

Carson National Forest

Inventory and Evaluation Portions of the Wilderness Process Comments and Response to Comments

About this Document

The Carson National Forest began the forest plan revision process in February 2014. As part of the revising its forest plan, the Carson NF must also inventory, evaluate, analyze, and recommend lands for inclusion in the National Wilderness Preservation System. The forest began this process in January of 2016 with the development of an inventory of lands that may have wilderness characteristics as defined by the Wilderness Act. The inventory was completed in March 2016. The forest then performed a qualitative evaluation of these lands for wilderness characteristics beginning in April 2016. The evaluation was completed mid-September 2016.

These first two steps were done with extensive input and comment from the public. The Carson held three public meetings to explain and gain feedback on the criteria to develop the inventory and received comment on the draft inventory which was posted on its website. The Carson NF then held 6 meetings to explain and gain feedback on how the criteria to develop the evaluation and received comments on the draft evaluation which was posted on its website. The Carson NF also attended three meetings at the invite of interested parties to take comments in person.

At each step of the inventory and evaluation the Carson NF asked the public if: 1) the criteria used to develop the inventory or evaluate were appropriate, and 2) if they were applied correctly or if they missed information which could affect either the inventory or the evaluation. Most of the comments answered one of these questions and helped inform the outcome at each step. Many other comments were determined to be related to the next steps in the wilderness process and will be considered when we get to those steps. These comments will be used to either help inform which lands we will carry forward in our draft forest plan and/or as potential alternatives to be analyzed for effects and in the analysis itself.

For each commented received we provide a response as to how the comment was considered. Comments were in general were considered:

- 1) As not relevant to the the wilderness process,
- 2) As used to inform the process used to develop either the wilderness inventory or evaluation,
- 3) As used to provide information that may or may not affect wilderness character of the different areas evaluated, and
- 4) As relevant to informing what areas we will propose as possible alternatives (including a proposed Wilderness recommendation) and/or the effects analysis of the alternatives.

Each comment response is followed by a number that corresponds to the source for the comment. To the best of our ability comments were transcribed as written by the original commenter. Separately we have provided to original comment letters, emails, and/or meeting input we received during these two steps.

Source Comments for the Inventory and Evaluation Portions of the Wilderness Process

Reference Number Date Received-Commenter or Public Meeting Location

- [1] 20160622-berde.
- [2] 20160627-onken.
- [3] 20160706-nmda.
- [4] 20160711-carpenter.
- [5] 20160711-sadow.
- [6] 20160712-landgrant-mtg.
- [7] 20160715-griego.
- [8] 20160715-imba. (International Mountain Bicycling Association)
- [9] 20160715-nmdgf. (New Mexico Department of Game and Fish)
- [10] 20160715-tws. (The Wilderness Society)
- [11] 20160721-miles.
- [12] 20160411-A.-E. mtg. (Amalia Evaluation Public Meeting)
- [13] 20160429-E.D.-E. mtg. (Eastside District Evaluation Meeting).
- [14] 20160413-M.-E. mtg. (Manassa Evaluation Public Meeting).
- [15] 20160415-P.-e. mtg. (Penasco Evaluation Public Meeting).
- [16] 20160408-T.-E. mtg (Taos Evaluation Public Meeting).
- [17] 20160401-W.-d. mtg. (Westside District Evaluation Meeting).
- [18] 20160729-nmwf. (New Mexico Wildlife Federation)
- [19] 20160222-archuleta.
- [20] 20160223-salazar.
- [21] 20160714-ostlie.
- [22] 20160715-amigosbravos.
- [23] 20160715-ostlie2.
- [24] 20160715-permitees-elrito.
- [25] 20160730-tws.
- [26] 20160113-sanchez.
- [27] 20160208-NNMSA. (Northern New Mexico Stockmen's Association)
- [28] 20160211-nmovha. (New Mexico Off Highway Vehicle Alliance)
- [29] 20160218-NMDA. (New Mexico Department of Agriculture)
- [30] 20160731-nmflb. (New Mexico Farm and Livestock Bureau)
- [31] 20160222-rioarriba-county.

- [32] 20160715-ostlie.
- [33] 20160715-wela. (Wild Earth Llama Adventure)
- [34] 20160223-macinnnes.
- [35] 20160223-inventory-TPCM. (Inventory Online Comments)
- [36] 20160620-barnett.
- [37] 20160715-interim-lg. (Interim Lang Grant Legislative Committee)
- [38] 20160720-rioarriba.
- [39] 20160120-Inv-Public-Mtg. (Inventory Public Meetings)
- [40] 20160223-lopez.
- [41] 20160816-nmaa. (New Mexico Acequia Association)
- [42] 20160816-nmcga. (New Mexico Cattle Grower's Association)
- [43] 20160816-taoscnty.
- [44] 20160210-miles.
- [45] 20160718-colfax.
- [46] 20160728-Evaluation-TPCM. (Evaluation Online Comments)
- [47] 20160707-trujillo.
- [48] 20160719-lopez.
- [49] 20160729-odonnell.
- [50] 20160816-nmac. (New Mexico Acequia Commission)
- [51] 20160816-sipapu.
- [52] 20160801-rab. (Rivers and Birds)
- [53] 20160223-letters-elrito.
- [54] 20160223-tang-smith.
- [55] 20160718-erlwca. (El Rito Lobato West Cattle Association)
- [56] 20160720-white.
- [57] 20160718-chacon.
- [58] 20160217-ucswcd. (Upper Chama Soil and Water Conservation District)
- [59] 20160727-cnwg. (Cebolla/Nutrias Watershed Group)
- [60] 20160915- riversandbirds.
- [61] 20160915-taospueblo.
- [62] 20160915-taosskivalley.
- [63] 20160915-townoftaos.

[64] 20160915-villageofquesta.

General Comments

Most of the areas evaluated were determined to be not suitable for wilderness in this draft document. We are concerned that by dismissing these watersheds from being suitable for wilderness protection we will lose the opportunity to fully protect our headwater streams that are vital to our communities. [1]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may be most appropriate during the development of plan components.

2) We belong to the upper Embudo Watershed, Santa Barbara and Rio Pueblo Watersheds- and disagree with the determination not to include these areas as potential for future wilderness. In particular- even excluding already open forest system roads used for ATVs and firewood- which makes sense- we support including all non-roaded forest lands in wilderness suitable lands.[1]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

3) These roadless areas- most which are adjacent to existing wilderness areas such as upper angostura and Alamitos and areas adjacent to the Pecos Wilderness (off Hwy. 518)-are critical to provide needed buffers to wilderness. These ecological buffer zones insure that wildlife has adequate habitat and connectivity and corridors between intact forest areas. [1]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

4) Buffer zones are also important to protect watershed values, to insure climate change resilience, and to protect against trespass from ATVs, etc. [1]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

5) Areas adjacent to the Pecos, Columbine, Hondo, Latir, Wheeler Peak, + Cruses Basin all deserve added protection to maintain watershed health and reduce threats from ATVs, mining, and un-regulated other uses.[1]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Access to and within National Forest lands is of critical economic and survival importance to local rural citizens for gathering home cooking and heating firewood, home and ranch building materials, tending their herds of grazing livestock permitted to graze on the Forest, harvesting piñon nuts, hunting and other associated activities critical to their subsistence.[2]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Lands identified as potentially suitable for wilderness under this process would be managed under the nonimpairment policy (36 CFR 219.10 (b) (iv)) and would result in greatly reduced access for resource management and multiple uses. This nonimpairment policy extends the protection of congressionally designated wilderness areas to recommended wilderness areas identified in this process. It is beyond the authority of USFS to manage an area as wilderness unless and until Congress actually designates such

areas pursuant to the Wilderness Act of 1964. NMDA is opposed to recommending any areas to include in the National Wilderness Preservation System because of the land management restrictions that accompany such a recommendation. [3]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Often times the driving purpose of the Northern New Mexico Policy as contained in the original policy as codified in the current Carson Forest Plan was not implemented to its fullest extent. The needs, wants, and desires of the local communities were not the overriding factors in the decisions leading up to the proposals. [4]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I think the other areas that you were not able to classify as wilderness should still be considered to have other protection. I believe it should not be open to everything, and some places can be managed different than others depending on what the character of the area is. Maybe certain designations such as, roadless, no bikes, no 4-wheelers, etc., to keep people from doing whatever they want would be helpful. Please keep in mind that the national forest and wilderness areas are not just for us and what we want but are set aside to keep the ecosystem in place and just because an area might not have all the characters of wilderness because of things we've built, tore down, burned, etc., that's not to say they will not go back to their natural state if we leave them alone and protect them from ourselves. [5]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

There has been ongoing distrust between the FS and the land grant communities over many decades because of the long history disputing the ownership of said grant(s) which has never been adjudicated in a court of law. The patriots of these land grant communities know that the Treaty of Guadalupe Hidalgo and the New Mexico Constitution state that the land belongs to the heirs in perpetuity. As we all know, this is not the case and the Department of Agriculture has been managing the land for 100+ years. Tension arises in most land grant communities every time Wilderness considerations are brought up because the heirs of land grants see it as a continued practice by the federal government to dispossess land grant communities of land and access to the resources of the forest. We are asking Congress and the USFS to develop policy that prohibits USFS and NGO's from designating Wilderness on Historic Land Grants in Northern New Mexico and Southern Colorado unless the Boards of Trustees, upon approval of their membership approve this action. [6]

CNF Response: Outside of the scope of forest plan revision.

Communities surrounding the forest are very concerned about the health of the forest and the likelihood of a catastrophic fire and how it would affect the main water source in New Mexico. The Forest Service has the obligation, whether legal, ethical or political, to manage these watersheds for the water security of traditional, forest dependent agricultural communities, and for the water needs of the entire State of New Mexico. [6]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

The concept of Special Management Areas is contrary to the General Provisions 49-1-2, NMSA 1978

which states: All land grants-mercedes in the state or land grants-mercedes described in section 49-1-2 NMSA 1978 shall be managed, controlled and governed by their bylaws, by the Treaty of Guadalupe Hidalgo, and as provided in Sections 49-1-1 through 49-1-18 NMSA 1978 a Political Sub-division of the state of New Mexico. [6]

CNF Response: Outside of the scope of forest plan revision.

Rural people in Northern New Mexico live close to the land. It is a part of our culture and heritage. We heat our homes with wood from the National Forests, we use recreation areas, trails, fish in local rivers, hunt in local Forests. It is part of our lives. [7]

The Multiple Use Policy has worked the best, with emphasis on the following uses:

- Grazing
- Special Uses
- Wildlife
- Recreation
- Timber Management
- Water Quality[7]

The needs of the people need to be considered carefully. The areas designated as wilderness areas would change current policy and be an impact on both residents and Forest users. Roads would be closed and not maintained. Fires would be allowed to burn. Timber sales would be nonexistent, campgrounds would be closed. Grazing of cattle and sheep would not be allowed. [7]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Sustainable and reliable economic growth opportunities can be realized, especially in rural communities through the development of trail based recreation on public lands. As such we would encourage the CNF to keep this opportunity forefront in their planning process and to embrace their role in facilitating that growth. [8]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may be most appropriate during the development of plan components.

...we encourage you to continue to develop partnerships with the community, including mountain bike constituents who can be a valuable source of on the ground expertise, are solution oriented and offer ample productive volunteer time in many aspects of trail development, design and maintenance. [8]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

The Department [NM Department of Game & Fish] does not believe that new wilderness designations are a mandatory component of wildlife habitat permeability. However, the Department urges the Forest to continue planning for landscape scale habitat connectivity that meets the needs for migration and dispersal of healthy wildlife populations on and around the Forest, and to address the requirements of the 2012 Forest Planning Rule. [9]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may be most appropriate during the

development of plan components.

The Forest Service is required to “[i]dentify and evaluate lands that may be suitable for inclusion in the [NWPS] and determine whether to recommend any such lands for wilderness designation.” 33 In evaluating potential wilderness areas, the agency must, among other things, “[e]valuate the degree to which the area may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.” And, “[s]uch features or values may include [r]are plant or animal communities or rare ecosystems,” with rare being “determined locally, regionally, nationally, or within the system of protected designations.” As described in detail in Appendix 1 to this letter, the representation of different ecosystem types in the National Wilderness Preservation System (NWPS) and other protected areas (e.g., Research Natural Areas (RNAs), ecological or botanical areas, or other conservation designations) is critically important to conserving biological diversity and ecological integrity. Because protecting ecosystem integrity and diversity is a central goal and substantive requirement of the 2012 National Forest System Land Management Planning Rule, the Forest Service must incorporate ecosystem representation information into its planning processes, including the wilderness evaluation process and consideration of designated areas pursuant to 36 C.F.R. § 219.7(c)(2)(v) & (vii). [10]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

To this end, we conducted an analysis of ecosystem representation to determine the proportion (%) of each wilderness inventory area that is composed of ecosystems that are inadequately represented in the NWPS. The results of our analysis (which are included and described in detail in Appendix 1) show that the Carson National Forest hosts numerous ecosystem types that are poorly represented in the NWPS both locally and nationally. [10]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The ongoing forest planning process presents the Forest Service with a crucial opportunity to begin to remedy that under-representation by prioritizing protection of diverse ecosystems through recommended wilderness and other conservation-oriented designations such as RNAs, ecological or botanical areas, etc. Only by utilizing ecosystem representation information to establish a network of recommended wilderness and other protected areas that represent the full expression of ecosystem diversity can the Forest Service satisfy the substantive mandates of the 2012 Planning Rule to provide for ecological sustainability, integrity, and diversity. [10]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may be most appropriate during the development of plan components.

