protected by the Treaty of Guadalupe Hidalgo (see State of New Mexico Constitution §49-1-1 and §49-4-1 NMSA 1978) along with valid property rights claims for access to and use of community land grant common lands and established water rights and easements for acequia infrastructure. Lack of separate sub-section in the plan potentially infringes on the protected treaty rights of pre-1848 communities by empowering post 1848 communities with equal standing and status regarding access to and use of traditional resources. The objector states that there are no standards or objectives for the Rural Historic Communities (RHC) section in the final plan which are required by the 2012 Planning Rule.

OBJECTORS:

Leonard Martinez - San Joaquin Del Rio de Chama Land Grant – DID NOT PROVIDE A REMEDY

Juan Sanchez - New Mexico Land Grant Council

Lucia Sanchez - Rio Arriba Board of County Commissioners – DID NOT PROVIDE A REMEDY

Bonifacio Vazquez - Merced de Santa Barbara Land Grant – DID NOT PROVIDE A REMEDY

REMEDIES PROPOSED BY OBJECTORS

JUAN SANCHEZ - NEW MEXICO LAND GRANT COUNCIL:

- Create a separate sub-section for Land Grants-Mercedes within the Traditional Communities and Uses Section in the final plan.
- Recommend restructuring the Traditional Communities and Rural Historic Communities section so that Land Grants and Acequias are given their own section separate from Rural Historic Communities established after 1848 (ties to Hassell Report Recommendation 1; Hurst Policy Memo paragraph 17).

LEONARD MARTINEZ - SAN JOAQUIN DEL RIO DE CHAMA LAND GRANT –

LUCIA SANCHEZ – RIO ARRIBA BOARD OF COUNTY COMMISSIONERS –

BONIFACIO VASQUEZ – MERCED DE SANTA BARBARA LAND GRANT DID

NO REMEDIES PROVIDED

Leonard Martinez not available.

Arturo Archuleta: Land Grants predate US. They were former common lands. Adjudication process did not recognize all valid rights. There are long stranding use claims. The 1968 Hassel report had recommendations that recognized the uniqueness of both Native American tribes and Land Grant communities. The three forests are managed differently. In 1976, Hassel became Regional Forester. Hassel rescinded the memo because they would be better served by incorporating it into plans. But the plans did not mention it. We are not tribes. We have no tribal sovereignty; it is a different relationship. There are equity issues that have been ignored over a long history. For example, we just learned about Residential Cabin process. When private individuals have private cabins for 100 years. From our perspective, these are affluent summer homes owned by people from out of state. In 1765 community, there is a swath that is now part of the Sandia Wilderness. They had summer cabins, but inside wilderness, but now they are not able to enjoy them.

Our people had grazing rights strips, and also historic cabins that they had a deep connection with. San Joaquin de Chama, the land was stripped away and given to a cattle company. There is a cemetery on Forest Service land. Community told they couldn't clean the cemetery. Finally, got an easement and access to the cemetery. Must be revisited every 30 years. I look at these inequities. In order to get on course and build on relationships long term, we need recognition. We are seeking recognition via congress and to be recognized by Forest Service administratively. The Plan would help with stewardship and collaboration projects.

We need guidelines. We have been told the most important is the Desired Conditions, but the plans lack guidelines and standards that help to get you to those DCs. Most mentions are in Management Approaches, not plan components. They are in the Toolbox, but not required. Acequias need their own place in the planning process. They are recognized by the State.

Acequias need their own section in the plans. Stewardship on land that supports the NM Land Grants and Acequias, access to historical easements, and right of ways to do upkeep.

Preservation of language important. There are words in the Spanish language for cultivation and water that is a specific Spanish word, no good translation. We do not want degradation of that language. Roads, trails, and easements that existed prior. Our elders know where, not on modern maps. Oral tradition is passed down going there. Rio Arriba proposing remedies. Endorsed remedies proposed by NMLGC.

Michiko: I think I heard you say some words should not be translated to English?

Lucia: They can be translated, but they lose their meaning and context.

Michiko: Do we have a listing of words?

Lucia: We can provide a list of words and context.

Michiko: I also heard you say there was preexisting infrastructure with no written documentation, and it was passed down only through oral history?