We request that the Forest Service utilize the information in Appendix 1 in the wilderness evaluation documentation and environmental impacts analysis. In terms of the impacts analysis, we recommend that the Carson use this information when comparing alternatives for recommended wilderness. [10]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

We understand that the visiting Carson archaeologist just announced the five-year plan to identify all-

important archaeological sites, which Wilderness would protect. We find it remarkable that this is only now being done, but a conservative approach to protecting valuable cultural resources would be one that involved a broad and inclusive evaluation of wilderness character. [11]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

A great deal of the Carson is in need of forest management activity to insure forest health. If left potential major wildfire or insect destruction increase. [12]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may be most appropriate during the development of plan components.

There is a need for mechanized equipment to manage forest. [12]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may be most appropriate during the development of plan components.

Can current special use permittees continue their operations if the area is managed as wilderness? [12]

CNF Response: Yes, when that operation can be conducted in a manner that is consistent with the Wilderness designation.

Historic roads provide access whether intentional or encroachment and trespass effect wilderness characteristics in much of Carson, mining and grazing [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

A paved road would help the 88,000 acre RCCLA properties which has been attracting people/traffic from all over the world to Valle Vidal and RCCLA. [12]

CNF Response: Outside of the scope of forest plan revision.

Cull the elk herds to bring the elk population down to a manageable level. [12]

CNF Response: Outside of the scope of forest plan revision.

Valle Vidal: Keep track of all permits sold to hunters for elk, bear, deer, bobcat, and have information available for public review. [12]

CNF Response: Outside of the scope of forest plan revision.

Part of our watershed is in the Valle Vidal [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Stop bringing cattle to the VV in the summer months. Cattle and cattlemen on horses in summer push the over abundant elk / deer down to our valley where tear down our forests and eat our crops. [12]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Stop cougar hunts in VV [12]

CNF Response: Outside of the scope of forest plan revision.

We want the CNF to pave road between Amalia and Cimarron. There already exists an argument with the Rio Costilla cattlemen & livestock association (RCCLA) that the forest service is maintain road leading up to the Valle Vidal __ on west entrance. [12]

CNF Response: Outside of the scope of forest plan revision.

Limited roads and access is needed as well. [12]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

We need more wood hauling areas green and dry. [12]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

What are the consideration for those who are physically unable to utilize the wilderness. [12]

CNF Response: A mobility impaired person can visit and enjoy a wilderness area using a wheelchair or other mobility device designed solely for use by a mobility-impaired person and that is of the type that is commonly used in indoor pedestrian areas.

Does the USFS consider the land grant communities who had multiple uses for forest lands? What degree or weight is considered. [12]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

Does wilderness designation preclude future land exchanges? [12]

CNF Response: No, land exchanges are authorized by Congress.

Does it preclude stream improvement work? [12]

CNF Response: No, but generally work in a Wilderness area must be done without motorized or mechanized equipment and must maintain an area's wilderness character.

Does it prevent work on endangered (threatened) species? RCCTT? [12]

CNF Response: No, but generally work in a Wilderness area must be done without motorized or mechanized equipment and must maintain an area's wilderness character.

There are always signs of evidence of human activity in proposed wilderness areas due to the nature of the history of the area. [13]

CNF Response: That is often true, man has been most places on this earth and left some evidence of his presence. Wilderness is defined by the 1964 Wilderness Act as, "an area where

the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain.” Wilderness is “undeveloped”, retains “its primeval character and influence, without permanent improvements or human habitation”, and “generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable”. Areas with past human activity may still meet this definition.

I'm not sure that it matters if an area has been used for hunting and fishing. These are allowed in wilderness area and I'm positive people have hunted and fished in just about every acre of the forest. [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

We need to have access to ALL traditional uses: * forest products * camping *grazing *herb gathering [13]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The forest doesn't manage the land that is now wilderness. How will they manage more? [14]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Concerns about putting more traffic (ATV, motorized) on a smaller portion of the forest if more wilderness is allowed. [14]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Concerns of current grazing management because of not being allowed to use motorized equipment to maintain dirt water tanks. [14]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

My concern for wilderness areas are vehicles, ATVs, etc not being permitted. I love our wilderness areas, but for permittees, hunters and people that use the land for traditional uses, it restrict them greatly. Just a consideration for traditional uses would be great. [14]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Wilderness – restriction and more government control. [14]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

With the expansion of wilderness areas comes a heavier concentration of people and uses in smaller areas. With that comes a destruction of the source. How is this to be managed and considered. [14]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I feel that those of us who use the land have no voice, while environmentalists and hippies get what they want. [14]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Unconfined recreation is limited to young and healthy and eliminates a large portion of the population. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Acequia should be respected and consulted with respect to historical head waters. [15]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

If there is a sustainable future in NM, it will be based on the irrigated acreages. The sources of the acequia water are a high quality water resource. [15]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may be most appropriate during the development of plan components.

Potcreek needs to be cleaned from the willows so you could see the river and how nice it winds like a snake. We have lots of beautiful country here in New Mexico. [15]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Right side of Hodges campsite – camp looks like an empty field. No restrooms, no tables, no grills. Not leveled. Hodges campsites looks like the Wild West. [15]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Road needs major repair – upper Llano past the Randy Shads gravel pit. Extremely dangerous driving conditions. Road has deep ruts, and boulders, pointy, large, small, large rocks. These areas I have enjoy this area for solitude. [15]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Santa Barbara Land Grant – for solitude – recreation – getting wood, herbs [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

All areas considered for local commercial forest projects creating Jobs [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Certain dirt roads have to be and should be maintained for pulling material for fixing fences, gathering fire wood, building materials. [15]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Designated management areas need to remain designated and not be made into wilderness. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Everyone wants to protect our forests, land grants and lands that belong to the public. Wilderness is as explained to us limits most people? Public lands are just that (public lands). [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

FS doesn't have to budget funds for wilderness management [15]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

How are we going to be able to continue the upkeep of our acequias if this is turned into wilderness. Wilderness is considered no power tools. [15]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Preserve adequate wilderness to maintain intact a healthy, functioning web of nature that provides water catchment, seed dispersal by animals, breeding grounds for aquatic and land animals, nesting and roosting and feeding areas for birds. Also, places for solitude and inspiration for humans. Also, avoid any loss of current biodiversity. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Wilderness protects the land, water, ecosystem for future generations. It is sacred. Yes, there should be diverse usage of the forest – places for everyone, different usage. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Fees charged on grant land should be used by land grant boards. [15]

CNF Response: Outside of the scope of forest plan revision.

Honor all agreements that were made with the land grant heirs. We want to be entitled to get wood free from our own land. Benefit from money the government makes off our land. [15]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components or outside of the scope of forest plan revision.

If there is a proposal for a wilderness for this regions the community should be given the opportunity to walk the areas with your staff if the community wants and then we can go from here. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

If these land grants are to be managed at all, they should manage for the benefit of the 'local community' who 'own' them. These are 'NOT' federal lands so are outside the FS's jurisdiction to manage. [15]

CNF Response: Outside of the scope of forest plan revision.

Let the land grant heirs manage the land grant common lands now under FS management. [15]

CNF Response: The Forest Service is responsible for the management of National Forest System lands. Collaborative opportunities with land grants and other entities will be addressed as part of plan development.

Local folks have historical rights guaranteed under the Treaty of Guadalupe Hidalgo. [15]

CNF Response: Outside of the scope of forest plan revision.

Our people, meaning land grant heirs, were given written permission to use this land, to get our wood, and resources. How can we do this if it becomes wilderness. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Shared management of forest, i.e. non wilderness) lands should be considered between USFS and traditional, land grant local communities [15]

CNF Response: The Forest Service is responsible for the management of National Forest System lands. Collaborative opportunities with land grants and other entities will be addressed as part of plan development.

Start honoring agreements made with land grant heirs when their lands were stolen. [15]

CNF Response: Outside of the scope of forest plan revision.

The 'common lands' of Santa Barbara and Las Trampas cannot be 'sold' or traded outside the land grant. [15]

CNF Response: Outside of the scope of forest plan revision.

These lands being considered for evaluations are not 'public lands' and should not be considered for evaluation in the management plan. [15]

CNF Response: Outside of the scope of forest plan revision.

Wilderness designation should not be done before traditional, land grant local community uses are designated. [15]

CNF Response: Outside of the scope of forest plan revision.

Are there any characteristics that have been assessed within Merced by heirs. How could heirs be involved with inventory assessments. How will you include heirs. I would like to be involved directly on the ground. Watershed has directly been and intentionally diverted RIO Pueblo affecting natural and reintroduced animals, i.e. beaver, Rio Grande cut throat, etc. Wild land urban interface need to be addressed jointly. [15]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may be most appropriate during the development of plan components.

Are there any heirs (heirs?) involved in identifying areas [15]

CNF Response: Yes, many land grant heirs have attended wilderness public meetings. The NM Land Grant Council has convened several meetings for affected land grants in which Carson NF planning personnel have participated. The NM Land Grant Council is part of the Carson NF government working group. Heirs, other traditional users, and local communities will continue to be involved in the Wilderness recommendation and plan revision processes.

I would like to be involved in creating NEPA, WUI, fuel inventories. [15]

CNF Response: Outside of the scope of forest plan revision.

Please contact when maps are ready. [15]

CNF Response: Evaluation maps are posted on the Carson NF website and at district offices. Everyone on our forest plan revision mailing list has been notified.

Work on a plan that will address management of common land year by year for 20 to 30 years. [15]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

All efforts should be jointly and strategically managed. [15]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Carson hotshots were originally created in Peñasco to create and partially employ economically

depressed areas. [15]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

Catastrophic fire is greatest concern of public to clean watersheds. [15]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

Development of methods for thinning existing wilderness with minimal impact. There must be ways of thinning without extensive road building. [15]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Fuel wood permits should be allotted and distributed by the boards of the two 'land grants' in this district. [15]

CNF Response: Not directly related to Wilderness recommendation. The Forest Service is responsible for the management of National Forest System lands. Collaborative opportunities with land grants and other entities will be addressed as part of plan development.

I am a grazing permittee and I know that grazing keeps fuel grasses from becoming a disaster in fire. [15]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

I think that fuel wood gathering helps to control wildfires by clearing out dead and down fuel. [15]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Livestock in the forest helps our wilderness in many ways. Some wild animals are feed by livestock, ____ help the land, and they also look beautiful when you pass by on the highway in the US hill. [15]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

Management plans as far as thinning and harvest lumber should be structured and a mapped area of the whole Carson region by region, peaks and valleys [15]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

Need other agencies within grant to sponsor, SWWF, crew, youth corp. [15]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

Post each area in forest – start – end [15]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

The community need to address invasive species, i.e. juniper thistle, mistletoe – consider areas to strategically identified for joint management. [15]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Thin and harvest common lands depending on fire hazards [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

We should have more employment within our FS which the presence alone will make a difference within respect. [15]

CNF Response: Outside of the scope of forest plan revision.

I love Smokey Bear [15]

CNF Response: Me too.

evidence of fire suppression? [16]

CNF Response: Noticeable suppression and rehabilitation activities, such as dozer lines, were considered during Evaluation and are addressed in the documentation of the Evaluation process and rational. The impacts on current management approaches of ecological effects from past fire suppression will be considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

evidence of high-grade logging? [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Can a smaller size provide critical landscape scale function. [16]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Research shows grazing and timber cutting keep the ecology of the forest support wildlife and livestock. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Are there areas where ecological characteristics are close/near to reference conditions [16]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

Historic – traditional – uses important!! [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Water is a key resource affecting entire communities. many of areas within the Carson are in “severe” fire risk state. Thinning and logging are required to maintain the watershed. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Condition of watershed – can it be sustained/improved [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

ESA restoration capability [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

What tools will be allowed to manage watershed? [16]

CNF Response: Only non-motorized, non-mechanized tools are allowed in designated Wilderness.

Will stock tanks be maintained with what tools? [16]

CNF Response: Only non-motorized, non-mechanized tools are allowed in designated Wilderness.

Will the FS designate staff to have a more hands on approach to managing grazing permittees? [16]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Land along Hwy 150 is critical for fire mitigation, along with land for the village of Taos Ski Valley, and along the Bull Of The Woods trail. [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

I recommend the Middle Fork Road remain decommissioned permanently. For that road to be reopened would destroy the access that people can go as a day hike to experience wilderness beauty. [16]

CNF Response: Project level decisions are outside of the scope of forest plan revision.

I would like to know if the inventory of areas with characteristics include the proposed wilderness expansion of inventoried roadless areas adjacent to the Pecos Wilderness area. [16]

CNF Response: Evaluated areas C14v and C14x were determined to have Wilderness character.

If Valle Vida remains forest service there is a possibility that we could get a paved road from Cimarron to Amalia that would bring opportunities, jobs to an area that has suffered economically, especially now that the mine in Questa has closed. [16]

CNF Response: Outside of the scope of forest plan revision.

Valle Vidal is also part of the watershed for Amalia, Costilla, Jaroso (?) our reservoir is located. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Valle Vidal should remain USDA Forest Service. [16]

CNF Response: Outside of the scope of forest plan revision.

We (the town) depend on the \$ made from people riding jeeps, ATV, motorcycles in the forest. The town would die without these riders. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

2/4 wheelers make no more impact than a herd of horses/pack mules. People that spend \$25-30K on ATVs are usually very responsible. They're not the ones carving their initials in aspens along the trail. [16]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

None of this in the Carson qualifies under 1964 rules. [16]

CNF Response: The evaluation follows the 1964 Wilderness Act definition of Wilderness.

You are proposing a disservice to the public to consider this at all. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

If a fire happens we need to fight it. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

No new roads in roadless areas ever [16]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

Wilderness should be a proactive means of achieving [16]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

There is a need for MORE recreational opportunities, not less. Where do you address that? [16]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Canjilon Lakes and trout Lakes are already developed. [17]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

NMWF agrees with the proximity of lands identified as having wilderness character to existing wilderness areas as this will be easier to incorporate these areas into existing wilderness than it would be to start from square one. [18]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

My ancestors date back to the 1700s they established road to visit people in other communities, to gather wood, to graze their sheep later cows there's a lot of historical sites, watering tanks, resting area, etc. [19]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I think Yellowstone was a disaster [19]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

Why has it taken the FS here in northern New Mexico 52 years to bring up the wilderness issue if it was a mandate by the Wilderness Act passed in 1964? Why wasn't it brought up during the on or about 1980 Forest Plan Revision Process? [20]

CNF Response: The Carson NF is required to complete the Wilderness recommendation process as part of forest plan revision under the 2012 USFS planning rule.

While I'm disappointed that you were not able to classify more of the land up for evaluation to have wilderness character, I support all the acres you are able to add. [5]

CNF Response: The evaluation of wilderness character was conducted as required by Chapter 70 of the planning rule directives and is based on the 1964 Wilderness Act.

There is the legal definition [of wilderness], but there is also a definition that comes from my heart. I have been reading various nature writers as I was considering what I wanted to say about wilderness and its place in the Carson National Forest, and I have found a writer named Robert Macfarlane from Great Britain who has a definition of wilderness and wild places in his collection of essays, "The Wild Places", (@ 2007) that works well for me. On page 30 he writes, "Wildness...is an expression of independence from human direction, and wild land can be said to be 'self-willed' land. Land that proceeds according to its own laws and principles, land whose habits - the growth of its trees, the

movements of its creatures, the free descent of its streams through its rocks - are of its own devising and own execution. Land that, as the contemporary definition of wild continues, 'acts or moves freely without restraint; is unconfined, unrestricted'." In a history of the concept of wilderness, on page 31, he compared Beowulf's antagonism for wild places with the Celtic monks' embracing of wild places. "The Old English epic poem 'Beowulf' is filled with what the poet calls 'wildeor' or 'savage creatures'... It is against these wild places and 'wildeor' that the civilization of Beowulf's tribe, the Geats - with their warm and well-lit mead halls, their hierarchical warrior culture - sets itself... Parallel to this hatred of the wild, however, has run an alternative history: one that tells of wildness as an energy both exemplary and exquisite, and of wild places as realms of miracle, diversity and abundance." [32]

There are many places in the Carson National Forest that are appropriately managed for multiple uses, and only a few places that could be managed as wilderness. Because many users of the forest are passionate about having the particular way that they use the forest, whether it is for hiking, riding horses, ORV, motorized, or mechanized use, hunting or angling, or extraction for personal, cultural, or community uses, be available to them in any part of the forest, there is a great deal of pressure on the plan revision process to make all of these uses available on all of the forest. What this pressure does not take into consideration is the intrinsic value of wild and isolated places within the forest to provide habitat for common and rare native plants, animals, insects, fish, and other types of wild life. It does not consider the importance of corridors for both plants and animals to be able to migrate, both seasonally, and over large blocks of time because of these decades of drought and centuries of climate change. As Robert Macfarlane writes on pages 306-307, "So few wild creatures, relatively, remain in Britain and Ireland: so few, relatively, in the world. Pursuing our project of civilization, we have pushed thousands of species towards the brink of disappearance, and many thousands more over that edge. The loss, after it is theirs, is ours. Wild animals, like wild places, are invaluable to us precisely because they are not us. They are uncompromisingly different. The paths they follow, the impulses that guide them, are of other orders. The seal's holding gaze, before it flukes to push another tunnel through the sea, the hare's run, the hawk's high gyres: such things are wild. Seeing them, you are made briefly aware of a world operating in patterns and purposes that you do not share. These are creatures, you realize, that live by voices inaudible to you." And often the best place for all forest users to encounter these creatures and plants is in the wilderness. Seeing bear scat every 30-40 feet in the far reaches of the Pecos is an edgy experience, to be sure, but still one that I value highly. Finding mountain lion prints on the mesas of the Rio Chama and hearing wolves howl in the Gila reminds me of how small my own place is on this earth, but how sweet that place is when I can be in wilderness with these large creatures. Watching the tiny and endangered Zuni Bluehead Sucker dart after water striders is an experience I will never forget, even if it is not in the cards for me to climb down into that canyon again. Hugging a +40" in diameter blue spruce, corny as it sounds, makes me feel as old and alive as the mountains in which it grows. [32]

The anti-wilderness sentiment does not value the experience of the forest as a place for solitude and the enjoyment of a wilder experience than the groomed and overused trails and roads in the rest of the forest allow. At my age, I am lucky to be able to hike into wild areas for only a few miles, but it takes less than a mile for me to feel like I am having a unique and unpredictable experience. And I would not say that I am a particularly adventurous person, but it is something that I want my and others' children and grandchildren to be able to have. As I was reading "The Wild Places" by Robert Macfarlane, I discovered the history and value of wild places, even in so settled and populated a place as the British Isles. About special, wild places, he wrote on page 236, "These were the markers, I realized, of a process that was continuously at work throughout these islands, and presumably throughout the world: the drawing of happiness from landscapes both large and small. Happiness, and the emotions that go by the collective noun of 'happiness': hope, joy, wonder, grace, tranquillity and others. Every day, millions of people found themselves deepened and dignified by their encounters with particular places." He also discusses the effect of wilderness on the human spirit by quoting Samuel Taylor Coleridge on page 209, "In the letters, poems and journal entries that Coleridge wrote over the course of those months, we can see him beginning to think out a new vision of the wild... Wildness, in Coleridge's account, is an energy

which blows through one's being, causing the self to shift into new patterns, opening up alternative perceptions of life." If Coleridge can see the effect of wild places on the human spirit and MacFarlane can value such small pieces of wild places in the British Isles, surely we can set aside a few additional wild places for our own spirits and our grandchildren's spirits in the relatively large confines of the Carson National Forest. [32]

One of the arguments put forth by those who oppose identifying any more wilderness in the Carson NF is that people who do not live in the immediate area of the land identified as eligible for inclusion in the wilderness inventory should not have equal standing with those who do happen to live in that area. These are federal public lands owned by all of the people of this country, including future generations who will benefit from their protection, and these lands need to be managed for the benefit of all of the citizens of the United States. The forest is also mandated to be managed for the benefit of the plants, animals, the watershed, and the scenic, cultural, and historic areas contained in the forest. These have an intrinsic value that is not often mentioned by those opposing wilderness. The effect of forest planning on local communities is an important consideration, but only one of many considerations. As Macfarlane writes in *The Wild Places* on page 82, "In 1960, the historian and novelist Wallace Stegner wrote what would become known as 'The Wilderness Letter'... In it Stegner argued that a wild place was worth much more than could ever be revealed by a cost-benefit analysis of its recreation economic value, or its minerals and resources. No, he explained, we need wild places because they remind us of a world beyond the human. Forests, plains, prairies, deserts, mountains; the experience of these landscapes can give people 'a sense of bigness outside themselves that has not in some way been lost... But such landscapes, Stegner wrote, were diminishing in number. The 'remnants of the natural world' were 'being progressively eroded'. The cost of this erosion was incalculable. For if the wild places were all to be lost, we would never again 'have the chance to see ourselves single, separate, vertical, and individual in the world, part of the environment of trees and rocks and soil, brother to the other animals, part of the natural world and competent to belong in it'. We would be 'committed wholly, without chance for even momentary reflection and rest, to a headlong drive into our technological termite-life, the Brave New World on a completely man-controlled environment'." While this can seem like a pessimistic viewpoint, if you consider the date of the original wilderness letter by Stegner, our current alienation from the natural world and obsession with technology makes it apparent that this viewpoint is now more accurate than pessimistic. While nature is resilient, the effects of mismanagement, population increase, and climate change can cause the earth's ability to rebound to be compromised, perhaps irreversibly. On page 227, Macfarlane writes, "That margins should be a redoubt of wildness, I know, was proof of the devastation of the land: the extent to which nature had been squeezed to the territory's edges, repossessed almost to extinction. But it seemed like proof, as well, of the resilience of the wild - of its instinct for resurgence, its irrepressibility. And a recognition that wildness weaved with the human world, rather than existing only in cleaved-off areas, in National Parks and on distant peninsulas and peaks; maybe such a recognition was what was needed to help us end the opposition between culture and nature, the garden and the wilderness, and to come to recognize ourselves at last as at home in both..." If protecting these special places can be accomplished by our generation, that will leave our public lands like the Carson National Forest, and our world, a richer, more diverse and resilient place for everyone. [32]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

We agree with the Forest Service's conclusion that these areas have wilderness character, and urge the agency to carry these lands forward for consideration in the analysis. [10]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis

of alternatives.

New Mexico has the least percentage of wilderness, of all the western states, (with the exception of Utah), with only 2% of our public lands protected as wilderness, in contrast to Colorado (3%) and Arizona (4%). We have a unique opportunity, with the revision of the Carson Plan, to change that statistic, and add some more lands to the public's National Wilderness Preservation System. [33]

Ensuring that lands with wilderness character are included in this inventory is critical, in terms of how these lands are to be managed. Lands with wilderness character should be managed as wilderness, to protect their wilderness character, so Congress may have the future ability to enter these lands into the National Wilderness Preservation System. [33]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Thank you for selecting additions north of the existing Pecos Wilderness and for acreage within the Valle Vidal that the Carson identified as possessing wilderness character. [11]

CNF Response: The evaluation of wilderness character was conducted as required by Chapter 70 of the planning rule directives and is based on the 1964 Wilderness Act.

* already roadless areas should definitely be wilderness* [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I am not an outsider – not a native, but I have lived in and loved this area for over 35 years – and I do support wilderness designation. I want my grandchildren to be able to see natural areas untouched by human activity. I would like to know what the land grant heirs consider to be the standing of the Picuris people, whose ancestors were using these lands when the King of Spain saw fit to grant them to his subjects. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I support as much wilderness as possible [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Provide as much wilderness as possible, consistent with leaving adequate areas for traditional local uses in sustainable quantities. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

...NMWF emphatically encourages the USFS to stand fast on your findings. The lands you labeled as having wilderness characteristics are worthy of wilderness designation. In the opinion of our organization, is that there is far more land that deserves protection if not in the way of wilderness, under

legislation that would permanently protect these lands from extractive industries. [18]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

I would ask you to provide Wilderness Designation to as much area as possible so that my children and grandchildren can experience truly wild areas on foot, and maintain diversity in ecosystems that sustain the land and the living things + people. All of this area should be protected from oil + gas extraction that would endanger our precious water resources and air quality – no compressor stations or pipelines must be permitted. [34]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I believe in adding as much wilderness as possible in a time when people are more and more relying on mechanized transportation. The value of setting aside places that will not be affected by humans is invaluable. The Wilderness Act of 1964 states “In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition, it is hereby declared to be the policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness” The more we do to protect those lands with wilderness character now the better. [35]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I am opposed to further wilderness area designation. The proposed action is pre-mature, misguided, and detrimental to New Mexico. The USFS fails to fully account for all users of these public lands and reacts to the demands of a small vocal minority of users. [36]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Proposals for expansion of existing or designation of new National Wilderness Areas are NOT the best options for scientifically and responsibly managing watersheds because restricting or prohibiting motorized access would: [2]

- A) Hamper effective and economic control of wild fires.
- B) Lessen efficiencies in implementing prescribed controlled burning for reducing flammable fuels and make such operations much more expensive.
- C) Prevent the use of chain saws and other mechanized equipment for controlling vegetation density and fuel loading.
- D) Preclude access with trucks, pickup trucks, trailers, etc. by local peoples for the gathering and harvest of fuel wood and other forest products they have depended upon for centuries for their subsistence and well being.
- E) Prevent effective vegetation management activities including forest stand thinning and tree removal

to maintain forest health and vigor, reduce susceptibility to insect epidemics, reduce infestations of forest pathogens (tree diseases, dwarf mistletoes, etc.), decrease water loss from evaporation of snow accumulations in forest canopy, manage rate of spring snow melt and runoff, and increase water yields from managed watersheds. That said, little or no management, such as in designated Wilderness is indeed extremely counter-productive to good watershed health. [2]