Bonifacio: Santa Barbara contention, cannot find where the Forest Service got the title. Early 1900's when Forest Service created. Where is the title? Able to come across logging document for Santa Barbara Pole company. Whole grant land grab bought for one dollar. How do we see that it is legitimate? We want Make sure that plans have measurable outcomes. Land Grants are recognized as a political subdivision in the State. We have standards for governance, a Board, Organized and operated. Oversight was born out of a different system. Some has become defunct but could be reconstituted, such as the former commonlands. We still have a vested interest. The communities are still there. Policies change, but the communities are still there. We are not going anywhere. Being good neighbors is just good policy.

James: When you were talking about administrative language, Acequia guidance and terminology. If that language was in the plan, what would it be? Trying to get a sense of what else is needed.

Arturo: Forest Plan is an important document. Birth of plan has had such a long life. The original plan was put in place when I was nine. Individual guidance, that adopted agency policy. Hurst memo can go away with changes in policy and personnel. We are elected officials, but we are volunteers. Council now has paid staff. Without a professional staff, we never could have participated and provided input on the three plans, three EISs, each thousands of pages. Golder strategy to meet DCs. Achieving measurable outcomes is important to us. Peer reviewed best available science, New Mexico State University has done studies on range improvement that is peer reviewed science. We have a changing landscape, changing climate, water storage, disease, world-wide pandemic. Forest planning use of language is not that different. Monitor and cyclical.

Michiko: I am going to try to summarize simply to capture this complex topic. What I am hearing is there is a desire for stability and recognition of traditional values that is enduring and that the Forest Plans are one of the ways to provide that endurance for traditional and local Communities.

Leonard Sanchez: Our Land Grant would like to see its own section. It is unique, predates the Forest Service. We want access to training and education for the local work force to make county more competitive and encourage working with Cooperative extensive service. Preference to build capacity, training, local communities, help provide PPE, and jobs. Reiterate whatever we can do to provide opportunities and prevent exclusion. We use youth conservation corps, it's not just heavy lifting, eventually they become doctors and lawyers because we expose them to other opportunities. Helps to teach self-sufficiency and self-determination for underserved communities.

Michiko: What I am hearing is you are requesting opportunities. Look at plans and planning to address employment and labor and to keep forest products available for traditional communities to sustain the vitality of traditional communities, promote opportunities for training and employment for youth.

James Duran: Are there any other examples of language other agencies or programs would be beneficial?

Lucia: State of NM Economic JTIP (Job training Incentive Program). Jobs and wages. Help while training employer and employee. Hope for parity for how we allocate resources.

Arturo: I'd like to speak to James' question. Thinking about how it relates to plan language. Projects on State lands, partner with land grants. Joint efforts. Land Grants looking at revenue stream and opportunities to engage youth. Developing projects, Ancestral lands crews, extend time for them to do work on trails etc. Add to them getting opportunities, possible career paths. Michiko: Sometimes when a remedy proposed, we may not be able to address it as written, but there may be way to address where we do have that authority. It helps when we see examples. We don't have answers at this time, but it points to possible solutions.

TRADITIONAL COMMUNITY AND LOCAL GOVERNMENT INVOLVEMENT IN FOREST SERVICE PROJECTS – 15 MINUTES

Objectors requests project planning will protect management uses and forest resources, including aquatic species, their habitats, and water quality, while not impacting the uses by traditional users.

OBJECTORS:

Juan Sanchez - New Mexico Land Grant Council
Bonifacio Vasquez – Merced de Santa Barbara Land Grant

Leonard Martinez - San Joaquin Del Rio de Chama Land Grant – DID NOT PROVIDE A REMEDY

REMEDIES PROPOSED BY OBJECTORS

JUAN SANCHEZ - NEW MEXICO LAND GRANT COUNCIL

Request for collaboration on project planning, implementation, access, resource protection, and infrastructure with land grant communities and local ranger districts.

BONIFACIO VASQUEZ - MERCED DE SANTA BARBARA LAND GRANT

The time for collaboration and implementation is now. The Santa Bárbara Land Grant has worked to build relationships with the RD and the NF inside and outside of this planning process and it's time to move forward with these relationships and provide for the community.