For the reasons stated above and for genuine concern toward sustaining the rural traditional cultures of Northern New Mexico, I join with the local citizens within and adjacent to the boundaries of the Carson and Santa Fe National Forests in adamantly opposing the expansion of existing, or designation of any new Wilderness areas. [2]

I challenge the validity of the Carson NF recent analyses on the basis that: (a) the "Wilderness Character" of proposed designations stretch far beyond reasonable or legal interpretation of criteria set forth in the 1964 Wilderness Act and/or the 1978 Endangered Wilderness Act; and (b) proposed designations fail to provide reliable detailed economic analyses including cost-benefit relationships, economic and social impacts and perturbations to the historic cultural life styles of long standing adjacent Hispanic villages and communities. [2]

CNF Response: The definition of wilderness character is as required by Chapter 70 of the planning rule directives and is based on the 1964 Wilderness Act. This comment will be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The local communities in general have been opposed to additions to the current wilderness areas. Some of the reasoning includes land grant issues, the treaty of Guadalupe Hidalgo, and a lack of involvement with the local communities. Granted there are individuals in the larger communities such as Taos desiring to increase the size of wilderness areas. Also the larger population centers of New Mexico and the coast lines of the United States often desire more wilderness areas leaving out the *local* population desires. [4]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

We believe that Wilderness, no matter how high in altitude, will impact our watershed. The Pecos Wilderness expansion (as it did in the 1980's) is a violation of the Santa Barbara and Las Trampas Land Grant pre-territorial water rights under the Treaty of Guadalupe Hidalgo, Article 8. [6]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

A Wilderness expansion would impair the Right of Way to our acequias head gates protected under the Mining Act of 1866. [6]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The proposed Wilderness expansion will hurt an already poor economy in this area, and will also negatively impact a once thriving cattle industry. [6]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis

of alternatives.

IT WOULD CHANGE OUR WAY OF LIVING:

No more grazing in that area. No more wood gathering. Roads would be closed. Fires would be allowed to burn. HUNTING would not be allowed. fishing would not be allowed. Campgrounds would be closed. I come from a family who for many generations have utilized the forest and it would be huge change in our lives, It is a part of our culture and heritage. [7]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I cannot see even one positive point in designating these areas as wilderness. [7]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Where there are existing multiuse/bike trails, or where the terrain is suitable for future bike trail development, and/or where there is an identified (by the public or agency) need for connectivity of the regional trail network, we advocate for alternative land protection designations rather than defaulting to the most restrictive designation of Wilderness. Designations that serve as companions to Wilderness such as National Recreation Areas, Wild and Scenic Rivers, Special Management Areas can and often strike the right balance of environmental protections coupled with flexible and diverse public access and recreation. We recommend that the evaluation process consider the development of additional sustainable trails and access points, enhanced programs to encourage greater group education/visitation diversity and development of a full spectrum of mountain bike optimized trails in appropriate places. Just as Wilderness advocates wish to have a remote backcountry experience, mountain bikers too wish to have that primitive experience, and should not be restricted due to the lobbying efforts and pressure of other user groups. [8]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

...we urge CNF staff to engage with mountain bike advocates in order to proactively plan and develop increased mountain bike access that is well designed and meet the needs of the community so that it is sustainable and desirable. Further future Wilderness designations via recommended wilderness classifications would only likely lead to potential restrictions on potential mountain bike access, which you have stated is already limited. [8]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

...the [Land Grant] committee voted nine to one to place on the record its opposition to any expansion of existing wilderness areas or the creation of new wilderness areas as part of the current forest plan revisions for both national forests. [37]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The Department [NM Department of Game & Fish] acknowledges the value of wilderness and roadless areas to populations of wildlife on the Forest. However, wilderness designations also impose additional administrative burdens that can inhibit the ability of the Department and the Forest to implement native fish conservation actions detailed in the Rio Grande Cutthroat Trout Conservation Agreement (2009) and Rangewide Conservation Strategy for Rio Grande Cutthroat Trout (2013). Important conservation and restoration activities include constructing fish passage barriers, removing non-native fish, stocking native fish species, and other fish management activities. While these activities may not be strictly excluded from designated wilderness lands, requirements for working and operating in wilderness areas may increase costs while decreasing the scope, efficiency, and effectiveness of these important restoration actions. Similar considerations apply to beneficial forest habitat management treatments that are jointly identified by federal and state resource managers to address areas that have significantly departed from natural conditions. [9]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

RIO ARRIBA CITIZEN'S LIVELIHOODS, RELIGIOUS FREEDOM AND OVER ALL WELL BEING, GOOD WATER, SAFETY AND FREE DOMS MUST BE CONSIDERED AND PROTECTED NOT ELIMINATED OR DIMINISHED AS WOULD HAVE THIS UNNAMED WILDERNESS FORCE AND DO. [24]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

First and foremost, our concern is that 81% of the WSA acreage also lies within active grazing allotments. The 19% of WSA acreage outside of allotments mostly surrounds Ghost Ranch in the western portion of WSA-W3 l d. These grazing allotments represent lands that are also used by our people for hunting, firewood, flower & herb gathering, recreation, and watershed management. To consider any Wilderness designations within these areas is, in our opinion, an unacceptable and incompatible use of this working landscape. As you well know and have been reminded often during recent public meetings, the people who reside in our forested communities deeply value the communal and multi-use access to these lands as they have for centuries. The values embodied in this local cultural heritage are the fibers that hold these communities together. Further regulation and restriction of use and access to these areas would be seen as a taking of local resources and would detrimentally affect these communities. This should be taken into account when considering the future manageability of these lands. [38]

Secondly, we are concerned with the always present threat of wildfire throughout our forests, including the proposed WSAs. These areas are all presently prone to the risk of wildfire and without the ability to perform ongoing thinning and clearing; they will be at an increased risk of catastrophic fire. Given the proximity of these WSAs in relation to our rural communities and working landscapes, we cannot afford the increased risk of not being able to actively manage the forests. [38]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Ultimately NO MORE WILDERNESS!! [39]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis

of alternatives.

I think there is already too much wilderness areas (designated) [39]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

At the end of the evaluation process I feel that the CNF should “NOT” recommend additional wilderness areas. [39]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Conditions of the forest (over growth) should be considered and instead of creating more wilderness maybe proposals should be made for funding to hire groups like Rocky Mountain Youth Corp to thin. This would also improve economic conditions in the area. The danger of a catastrophic fire is becoming more of a threat every year. By increasing the acreage of the Pecos Wilderness the danger increases. [39]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Access – Wilderness means many things to many people. One is exclusion. Wilderness status means only wealthy people with horses and trailers can access the area. lower income residents of the neighboring communities are excluded with no motor vehicle access. Let the people in. Improve access do not restrict access. [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Activities like CFRD grants and other initiatives would not allow improvements on land. [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I think we already have too much wilderness areas [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Use of mechanized equipment is essential to insuring the ability to achieve a healthy forest. [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

With the addition of the Rio Grande del Norte National Monument, and the designation of the Columbine-Hondo wilderness, and all of the other federal lands in Northern New Mexico (USFS,

BLM), I don't see a lot of opportunity for new wilderness designations. [13]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I have been on the ground in the FS in Valle Vidal, Tusas and Lagunitas with sheep and cattle grazing for about 45 years, my dad and grandpa before me. And I think we should not make the changes that draws too many new people to all these areas. Also wilderness should be something that stays in the higher elevations. [14]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Federal land belongs to all of the people, but when it becomes wilderness, 95% of the people (owners) will never see this land which they own. [14]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Wilderness is a permanent decision which does not allow new science to reverse practice. This eliminates necessary tools for management [14]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Protect all wildness as is. Protect our watersheds. Keep all this healthy. None of these should be used or designated as wilderness. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The wilderness act is a really bad idea because the Spanish American communities have sustained a cultural relationship with the land and, because of our economic relationship, we are a forest dependent people. As a community member of the Peñasco area. the wilderness will close roads that the people need to get wood. Wood and propane are the only fuel sources we have, taking our forest means that people not be able to get wood for the winter, which is a traditional resource procurement – access of natural resources by a collection of people who compose a society that developed a culture of habitat, that is to say, sustainable use of their geographic space to where they did not overwhelm nor were overwhelmed. Examples include accessing fuel wood for home heating and diversion of water into acequias. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Watershed in lands being considered for evaluation should be removed from evaluation and consideration as 'wilderness.' [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Any common lands that were taken by forest should be returned to the land grants. I don't see any reason to take any common lands and charge them into anything. The Santa Barbara and Trampas land grant should be taken out of your equation. Keep our common land as is. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Any overlap of a land grant should not be considered for wilderness area – it is clearly shown on the FS maps. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I adamantly oppose any additional wilderness designation. ALL land grant land (Santa Barbara/Las Trampas) should not be considered. Also, any additional wilderness would greatly increase the danger of a catastrophic fire in our watershed because policy is such that it would be allowed to burn. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I think that land grant properties should not be considered as wilderness area, regardless of who manages it now! [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

No common land grant land should be considered for wilderness [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

As an avid mtn biker I would urge the FS to remember that the idea of “wilderness” is older than mtn biking, but that using mtn bikes is not incompatible with the idea of wilderness. We do not impact the land any more than equestrians, possibly less, yet horseback riding is okay but biking is not. I would not like to see wilderness designated anywhere that a trail used by the mtn bike community exists. This includes the CDT. I urge you to consider designations other than ‘wilderness’ where we can recreate. Thank you. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Motorized access should be allowed and disabled/handicapped individuals should not be discriminated against. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Motorized vehicles needed for acequias and looking for cattle. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Fire management – great departures on treatable forest types might benefit from different designation than wilderness. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

RESOLUTION OF THE NORTHERN NEW MEXICO STOCKMEN ASSOCIATION JANUARY 9, 2016 REQUESTING THAT THE NEW MEXICO CONGRESSIONAL DELEGATION IN CONJUNCTION WITH THE

UNITED STATES CONGRESS REFRAIN FROM EXPANDING "WIDERNESS DESIGNAITIONS" SPECIFIAALLY THE EXISTING PECOS WILDERNESS LOCATED IN NORTHERN NEW MEXICO: Whereas, the federal Wilderness Act of 1964, through policy and administration actions prohibits access via the use of motor vehicles, motorized equipment, and any other form of modern equipment (chain saws, dozers etc.) [26]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

...Wilderness Designations limits and hinders the U.S. Forest Service from managing and protecting the ecosystem, natural resources, watersheds, etc [26]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

...Wilderness Designations have been used as an instrument by the U.S. Forest Service Agency

Officials to reduce and or prohibit historical Multiple Use Activities such as Grazing [26]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

...Wilderness Designations have proven to be detrimental to the overall economy of rural

America by diminishing revenue to our local economy, our School Districts and County Government

"Payment in Lieu of Taxes" [26]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis

of alternatives.

...unmanaged Wilderness Areas pose a threat to Human Life and Communities enabling
Catastrophic Wildland Forest Fires [26]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

...the United States Forest Service Agency has historically violated Federal laws with regard to "Minority Civil Rights" in the management of Wilderness areas and by prohibiting access [26]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

...Wilderness restrictions limit, complicate and increases the cost of livestock operations by regulating access and Holistic practices available to ranchers, in managing renewable resources, providing and maintaining water sources and fences for livestock and wildlife, watershed projects, Acequia operations and maintenance, and other resource needs...such restrictions discriminate against the handicap and elderly by not being able to visit such sites without modern equipment ... such designation will continue to diminish the fundamental economic and social natural resource dependency's and further erode the customs, culture and traditional uses of Indo-Hispano Families with historical ties to the land that have existed for over 400 years [26]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Northern New Mexico Stockmen Association: [26]

1. Opposes the designation and expansion of any additional Wilderness areas;
2. Opposes the proposed expansion of the Pecos Wilderness;
3. Urges the New Mexico congressional delegation, to oppose the proposed expansion of the existing Pecos Wilderness located in Northern New Mexico;
4. Urges the New Mexico congressional delegation, to make sure that Federal Laws and Treaties "Treaty of Guadalupe Hidalgo 1848" are enforced with regard to minority "Civil Rights" and their historic use and ties to land;
5. Urges the United States Congress not to support or pass legislation expanding the existing Pecos Wilderness located in Northern New Mexico; and further
6. BE IT RESOLVED that copies of this resolution be transmitted to the New Mexico Congressional delegation, the majority leader of the United States Senate, the speaker of the United States House of Representatives, the Honorable Susana Martinez, Governor of the State of New Mexico, the Commissioners of the effected counties of San Miguel, Mora, Taos, Rio Arriba, Santa Fe, USPS Region III Regional Forester, the Carson National Forest Supervisor, the Santa Fe National Forest Supervisor, and New Mexico Department of Agriculture Secretary. [26]

CNF Response: This comment will be carried forward and considered during the development

of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I think wilderness have been more disasterous than beneficial [19]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Wilderness are discriminatory towards the elderly (seniors) handicap + people who are in not good health + even the very young. [19]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Wilderness have complete disregard for our culture [19]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The Preliminary Wilderness Inventory Being conducted now Is not in compliance with the 1967 Southwest Regional Forest Policy written by William D. Hurst. States that these areas in the Inventory Process do not meet criteria for a Wilderness consideration Because they are not following the 1967 Policy for preserving cultural advancement of the People of Northern New Mexico to utilize these areas for there Family Livlhoods such as Logging, grazing wood & medicinal gathering Hunting, fishing. [40]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Many of the areas do not fall under the required wilderness characteristics. Additionally, several of the areas on the inventory map are listed as possible areas and are greater than 5,000 acres. A wilderness is defined under the 1964 Wilderness Act as “an area where the earth and its community of life are untrammled by man, where man himself is a visitor that does not remain.” Many of the potential wilderness areas are not “untrammled” by man. Contrary to the belief of the USFS, cattlemen have to tend to their cattle. This requires the need to enter the forest and satisfy the requirements of the allotments. Designated wilderness areas in the Carson National Forest where allotment owners graze, not only makes it near impossible to continue grazing, it also makes it very unsafe. Several of the areas listed as land with wilderness characteristics are within allotments. These areas do not meet the characteristics of wilderness. There is visible evidence of man in these allotments. Allotments not only contain cattle, they usually include earthen water holes and fences. [30]

Motorized vehicles are prohibited as an activity allowed in a wilderness. This prevents individuals with limited mobility to access parts of the forest. Expanding wilderness near adjacent private land can limit access and use of the forest by land owners. [30]

NMFLB is opposed to the current proposal by the United States Forest Service (USFS) of inventoried lands with wilderness characteristics to be classified within the Carson National Forest. [30]

CNF Response: This comment was considered during Evaluation and is addressed in the

documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

“Community involvement at Carson National Forest informational meetings has been strong. The overwhelming opinion of Rio Arriba meeting participants has been against any expansion of Wilderness designation within the forest. Residents living within and surrounding the forest intensely value it for communal multi- uses, as it’s been used for centuries. This local sentiment must be seriously considered in the context of future manageability of the forest.” [38]

Commissioner Danny Garcia [38]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The NMAA is concerned that proponents of wilderness have not provided local communities nor policymakers with a spectrum of options for protecting these lands. Our leadership has questions about the legislative process and the extent to which Congress has discretion to use other types of designations that could protect such lands from harmful industries while also recognizing historic, traditional uses of local forest-dependent communities. We have the following questions: [41]

Is there an alternative to designating wilderness areas that could accomplish the goals of prohibiting oil and gas drilling and mining? [41]

Could those same alternatives also specify a “special management area” such that historic, traditional uses could be recognized? [41]

Can local communities, including land grants and acequias, be engaged through a consultation process in defining management goals that are aligned with the principles of environmental and economic justice?[41]

To date, wilderness proponents have advocated for a wilderness designation as the only option for protecting these lands. This absolute position has not allowed room for discussion of alternatives. Until we can fully consider the above questions and explore a variety of alternatives on how to manage our public lands, the NMAA will not endorse the concept of wilderness expansion and we ask that policymakers at the local, state, and federal level do the same. [41]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

The NMCGA has longstanding policy against wilderness expansion. We realized many decades ago the wilderness designations in most areas were being proposed to diminish or preclude multiple use activities on federally managed lands, although the federal agencies are obligated to manage for multiple uses. Unfortunately, when proposals come forward to eliminate certain uses through wilderness or other restrictive designations the land based people who have historically utilized these lands are in most cases precluded from the continued undertaking of their traditional uses as a result. As such, what happens is that our rural communities are stripped of their customs and culture, their incomes decline, and the fabric of their rural communities crumbles due to the lack of economic opportunity, including their right of self-determination. [42]

CNF Response: This comment will be carried forward and considered during the development

of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The Land Grant Committee, an interim legislative body of New Mexico legislators, voted July 5th to oppose expansion of the Pecos Wilderness in both the Carson and Santa Fe National Forests. State Representative Debbie A. Rodella (D-Rio Arriba, Santa Fe and Taos- District 41), made 2 motions to oppose expansion: One opposes expansion efforts by the wilderness coalition (New Mexico Wildlife Federation, New Mexico Wilderness Society and New Mexico Wilderness Alliance). The second letter notifies officials that the committee opposes any new wilderness in the revision plan of the Carson National Forest. [43]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Healthy Watersheds are dependent on a healthy eco-system that is fire resilient. The U.S. Forest Service can play a role in supporting healthy ecosystems which at times requires active forest restoration treatments based on the best available science. The management of an area as a Wilderness or its eventual designation as a Wilderness can limit the options for treatment within those areas. This is due to the restriction on mechanized equipment within those areas. The best available science is constantly changing as we become more informed through research. Many of the areas currently designated as Wilderness throughout New Mexico are severely overgrown and are at risk for catastrophic wildfire. This is due in part to climatic change that was not factored into the original decision to designate Wilderness Areas throughout the state. In recent years several land grant communities have suffered the effects of catastrophic wildfires in their surrounding forests many of which ignited in Wilderness Areas that were densely overpopulated with trees and woody debris. In addition, to the risk of catastrophic wildfire densely overpopulated forests reduce the quantity of surface and subsurface water that downstream communities rely on for agricultural irrigation and drinking water. As well, since no mechanized equipment can be utilized to thin overgrowth or dead and down trees portions of many of the existing Wilderness areas in New Mexico are becoming increasingly less accessible to local communities for traditional use purposes. Considering all of the above mentioned factors it is recommended that the Carson National Forest strongly evaluate the ecological and socio-economic impacts that any newly identified potential Wilderness areas will have prior to making a final determination. Factors evaluated should include the potential impact a Wilderness designation would have to: [44]

- Traditional land based communities such as Native American Pueblos and Tribes and Spanish and Mexican Land Grant Communities and their ability to meaningfully access the area for traditional use purposes including fuelwood harvesting, grazing and watering of livestock, gathering of herbs, nuts and other vegetation products, and the gathering of natural resource building materials;
- The threat of catastrophic wildfire due to high tree density and fuel loads;
- The health of the watershed including the potential affect overgrowth has or will have to downstream water quantity;
- The economies of local communities dependent on forest resources.

Lastly, it is highly encouraged that for any areas identified as being recommended for a Wilderness Designation that those areas are evaluated for their overall ecological health and resilience to fire. If it is determined that those areas are in need of forest restoration to bring them more in balance with desired conditions of a healthy forest, within their respective class, then those types of restoration efforts be put in place. This should include the use mechanized equipment if necessary, prior to any Wilderness restrictions being put permanently in place. [44]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

Individual or Organization Name would like to formally express its/my desire to see lands on the Carson National Forest recommended for wilderness in the Forest Plan. [60]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Organization or individual name appreciates and is in full support of the Carson National Forests' wilderness evaluation for lands north of the existing Pecos Wilderness and for wilderness acreage within the Valle Vidal area. These lands would make excellent wilderness additions because they are wild, untrammled, and offer excellent habitat for fish and wildlife, including bighorn sheep and cutthroat trout.

Relative to the other large western states, New Mexico has exponentially fewer wilderness designated lands. Meanwhile, roads, transmission lines, cell towers, mining proposals, energy extraction, and other development continue to overtake our last remaining untouched wild landscapes. This current Carson Forest Plan revision is most likely the last opportunity to promote lands for future wilderness designation. The land, water, and wildlife have no voice. With this letter, we are speaking up and asking the Forest Service to revisit its wilderness evaluation for the aforementioned lands in the Carson Forest.

Please consider the information in this letter and recommend these lands for wilderness in the Forest Plan. [60]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The Rio Grande del Norte Coalition, including the Village of Taos Ski Valley, is in full support of the Carson National Forests' wilderness evaluation for lands north of the existing Pecos Wilderness and for wilderness acreage within the Valle Vidal area. These lands would make excellent wilderness additions because they are wild, untrammled, and offer excellent habitat for fish and wildlife, including bighorn sheep and cutthroat trout.

Relative to the other large western states, New Mexico has exponentially fewer designated Wilderness areas. Meanwhile, as roads, transmission lines, cell towers, mining proposals, energy extraction, and other development continue to overtake our last remaining untouched wild landscapes, this current Carson Forest Plan revision is most likely the last opportunity to promote lands for future wilderness designation. Designated wilderness areas that we do have in Taos County attract visitors from around the world and are an economic stimulus for Taos County as well as important watersheds for our community and habitat for our regional wildlife. [62]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The Rio Grande del Norte Coalition, including the Town of Taos, is in full support of the Carson National Forests' wilderness evaluation for lands north of the existing Pecos Wilderness and for

wilderness acreage within the Valle Vidal area. These lands would make excellent wilderness additions because they are wild, untrammled and offer excellent habitat for fish and wildlife, including bighorn sheep and cutthroat trout.

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CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Administrative protection of this important wildlife area will help ensure healthy and resilient wildlife populations for our area into the future. The Rio Grande del Norte Coalition is in full support of the Carson National Forests' wilderness evaluation for lands north of the existing Pecos Wilderness and for wilderness acreage within the Valle Vidal area. These lands would make excellent wilderness additions because they are wild, untrammled, and offer excellent habitat for fish and wildlife, including bighorn sheep and cutthroat trout.

Relative to the other large western states, New Mexico has exponentially fewer designated Wilderness areas. Meanwhile, as roads, transmission lines, cell towers, mining proposals, energy extraction, and other development continue to overtake our last remaining untouched wild landscapes, this current Carson Forest Plan revision is most likely the last opportunity to promote lands for future wilderness designation. Designated wilderness areas that we do have in Taos County attract visitors from around the world and are an economic stimulus for Taos County as well as important watersheds for our community and habitat for our regional wildlife. [64]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Process Comments

NMDA objects to the practice of “cherry-stemming” roads from the boundary of potential wilderness areas under the argument that it does not impact wilderness when, in fact, it does. If a road provides access into or bisects an area, that area is not roadless and thus not suitable for potential wilderness. The practice of artificially reducing road densities by cherry-stemming roads from an area is indefensible, regardless of the travel management road level. Many remaining inventoried polygons still include roads and trails. Though these roads and trails may not be used often by the general public, forest users such as grazing permit holders likely use them for range access for day-to-day operations. It is paramount that road and trail access and maintenance persist in polygons and not be inhibited due to the polygon’s management as wilderness. [3]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried

forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Several types of constructed features are within or near many polygons according to the Carson's online GIS database. Constructed features include structures and features such as fences, bridges, culverts, buildings, communication systems, gates, helipads, parking lots, shooting ranges, etc. Nonconstructed features may include natural barriers and other features that need to be maintained spatially. If any of these features require maintenance access, they may disqualify polygons from being recommended for wilderness designation. Additionally, many of these constructed features are "substantially noticeable" and are "permanent improvements," which under the Wilderness Act of 1964 should disqualify an area from being recommended as a wilderness area. [3]

Many of the constructed and non constructed features are related to water development and water provision for livestock and wildlife use. Under New Mexico's prior appropriation system, maintaining water rights requires a permit holder to apply water rights to the intended beneficial use. In the context of livestock watering rights, federal agencies are unable to comply with this requirement due to the fact that grazing permit holders, not the federal agency, are owners of the livestock on federal grazing allotments and are the only party capable of applying livestock watering rights to beneficial use. Therefore, NMDA requests that polygons with constructed and nonconstructed features related to livestock watering be removed from further consideration for wilderness designation. Neither wilderness recommendation nor designation should be used to allow USFS the ability to prohibit access to water or to allow the agencies to gain control of water that is necessary for the public good. [3]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The Carson's Assessment Report included classifications for watersheds within the Carson's boundaries using the watershed condition classification approach. As demonstrated in the figure below, most watershed features in the Carson are rated as having at least "moderate" risk. There are many methods to mitigate risks to watershed features such as increasing the size of openings in forest areas to encourage the persistence of snowpack or improving groundcover and stream channels. However, these activities cannot be achieved to their full capacity if an area is managed as wilderness. Thus NMDA requests the removal of all polygons with a risk rating of at least "moderate" from further consideration in the Inventory. [3]

If the ratings for Watershed Condition, Rangeland Condition, or the Fire Regime Condition are less than "Functioning Properly," restoration work is needed in those watersheds. NMDA insists that polygons that are in watersheds with a rating of less than "Functioning Properly" be removed from further evaluation in the wilderness inventory process in order to ensure that restoration projects can occur without restrictions. The importance of properly functioning watersheds should be of paramount concern for not only natural resource conditions but also for water production in the upper watershed areas within the Carson. [3]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The Carson is within the watersheds listed below.