LEONARD MARTINEZ - SAN JOAQUIN DEL RIO DE CHAMA LAND GRANT – DID NOT PROVIDE A REMEDY

BREAK 10:00-10:30PM

USE OF LOCAL LABORERS FOR FOREST RESTORATION – 20 MINUTES

Large companies are awarded contracts rather than local laborers, including land grant communities. The objector emphasize this importance by stating “Local contractors that are likely to hire local laborers often cannot compete with larger companies that win these federal bids and local laborers that are more often than not land grant heirs are excluded from workforces that are restoring their community land grants former land grant common land. This objective would work to ensure that whether a contractor is local, regional, or national, local laborers have the opportunity to work on these projects, bringing their local knowledge of the landscape into restoration projects, thus benefiting the local economy and the restoration project itself.”

OBJECTORS:

Leonard Martinez – San Joaquin Del Rio Chama Land Grant

Juan Sanchez – New Mexico Land Ground Council

Lucia Sanchez – Rio Arriba Board of County Commissioners

REMEDIES PROPOSED BY OBJECTORS

Provide a forest plan standard that ensures local contractors are awarded restoration projects. “At least 70% of the workforce for forest and watershed restoration projects come from adjacent local forest dependent communities”

TRADITIONAL COMMUNITY GRAZING RIGHTS – 20 MINUTES

Objectors assert Land Grant Communities are not provided opportunities for communal grazing allotments nor provide for traditional and cultural uses needed for the land grant communities.

OBJECTORS:

Leonard Martinez - San Joaquin Del Rio de Chama Land Grant – DID NOT PROVIDE A REMEDY

Juan Sanchez - New Mexico Land Grant Council

Lucia Sanchez - Rio Arriba Board of County Commissioners

Bonifacio Vasquez - Merced de Santa Barbara Land Grant

REMEDIES PROPOSED BY OBJECTORS

JUAN SANCHEZ - NEW MEXICO LAND GRANT COUNCIL

Suggests as a remedy that the Forest Service consider and analyze an alternative in which opportunities for communal livestock grazing by land grant communities are supported and encouraged on National Forest system lands.

Grazing, particularly communal grazing, especially those on historically closed allotments, should be restored and at least managed so no net loss of grazing occurs.

BONIFACIO VESQUEZ - MERCED DE SANTA BARBARA LAND GRANT

The Santa Barbara Land Grant should get priority for this [cultivation] special use permit. Leonard Martinez and Juan Sanchez propose this remedy: consider adding a new management approach as follows: Consider converting vacant or understocked allotments near or adjacent to land grant communities into communal livestock grazing allotments.

LUCIA SANCHEZ - RIO ARRIBA BOARD OF COUNTY COMMISSIONERS

Proposes using definitions of grazing land ownership from 1848 Treaty of Guadalupe Hidalgo.

Bonifacio: Some allotments were closed with the understanding that they may be revisited. Long term Land Grant has permit. There was a communal allotment in Santa Barbara, Now the

people that benefit are outside the community. Communal allotments have smaller herds, smaller allotments. They serve the community rather than the larger ranching companies.

Lucia: Carson should consider the civil rights impacts. The ranching culture is rooted in history.

Michiko: What do you feel is the current barrier that prevents a group of individuals from having communal allotment?

Arturo: There are several factors. ATVs are cheaper to use than horses. Family lines died out. People move on.

Leonard Martinez: We have permittees on our board that are willing to help train.

TRADITIONAL FOREST PRODUCTS – 20 MINUTES

The objector states the need to provide local fuelwood opportunities (green, dead, and down) to meet fuelwood demands of Land Grant communities due to dependence of these communities on this resource and the need to coordinate with land grant governing bodies to develop a permitting process for traditional use forest products available on the forest:

- Fuelwood Plants, herbs and nuts for consumption and medicinal purposes
- Building materials including vigas and latillas
- Gravel, sand, and micaceous clay

The objector contends that the final plan uses prejudicial language for planning components that makes forest product uses specifically for traditional uses and fuelwood collection subordinate to other resources needs or planning components found in other sections of the plan.