- Upper San Juan
- Blanco Canyon

- Rio Chama
- Conejos
- Alamosa-Trinchera
- Upper Rio Grande
- Mora
- Cimarron
- Canadian Headwaters [3]

Several of these watersheds contain impaired surface waters located within polygons that are included in this evaluation. Polygons with these GIS features should be removed from further consideration in the Inventory and not be managed as wilderness to ensure access for remediation and restoration efforts can be accomplished without access or mechanized/motorized tool challenges. [3]

CNF Response: Impaired waters were identified in the Evaluation, the need for restoration on these waters will be considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

NMDA strongly opposes recommending Wildland Urban Interfaces (WUIs) for wilderness designation because doing so will negatively impact forest thinning, restoration, and other fire management strategies due to the higher access and maintenance restrictions imposed with managing areas as wilderness. [3]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

NMDA asserts that polygons with areas with ratings of moderate, high, and very high [wildfire hazard potential] be removed from further consideration due to the fact that these areas are in need of restoration work to reduce wildfire hazard potential. [3]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Numerous fires have burned in the Carson in the last 50 years. Watershed damage may still be affecting the many areas. To allow restoration work to occur in the area without the restrictions imposed by managing the area as wilderness, NMDA requests that polygons where fires have occurred be removed from further consideration in the Inventory. [3]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

NMDA requests that polygons with private land inholdings be removed from further consideration in the inventory process to ensure private land owners are able to continue their land uses without restrictions due to surrounding land being recommended for wilderness designation. NMDA also requests road maintenance access be upheld in these areas. [3]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

A few very small areas that appear to be the easements of roads, trails, or constructed features were

removed during the first Inventory phase in several polygons. These areas were removed from this phase of the Evaluation Process due to the application of the Inventory and Evaluation Criteria. NMDA is concerned that managing small areas such as these one way and managing the larger landscape in which they occupy another way is problematic. NMDA requests that the entirety of an area with substantially noticeable improvement be removed and not just the actual improvement or easement. [3]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Many polygons included in the Inventory are bordered by non-USFS land including lands owned by other federal agencies (National Park Service, Bureau of Land Management (BLM), etc.), state agencies (New Mexico State Land Office, etc.), and local governments. Further, several polygons are on the border of the Carson's administrative boundary. The management of surrounding lands that vary in ownership will likely have an adverse impact on the USFS' ability to manage inventoried areas as wilderness if bordering land owners' land use goals are different from those of USFS.... Polygons with these features should be removed from further consideration in the Inventory and not be managed as wilderness in order to secure management that is both attainable and predictable for forest users. [3]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The habitat health of all these [threatened and endangered] species is paramount to their recovery, and recommending areas for wilderness designation will inhibit restoration activities of landscapes that are vital to species health. [3]

NMDA requests that polygons where these species occur be removed from further consideration in the Inventory in order to preserve the Carson's and the Carson's partner agencies' ability to complete restoration work in the planning area. The specific areas of occurrence for all species except for those with designated critical habitat are difficult to spatially identify. However, NMDA requests that polygons where critical habitats have been designated be removed from further consideration in the Inventory in order to preserve the Carson's and the Carson's partner agencies' ability to complete restoration work in the planning area.... [3]

CNF Response: This comment would have been appropriate during Analysis, however no designated critical habitat exists in any of the areas identified as having wilderness character.

NMDA requests to remain involved in the process of noxious weed control and eradication. To that point, noxious weeds are located within or near the polygons identified in the "Inventoried Polygon Analysis" section below according to the Carson's online GIS database. Noxious weed control measures should not be inhibited due to the recommendation for wilderness designation.... Polygons with these GIS features should be removed from further consideration in the Inventory and not be managed as wilderness. [3]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

There was no indication the actual proposal areas were visited by forest personnel to actually verify the lack of roads, hunting camps, and other use areas within the proposal areas. [4]

CNF Response: Some areas were visited during evaluation specifically to assess wilderness character. In other areas the on the ground knowledge of FS district personnel was combined with information provided by the public to make the evaluation determination.

No they [wilderness characteristics] have Not been Applied, because The Land Grant are Not Federal Land There private Lands belonging to the Heirs. [6]

CNF Response: Outside of the scope of forest plan revision.

...it was noticeable that several polygons had been eliminated because they had dropped below the requisite 5,000 acres after range improvements were evaluated. This is of great concern because the evidence of grazing that is allowed in roadless areas and in wilderness should not disqualify an otherwise roadless area from being considered for wilderness recommendation. There are several methods that could be used by the permittees and the range managers to lessen the impact on the visual landscape so that these most important areas for watershed health and wildlife corridors could still provide opportunities for solitude and/or an area that is not substantially impacted by human interventions. These could include using less noticeable fencing - painting the fence posts and stock tanks to match the surrounding vegetation, and moving certain fence lines that mark boundaries of grazing areas so that they are no longer cutting through meadows and areas with less vegetative cover. This could be done over time, so that these areas could still be managed as having wilderness character, and it should not burden permittees with heavy costs, especially considering the low price permittees pay per AUM as compared to grazing costs on state and private land. When the forest service is writing a plan for the next 10-30 years, this is not too much to ask of the grazing managers and the permittees. [21]

CNF Response: The existing condition was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment may be most appropriate during the development of plan components.

Certain polygons being considered for wilderness were dropped off in the recent 2016 round of the Carson NF plan revision process because there was evidence of human intervention due to timber harvests leaving taller stumps and also to landscape restoration - thinning and controlled burning that had occurred in roadless areas. Some polygons were reduced because there were visible stumps that were old, but more than a foot high. In the distant past, when loggers took trees with chainsaws and/or crosscut saws, they would leave a visible stump between 2 and 4 feet high. Many of these stumps are quite old - 40 to 50 years, and are rotting away, albeit quite slowly in New Mexico's dry climate. These stumps should not eliminate an area from consideration for wilderness, if it meets other requirements in terms of being roadless, of having sufficient acreage, and of providing outstanding opportunities for solitude and unique and beautiful vistas. Land with taller stumps could be considered evidence of past historic and cultural uses, similar to old deteriorated mining sites, etc. If this land was protected as wilderness or recommended wilderness, in another 50 years, these stumps would probably no longer exist, and would certainly not impair the wilderness experience for human users. It certainly doesn't impair the experience of native plants and wild and endangered animals who will be the most prevalent users of these areas, and have the greatest need for untrammelled habitat. and migration corridors needed because of climate change. Also, if an area has evidence of thinning, in terms of relatively straight lines of thinned areas and/or changes in canopy cover that are visible from the air, this should not eliminate an area from wilderness consideration. The reasoning is that if the landscape is being restored to what best science says is a prehistoric condition, that should not eliminate it from wilderness consideration; in fact, that is a strong argument for including it. If the forest had been allowed to manage itself in terms of the natural fire regime and no grazing, it would most likely look like what a landscape restoration is aiming for. I am not saying that areas that were clearcut in the bad old days and then were reseeded to create a ponderosa plantation are qualified for wilderness, but neither should

some restoration and controlled burning eliminate an area from consideration. Matchstick forests are not what the scientific standard for wilderness character should be, in terms of naturalness, but intelligent, well-managed restoration should not eliminate lands from consideration. It would be useful to be proactive and not eliminate areas for wilderness consideration in the Carson NF because of practices that are aimed at restoring a historic forest and a healthy fire regime. [21]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Amigos Bravos believes that there is substantially more land in the Carson National Forest that meet the five wilderness criteria as set forth in the Wilderness Act of 1964. [21]

In general Amigos Bravos was concerned to see that many lands were dropped off the map because of past or present vegetative treatments, range improvement areas, water quality impairments, or watershed restoration projects. These landscape features or activities should not automatically disqualify an area from consideration. It is not the mere presence or absence of these activities that should be considered, but rather whether they have had a substantial impact on the area's naturalness. Lands with these types of landscape alterations or treatments can be deemed eligible for wilderness if the treatments are "substantially unnoticeable". Amigos Bravos was concerned that the evaluation process appeared to disqualify the area due to the presence of these features or treatments without analyzing whether or not they exceeded this threshold of being "substantially unnoticeable" [22]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

In the case of the potential for the CNF to establish new recommended wilderness (RW) designations through this process, it is worth noting that once congressionally designated as Wilderness and in the interim phase of managing recommended wilderness (RW), management restrictions can lead to burdensome and onerous limitations on how wildland fires are fought. We see that Wilderness designation, especially when boundaries come close to communities and/or the urban interface, could lead to wildland firefighters not having the necessary access to tackle such fires, with potentially catastrophic results to those adjacent communities. While we recognize that there are exemptions and workarounds of the Wilderness restrictions during the emergency of a wildfire, as we understand it, those still require approval of Washington office leadership and take precious time that is needed to protect adjacent communities. We believe that these inevitable time delays are not factored in well enough into the process of determining where new recommendations for Wilderness are most practical, suitable and justifiable and we recommend that the CNF take these factors more into account. [8]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Supposing that grazing is the main cause of the depletion of springs after the larger causes of wildfires and climate change, I would request that the assessment and evaluation not separate water withdrawals from range use for riparian areas from range use in spring areas. It minimizes the impact of grazing on both springs and riparian areas. [23]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

NEPA, Laws, Rules and Regulations, pronouncements in the FEDERAL REGISTER all need to be followed as per the directives of Congress and the law. [24]

CNF Response: We agree, this is required by law.

...we are concerned about how the information from the evaluation is being carried forward into the NEPA process. The current proposal to carry forward only 66,000 acres – about 10% of the final inventoried acreage (and only 6% of the entire forest) – is inadequate. It excludes areas recommended by The Wilderness Society and other members of the public during scoping and the draft wilderness inventory, appears to exclude areas based on application of considerations that are improper in the evaluation phase, and does not provide an adequate range of alternatives. [10]

CNF Response: The definition of wilderness character is as required by Chapter 70 of the planning rule directives and is based on the 1964 Wilderness Act.

Many of the wilderness evaluation narratives improperly rely on the presence of past or current human activities or improvements – such as grazing, wildlife management, past logging, past or anticipated vegetation treatments, developed recreation sites, or motorized recreation – when evaluating naturalness. The relevant inquiry, however, is not the presence of these activities or improvements, but rather their effect on the area’s naturalness in spite of their presence, as judged by the average visitor. Activities or improvements that are “substantially unnoticeable” do not undermine the area’s apparent naturalness. As the Sierra Nevada Forests (“early adopters” under the 2012 planning rule) explained in their wilderness evaluation process paper, “[a]n area does not have to be pristine or untouched to be suitable for the NWPS” and may contain vegetation treatments, timber harvests, permanently installed vertical structures, areas of historic mining, range improvement areas with minor structural improvements, minor, easily removable recreation developments, watershed treatment areas, structures, and relics of past occupation where they are considered part of the historic or cultural landscape, and level 1, decommissioned, unauthorized, or temporary roads – as long as they are substantially unnoticeable. [10]

It is important to note that improvements and activities related to grazing or motorized use were consistently cited in evaluation narratives as detracting from apparent naturalness. In fact, the Forest Service frequently mentions these two categories of improvements/activities throughout their evaluation write ups as impairing several wilderness attributes (i.e., apparent naturalness, solitude, and manageability). [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Several evaluation narratives mention past vegetation treatments as detracting from apparent naturalness, but provide no evaluation of how those past treatments appear to the average visitor and the degree to which the treatments are detracting from apparent naturalness. For example, the Cruces Basin-San Antonio Watershed narrative includes a passing statement that vegetation treatments are detracting from apparent naturalness. The evaluation did not even attempt to provide information about how many acres are covered by these treatments, exactly where these treatments are located, roughly how long ago they occurred, or what they look like on the ground. Decades-old timber harvests with occurring revegetation are often unnoticeable to the average visitor. It is not the presence of past timber harvests, but whether the area appears natural in spite of them and any other human activities or improvements that may be present. Indeed, we were unable to identify any treatments in inventory polygon areas W29 or W27 using Google Earth satellite imagery. And, we did not see any remnant impacts from past vegetation treatments that would detract from apparent naturalness in our field inventory of these two inventory units. It is our conclusion that this activity is substantially unnoticeable to the average visitor and that the Forest Service should change the evaluation narrative accordingly. [10]

The following evaluation narratives list past vegetation treatments and logging as detracting from

wilderness character without discussing the activities' appearance and the degree to which it detracts from apparent naturalness: Alamosa, Canjilon Mountain, Comanche East, Rio Chama Wilderness Accompaniments and Echo Amphitheater, Columbine Hondo, Latir Wilderness Accompaniments, Midnight Meadows and Mallette Canyon, Rio Grande del Norte Accompaniments, Valle Vidal, Cruces Basin and San Antonio Watershed, Mesa Vibora, Petaca, Rio Tusas, Embudo Creek Watershed, Luna and Coyote, Rio Grande del Rancho Watershed, and Warm Spring and Miranda Canyon. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The narrative for the Cruces Basin-San Antonio Watershed also lists the presence of irrigation ditches, impaired waters and developed recreation sites consisting of campgrounds and other facilities as detracting from wilderness character. We acknowledge that there are irrigation ditches in the area and that some of the ditches might be substantially noticeable; however, the Forest Service did not attempt to describe the appearance of this feature nor the extent to which the ditches are detracting from apparent naturalness. Further, we contend that the Forest Service could easily adjust the boundary to exclude these features from the area. Next, regarding the impaired stream in the Rio San Antonio area, water quality is not an appropriate consideration when evaluating apparent naturalness; instead, the proper inquiry is whether the water appears polluted and, if so, whether its polluted appearance would be substantially unnoticeable to the average visitor. The evaluation fails to discuss the appearance of the stream. If the stream appears natural to the average visitor, then this should not be considered in the evaluation. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

As for developed recreation sites, these are easy to exclude from the larger area by adjusting the boundary, which we request that the Carson do and then reevaluate this area. Also, it is important to note that several of these developed recreation sites are actually located immediately adjacent to the existing Cruces Basin Wilderness, and yet, the area was still capable of being designated wilderness. Further, these developed recreation sites are indeed very localized sites. It is confounding how something so small could have such an outsized impact to the entire evaluation area, which is about 120,000 acres. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

We are extremely concerned that our issues with the Cruces Basin-San Antonio Watershed evaluation area – just one limited example for which we have on-the-ground data to support our claims -- is representative of more widespread misapplication of the apparent naturalness criteria throughout the wilderness evaluation narratives. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Most of the narratives suggest that the Forest Service either improperly conflated the criterion that an area has “outstanding opportunities for solitude or a primitive and unconfined type of recreation” or failed to consider outstanding opportunities for primitive and unconfined recreation altogether. Both the plain language of the Wilderness Act and the Chapter 70 directives make clear that this is an ‘either/or’ criterion: “an area only has to possess one or the other” and “does not have to possess outstanding opportunities for both elements, nor does it need to possess outstanding opportunities on every acre.” The Chapter 70 directives require the agency to consider both solitude and primitive/unconfined recreation; the Carson cannot simply consider one or the other. Thus, the evaluation must consider both

solitude and primitive/unconfined recreation and cannot consider solitude only. The evaluation must also consider solitude and primitive/confined recreation independently of one another and cannot otherwise conflate the two. Narratives like that for the Rio Grande del Rancho Watershed, however, failed to consider opportunities for primitive and unconfined recreation altogether. [10]

The following evaluation narratives failed to consider outstanding opportunities for primitive and unconfined recreation: Alamosa, Canjilon Mountain, Comanche-East, Rio Chama Wilderness Accompaniment and Echo Amitheater, Latir Wilderness Accompaniment, Midnight Meadows and Mallette Canyon, Cruces Basin and San Antonio Watershed, Mesa Vibora, Petaca, Embudo Creek Watershed, Luna and Coyote, Rio Grande del Rancho Watershed, and Warm Springs and Miranda Canyon.... we remind the agency that an area does not need to possess outstanding opportunities on every acre. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The Carson’s evaluation methodology considered “disruptive sights and sounds from outside the area.” As we mentioned in our letter to the Carson dated April 15, 2016, sights, sounds, or activities outside an area are irrelevant unless they are so pervasive that they significantly degrade opportunities for solitude within the area.... Further, as discussed above, if outside sights and sounds are so pervasive that they significantly degrade opportunities for solitude, it is very likely the area still retains outstanding opportunities for primitive and confined recreation. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Chapter 70 lists five factors to consider when evaluating “the degree to which the area may be managed to preserve its wilderness characteristics”: (a) shape and configuration of the area; (b) legally established rights or uses within the area; (c) specific Federal or State laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics; (d) the presence and amount of non-Federal land in the area; and (e) management of adjacent lands. As these factors – which focus on the geographical shape and configuration of the area and any governing legal requirements – highlight, the evaluation is not an appropriate place to consider management trade-offs, which should be analyzed in the DEIS. [10]

Most of the narratives we reviewed, however, improperly consider management trade-offs such as whether an area may be managed for motorized recreation, for mountain biking, for hunting, for livestock grazing, for wildlife management, or for vegetation treatments.... Moreover, many of the management activities listed in the narratives – including grazing (which we discuss later), wildlife management, and restoration activities (including recently approved restoration projects) – do not constitute conflicting uses that would necessarily impede wilderness management. Indeed, activities such as ecological restoration and prescribed fires may continue if they do not interfere with preservation of wilderness characteristics. In some cases, these activities may in fact increase wilderness character. [10]

All of the evaluation narratives except for the Latir Peak Wilderness Accompaniment site contain inappropriate considerations when evaluating manageability. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

When evaluating apparent naturalness and manageability, most narratives rely on the presence of grazing and associated infrastructure – which is commonplace throughout the western national forests,

including in designated and recommended wilderness – as a disqualifying consideration. While the widespread presence of substantially noticeable grazing improvements may cumulatively impact an area’s apparent naturalness, the mere presence of range improvements does not automatically impede wilderness character, as many of the narratives seem to assume. Indeed, Congress and the Forest Service have routinely determined that areas with grazing, including range improvements and the need for motorized/mechanized access, possess wilderness characteristics and have managed them to maintain their suitability for wilderness designation. [10]

Most of the narratives focused on the mere presence of grazing improvements as undermining apparent naturalness. As described above, absent an evaluation of whether that use would appear substantially unnoticeable to the average visitor, the mere presence of motorized uses is an inappropriate consideration.... [10]

A handful of evaluation narratives (Alamosa, Comanche-east, and Rio Tusas Watershed) also consider the visual impacts from ungulate grazing when evaluating apparent naturalness. For example, the Alamosa evaluation area notes that “visual impacts from ungulate (including wildlife, domestic animals, and wild horses) grazing throughout this area have altered its natural appearance.” The narratives fail to consider whether the average visitor would notice whether the impacts from ungulate grazing is substantial, thereby degrading an area’s natural appearance. We also take issue with the fact that the Carson faults an area for lacking wilderness character if impacts from ungulate grazing, a use/activity that is completely consistent with the Wilderness Act, detract from apparent naturalness. [10]

Most of the narratives improperly considered grazing and wildlife management when evaluating an area’s manageability. As discussed above, Chapter 70 lists five factors to consider when evaluating “the degree to which the area may be managed to preserve its wilderness characteristics,” and these factors clearly demonstrate that the evaluation is not an appropriate place to consider management trade-offs, which should be analyzed in the DEIS. The need to use motorized or mechanized equipment for grazing is not listed as a consideration in the Chapter 70 directives when evaluating manageability. However, the narrative for the Cruces Basin-San Antonio Watershed narrative area notes the following: “motorized access and use of mechanized equipment for the maintenance of range and wildlife improvements, such as exclosures, spring developments, trick tanks, stock tanks, fish barriers, and corrals.” Consideration of these sorts of management trade-offs are outside the scope of the wilderness evaluation. Further, management and access associated with grazing does not constitute a conflicting use that would necessarily impede wilderness management, as we discussed in sections I (D) and (E)..... [10]

The following evaluation write ups discuss the presence of grazing improvements without evaluating the degree to which those activities or improvements appear substantially unnoticeable to the average visitor: Alamosa, Arroyo Seca Watershed, Canjilon Mountain, Rio Chama Wilderness Accompaniment and Echo Amphitheater, Columbine Hondo, Cruces Basin and San Antonio Watershed, Mesa Vibora, and Petaca. [10]

The following evaluation write ups improperly considered the need for motorized and mechanized equipment associated with grazing when evaluating manageability: Alamosa, Arroyo Seco Watershed, Canjilon Mountain, Comanche East, Rio Chama Wilderness Accompaniment, Columbine Hondo, El Rito-Labato, Valle Vidal, Cruces Basin-San Antonio Watersehhd, Mesa Vibora, and Petaca. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Most of the narratives we reviewed focus on the presence of roads and motorized uses inside the evaluated polygons. While routes may impact an area’s apparent naturalness and motorized uses may

impact opportunities for solitude, their presence does not automatically impede wilderness character, as many of the narratives seem to assume. In fact, Congress, the Forest Service, and other agencies have routinely determined that areas with authorized motorized activity possess wilderness characteristics and have managed them to maintain their suitability for wilderness designation. [10]

Some narratives consider the mere presence of closed roads or motorized trails in an area as undermining its naturalness. As described above, absent an evaluation of whether that use would appear substantially unnoticeable to the average visitor, the presence of closed roads and motorized trails is an inappropriate consideration.... [10]

The following evaluation narratives consider the mere presence of closed roads and unauthorized routes in an area when evaluating its appearance without a discussion of their appearance and the degree to which they are detracting from apparent naturalness and wilderness character: Arroyo Seca, Canjilon Mountain, Comanche East, Rio Chama Wilderness Accompaniments and Echo Amphitheater, Latir Wilderness Accompaniments, Midnight Meadows and Mallette Canyon, Rio Grande del Norte Accompaniments, Valle Vidal, Cruces Basin and San Antonio Watershed, Embudo Creek Watershed, Luna and Coyote, Rio Grande del Rancho Watershed, and Warm Springs and Miranda Canyon. [10]

Many narratives consider the presence of motorized uses in an area as undermining opportunities for solitude. For example, the Rio Grande del Rancho Watershed evaluation write up lists the types of uses that occur in the area, including snowmobiling. In this example, the evaluation fails to explain the degree to which this use is detracting from a visitor's ability to experience solitude; the presence of motorized use is not sufficient. Further, an area need not possess outstanding opportunities for solitude on every acre. Simply finding opportunities for solitude somewhere within the area is sufficient. A second example is the Cruces Basin and San Antonio Evaluation Area write up that states an area lacks solitude because of high levels of use that exist in the area, including "driving for pleasure." We presume this refers to visitors driving a car or truck along system roads, as opposed to driving an ATV/ORV for recreation because there are no designated motorized trails in the entire evaluation area. If driving for pleasure refers mainly to the former, then we take great issue with this consideration. The Carson's wilderness inventory should have excluded lands with roads that are open to public motorized use (i.e., roads displayed on the MVUM). If these lands were supposedly excluded from the wilderness inventory as required by the national directives, how could this consideration then be used to down-rate an area when evaluating opportunities for solitude in the evaluation phase? [10]

The following narratives improperly consider the presence of motorized uses, such as driving for pleasure, in an area when evaluating outstanding opportunities for solitude: Alamosa, Canjilon Mountain, Comanche East, Rio Chama Wilderness Accompaniments, Columbine Hondo, Cruces Basin and San Antonio Watershed, Petaca, Rio Tusas Watershed, Lunsu and Coyote, Rio Grande del Rancho Watershed, and Warm Springs and Miranda Canyon. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The Carson divided the evaluation into two phases. The phase 1 evaluation considered seven manageability factors; if one of the factors is present, the Carson then removed portions or all of an evaluated area from further consideration in the evaluation phase. The presence of motorized trails was one of the seven manageability considerations due to what the Carson describes as "established management." Areas containing motorized trails were split and any remaining portions less than 5,000 acres were removed from further consideration. We take issue with this approach for two reasons. First, the Carson did not even attempt to consider the presence of motorized trails in the context of the other evaluation criteria. It appears as though the presence of motorized trails trumps all other considerations, regardless of whether an area contains otherwise high levels of wilderness character when evaluating the factors detailed in Chapter 72. Second, the Carson's use of "established management" is not an

appropriate consideration. Instead, the Carson must consider “established rights or uses within the area,” which is a much different factor. Even authorized motorized uses are not “[l]egally established . . . uses within the area,” which should be interpreted to encompass uses established by law – not to agency planning or implementation decisions like designation of motorized trails in a travel management plan. The Phase 1 evaluation form lists several areas as containing motorized trails that were split into smaller areas. The Carson must eliminate motorized trails from the list of phase 1 considerations and carry forward the listed areas into the Phase 2 evaluation. Then, in Phase 2, the presence of motorized trails should be considered in the context of apparent naturalness, not manageability. [10]

In its Phase 1 evaluation, the Carson improperly removed portions of the following areas due to the presence of motorized trails: portions of Taos Canyon Area, Embudo Watershed Area, Rio Grande del Rancho Watershed Area, Columbine Hondo Wilderness Accompaniments, Midnight-Mallette Area, and Wheeler Peak Wilderness Accompaniments. [10]

In terms of the Phase 2 evaluation, several narratives consider motorized uses (presumably not the presence of motorized trails since this was covered in Phase 1) as a manageability concern. For example, the narrative for Cruces Basin-San Antonio Wilderness notes that the area would be difficult to manage to maintain its wilderness character because of the use of snowmobiles in the area during the winter and the use of ATVs for hunting access. Instead, consideration of how to balance motorized recreational opportunities with protection of wilderness characteristics is a management trade-off that should be analyzed in the DEIS. [10]

The following narratives improperly consider the presence of motorized recreational uses, including both ORV use and snowmobiling, when evaluating manageability: Columbine Hondo, Midnight Meadows and Mallette Canyon, Rio Grande del Norte Accompaniments, Valle Vidal, Cruces Basin and San Antonio Watershed, Embudo Creek Watershed, and Rio Grande del Rancho Watershed. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Based on our reading of the evaluation narratives (which are lacking important detail), it appears as though the Carson experienced situations where significant portions of an inventoried area contain wilderness character, but some small portions did not, due to issues relating to apparent naturalness and/or manageability. For example, consider a situation where most of the lands within an inventoried area poses a high degree of wilderness character but a portion contains a developed campground, historic mining, a ditch, or an old vegetation treatment that might be substantially noticeable in a localized context. The Cruces Basin-San Antonio Watershed evaluation area offers a good example with its developed campgrounds. In this situation, if the Carson determines that the noticeability of these campgrounds is substantial, then the agency should have considered adjusting the area’s boundary to exclude the development in order to restore apparent naturalness. In making this boundary adjustment, the improvement should no longer diminish apparent naturalness. The boundary adjustment should be the minimum necessary to address the issue. The Agency should document the rationale for the adjustment in the evaluation report. [10]

The following evaluation narratives mention very localized improvements that seemingly could be easily addressed by adjusting the boundary to exclude the issue: Canjilon Mountain (developed recreation sites), Columbine Hondo (developed campgrounds), Valle Vidal (campground, ring ranch), Cruces Basin and San Antonio Watershed (developed recreation sites, a ditch, and radio tower), Embudo Creek Watershed (campsites and trailheads), Rio Grande del Rancho Watershed (dump sites and sanitation clearcut), and Warm Spring and Miranda Canyon (towers). [10]

CNF Response: This comment was considered during Evaluation and is addressed in the

documentation of the Evaluation process and rationale.