OBJECTORS:

Leonard Martinez, San Joaquin Del Rio de Chama Land Grant – DID NOT PROVIDE A REMEDY

Juan Sanchez, New Mexico Land Grant Council

REMEDIES PROPOSED BY OBJECTORS

JUAN SANCHEZ - NEW MEXICO LAND GRANT COUNCIL

Incorporate the previously suggested plan direction (desired conditions, guidelines, standards, objectives, mgmt. approaches) relating to protection of culturally, socially, and economically important traditional resources within the three northern New Mexico forests.

- Maintenance of shared infrastructure with land grant-merged government entities

- Local fuelwood collection opportunities
- Timber, fuelwood, vigas and latillas native plant communities dominate the landscape
- Restore 12,000-15,000 cord objective local community partnership blocks
- Remove prejudicial language in the final plan that makes cultural significant and traditional uses such as fuelwood collection subordinate to other plan components or resource uses.

LEONARD MARTINEZ - SAN JOAQUIN DEL RIO DE CHAMA LAND GRANT – DID NOT PROVIDE A REMEDY

Lucia: We need to get a handle on all the ungulates. Cows are unfairly targeted for that degradation. Money for restoration need to address the glaring issue of elk. Need to open up more greenwood. Encourage more CEs to help meet ecological and community needs. Access for pinyon picking. There used to be free-use for grazing and fuelwood. There are issues, fees maybe nominal, but still sometimes too much. Also understanding process, especially with online permits.

We want access to building materials to be utilized for structures that were historically utilized. You can see it in structures. We need better access to building materials, especially with the spike in lumber costs.

We couldn't find any plan components to address this is subject, traditional uses are subservient to other uses. Concerned that "subject to other areas of the plan" means Acequia guidance document incorporate into plan. The MUSY phraseology is subordinate to other uses. Specifically called out that use MUSY be consistent with other parts of the plan. We recognize the need to balance uses, but this is the only area it is called out on.

ROS scope, not appropriate to apply to aesthetics. Creates conflict and subjugates us. We want to be incorporated equally. Feels like a subclass to other parts of plan. We are not pushing back on the mission but calling out that use is not constant. There is other prejudicial language. We look at this generationally. We have a duty to future generations.

Ongoing access and use. Living culture dependent on resources.

Leonard Martinez: This is a 20-year plan that took 6 years to make. It is important to understand that we are different than general public. Our asks are different. We want to sustain the next generation. It is generational. The plan should be a living product in order to sustain. We need all products, should be incorporated, included and a living document. It is a continual cycle for us.

GIVE INTERESTED PERSONS THE OPPORTUNITY TO PROVIDE INPUT

Todd Shulke, CBD: I want to talk about local contracts and wood products. There are small diameter opportunities, Fuelwood.net. Objection about providing contract to local communities and prioritizing local use is critical to getting projects on ground. Success for workforce development has been spotty. They get close to the language in CLFR. Collaborative groups are trying to get things done on ground and contractor officer. It has been hard to develop and maintain a local workforce. Provide guidance to Contract shop and contractors, that we will try first with local, we are likely to see more success over time. I also have some remedies to propose. Gather wood products in WUI boundary. Train people as silviculturists, arborists, ecologist. People need consistency, dependent. Help to build the capacity as stewards. Full education. Lift up an entire generation. It is happening all over the world. Forest Service is not doing it.

Bonifacio: We should go back and revisit special permit managed by Carson for Sipapu Ski basin and the proposed expansion. Working with plan, expansion be part of plan. There is an impact on community and environment. It should be part of the plan. Definitely big impact. Projected in next few years. The public depends on the Forest Service to due diligence.

Michiko: Next steps. I'll reiterate that all information gathered will be incorporated into my final response, if you haven't seen by May, maybe reach out. You have my sincere appreciation, personally and as part of the Forest Service team. Any final comments?

Valerie: The plans are on a level that cannot change anything. We may lose the forest in next 10 years. That will set context for everything else. We are in an accelerated decline, at the crux of human history, a bottleneck, degradation, I urge different approaches. We need information to govern. Consider the best science, call in experts to address shifting ground. I am available for the big picture. We need to maintain these incredibly precious resources.

Joe Romero, NM Stockmans Association: I thought the only people who could talk were the ones that have standing. I see there are people that do not have standing to make comments. There needs to be better communication about the process. My only comment is that I feel the county and land grants did good job of representing the grazing issues.

Michiko: To my knowledge we did not have anyone speak that was not either an objector or interested person.