...the wilderness evaluation process paper does not articulate whether or how the Forest Service weighed and compared the relative wilderness characteristics of each area to inform the determination of which areas or portions of areas to carry forward for analysis. Nowhere has the Carson addressed this issue, except to suggest that public feedback will help shape the DEIS alternatives. [10]

While we assume that the Forest Service will provide in the DEIS its rationale for which areas or portions of areas it chose to carry forward, we remain concerned that areas have been whittled down based on improper considerations related to manageability, apparent naturalness, and opportunities for solitude or unconfined/primitive recreation. For example, the wilderness evaluation narrative for the Rio Grande del Rancho Watershed improperly focuses on mountain biking and ORV recreation as impediments to the area's manageability. It is unclear whether this area is not proposed to be carried forward for NEPA analysis due to these considerations. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Since May 2015, we have repeatedly raised our concern that the approach of carrying forward for DEIS analysis only a minority of the inventoried areas will result in an unreasonably narrow range of alternatives, in violation of NEPA. The analysis of alternatives under NEPA is the "heart" of an EIS. An agency must "[r]igorously explore and objectively evaluate all reasonable alternatives" to a proposed action. Consistent with NEPA's basic policy objective to protect the environment, this includes more environmentally protective alternatives. "The existence of a viable but unexamined alternative renders an [EIS] inadequate." The "touchstone" of the inquiry is "whether an EIS's selection and discussion of alternatives fosters informed decision-making and informed public participation." [10]

The handful of areas shown on the draft evaluation map are inadequate to ensure a reasonable range of alternatives and to foster informed decision-making and public participation. The areas shown on this map would include only about 66,000 acres of potential recommended wilderness – about 10% of the final inventoried acreage. The Ninth Circuit rejected as unduly narrow a range of alternatives that would have designated a maximum of 33% of roadless acreage as recommended wilderness. The Forest Service may maintain that they are proposing to carry forward all areas that contain wilderness character; however, as we previously explained at length, we have serious disagreement with both the methods used and the conclusion that so many inventory polygons lack wilderness character. [10]

We offer three recommendations for addressing the range of alternatives. First, one alternative should include the majority of the roughly 660,000 acres of inventoried areas. This would ensure an adequate range of alternatives and a robust analysis of the trade-offs and impacts associated with recommending most of the inventoried areas. This alternative would also better facilitate additional changes to the evaluation in response to public input during this comment period and on the DEIS. It would also reduce the risk that the Forest Service will need to conduct supplemental NEPA in order to adequately respond to issues raised by the public. [10]

Second, another alternative should include all the areas that The Wilderness Society and other groups have recommended for wilderness during scoping and other relevant public participation opportunities. For example, in addition to those lands north of the Pecos Wilderness and the IRA lands directly adjacent to the Cruces Basin Wilderness, which the Carson found has wilderness character in the draft evaluation, our scoping comments recommended those lands in the northern portion of Tres Piedras Ranger District (i.e., lands associated with inventory polygons W27 and W29). The 66,000 acres that the Forest Service found to have wilderness character in the draft evaluation plus this additional 58,000 acres in the northern part of the Tres Piedras District would account for about 18% of the final

inventoried acreage. In Appendices 2 and 3, we provide detailed information documenting the wilderness character of lands within polygons W27 and W29. Under NEPA, the Forest Service is obligated to consider and analyze this reasonable proposal as an alternative. [10]

A third approach for developing an alternative is to refine the evaluation methods based on our suggested changes and then redo the evaluation. By addressing the problems raised in our letters, the Forest Service would likely find more lands as having wilderness character, which would improve the range of alternatives. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. Only those lands that have been found to possess wilderness character will be considered by DEIS alternatives, per Chapter 70 of the planning rule directives. The draft Evaluation has been refined to address public feedback and incorporate updated on-the-ground information.

Another major concern with the Carson's evaluation is its manageability considerations, which are found throughout the evaluation as justification for removing areas for wilderness protection. We are in agreement with the following statement cited in the letter submitted to the Carson by the Carson Coalition comprised of The Wilderness Society, the New Mexico Wilderness Alliance and others. [11]

“Chapter 70 lists five factors to consider when evaluating “the degree to which the area may be managed to preserve its wilderness characteristics”: (a) shape and configuration of the area; (b) legally established rights or uses within the area; (c) specific Federal or State laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics; (d) the presence and amount of non-Federal land in the area; and (e) management of adjacent lands. As these factors – which focus on the geographical shape and configuration of the area and any governing legal requirements – highlight, the evaluation is not an appropriate place to consider management trade-offs, which should be analyzed in the DEIS. [11]

Nevertheless, most of the Carson narratives reviewed improperly consider management trade-offs such as whether an area may be managed for motorized recreation, for mountain biking, for hunting, for livestock grazing, for wildlife management, or for vegetation treatments. And instead of considering an area in entirety, the Carson has excluded whole areas for the single presence of a possible unnatural use. Furthermore, many of the management activities listed in the narratives do not constitute conflicting uses that would necessarily obstruct wilderness management, and in fact some may augment or restore wilderness character. [11]

To quote further, the Forest Service is required to “[i]dentify and evaluate lands that may be suitable for inclusion in the CNF Response: NWPS] and determine whether to recommend any such lands for wilderness designation.” In evaluating potential wilderness areas, the agency must, among other things, “[e]valuate the degree to which the area may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.” And, “[s]uch features or values may include [r]are plant or animal communities or rare ecosystems,” with rare being “determined locally, regionally, nationally, or within the system of protected designations.” [11]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

An agency must “[r]igorously explore and objectively evaluate all reasonable alternatives” to a proposed action. Consistent with NEPA’s basic policy objective to protect the environment, this includes more environmentally protective alternatives. “The existence of a viable but unexamined alternative renders an [EIS] inadequate.” The “touchstone” of the inquiry is “whether an EIS’s selection and discussion of alternatives fosters informed decision-making and informed public participation.”

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

At this stage, evaluation of potential wilderness within the Carson should be a broad and inclusive process, but the handful of areas shown on the draft evaluation map are woefully narrow. They are inadequate to ensure a reasonable range of alternatives and to foster informed decision-making and public participation. The areas shown on this map would include only about 66,000 acres of potential recommended wilderness – about 10% of the final inventoried acreage. [11]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. Only those lands that have been found to possess wilderness character will be considered by DEIS alternatives, per Chapter 70 of the planning rule directives.

Because protecting ecosystem integrity and diversity is a central goal and substantive requirement of the 2012 National Forest System Land Management Planning Rule, the Forest Service must incorporate ecosystem representation information into its planning processes, including the wilderness evaluation process and consideration of designated areas pursuant to 36 C.F.R. § 219.7(c)(2)(v) & (vii). [11]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

“Apparent” is highly subjective, dependent on the observer. How about “actual” naturalness, i.e. very similar to a “natural” reference ecosystem [12]

CNF Response: The definition of wilderness character is as required by Chapter 70 of the planning rule directives and is based on the 1964 Wilderness Act.

Historic activity like railroads has changed natural characteristics forever and should cancel wilderness consideration. [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Apparent naturalness is loosely defined. How can we really evaluate land? [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Do any of the characteristics consider current special use permittees. Some have used an area for many years. these could be considered along with the other criteria in 5. [12]

CNF Response: This comment will be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Characteristic 5: When a designation area is too small, the impact to neighbor land is more significant and management should and needs to be applied on a landscape basis. [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Consideration: % of land already designated in each district. [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Should distance to population centers be considered to permit urbanites with wilderness. [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

When the USFS is considering and listening to the public, it should be mindful of the citizens who are not affiliated with associations who have larger financial resources that may have more opportunities to influence the wilderness designations. Benign dictatorship must be avoided. [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Analysis of lands with Wilderness character. This comment is also applicable to the development of plan components.

Starting with wilderness characteristics listed for each parcel would give public more to comment on. It looks like you just drew in everything over 5,000 acres without a road through it. [12]

CNF Response: Wilderness characteristics are listed for each parcel in the documentation of the Evaluation rational.

What is a “natural” condition departure? Historic condition? [13]

CNF Response: The extent to which the area appears natural to the average viewer was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. The effects of ecological departure on potential management approaches will be carried forward and considered during the Analysis of lands with Wilderness character.

Define departure from natural conditions [13]

CNF Response: The extent to which the area appears natural to the average viewer was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. The effects of ecological departure on potential management approaches will be carried forward and considered during the Analysis of lands with Wilderness character.

Define improvements. Can a campground designed by LA be included. [13]

CNF Response: This comment was considered during Inventory and Evaluation and is addressed in the documentation of the Inventory and Evaluation processes and rational.

The water adjudicated question is confusing. I think every river had already been adjudicate for the most part. Maybe the more helpful question is related to acequia infrastructure, etc. [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

These questions are subjective without quantitative measures. [13]

CNF Response: Quantitative measures are not required by the Wilderness Act or Chapter 70 of the planning rule directives. The Evaluation considerations are meant to provide a framework that clearly and efficiently describes and documents the wilderness character associated with each area.

Reseeded areas – natural? [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Characteristic 1. Is there a departure from natural conditions? Forest density will lead to catastrophic fire is not a natural condition. [15]

CNF Response: The extent to which the area appears natural to the average viewer was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. The effects of ecological departure on potential management approaches will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

Are there any high quality water resources or important watershed features? [15]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

Characteristic 4 – Eco ... historical values? [15]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

Characteristic 5: manageability Exclusion of land grant commons due to manageability and usage [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Characteristic 5: manageability Take into consideration more usage of power tools or 4-wheelers [15]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

Consider level of overgrowth, potential for catastrophic fire, or high departure from natural conditions – manageability [15]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

Any and all former common lands that were part of a community land grant should be excluded from the wilderness characteristic. These lands have been managed by the former community land grants for the benefits of the communities. they should be managed to maintain community culture and heritage of these communities. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Exclude land grant common lands from any expansion of wilderness. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

This process is unclear. Sounds like land grant lands (including on FS land) should be excluded from new wilderness areas. FS would benefit from listening to land grants. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I hope this meeting was not an exercise in futility. [15]

CNF Response: We believe that all of the wilderness meetings have been useful and productive.

Please get the input of Indian reservation. [15]

CNF Response: Each of 16 Indian Tribes with some interest in the Carson NF were notified for comment during the inventory and evaluation process. Three tribes with adjacent lands were invited to participate in our government working group, and one tribe did participate. The Carson NF met with those tribes who requested in-person meetings.

Apparent naturalness – FS should consider on the appearance to average visitor rather than the conditions as evaluated by scientific criterion [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Natural “appearing” vegetation is not necessarily the historic vegetation because of historic alteration. Evaluate naturalness on both current “appearance” and “historic” potential. [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Apparent naturalness: please focus on the appearance of ecological conditions to the average visitor [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

I am very supportive of the inclusion of departure from natural conditions as a consideration, and agree with your framing of departure in characteristic 1 and 5. [16]

CNF Response: The extent to which the area appears natural to the average viewer was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. The effects of ecological departure on potential management approaches will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

2. Shouldn't have to be both (solitude either/or unconfined rec [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Solitude might include evaluation of the view shed for alterations of the landscape. Likewise solitude evaluation should consider soundscapes – highway noise. [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Does it provide refuge from nearby human activity – does it function n a landscape level. [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Opps for solitude or unconfined recreation: evaluate opportunities for solitude separately from opps for primitive and unconfined recreation [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Several – if not all – areas are much less than 5000 acres. So you get around that by saying it is next to existing wilderness. [16]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

Size – examine contiguous lands on BLM – don't stop analysis at forest boundary but include contiguous BLM parcels that may have wilderness character. [16]

CNF Response: This comment was considered during Inventory and again during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Supplemental values: these, while important, their absence should not diminish an area for consideration as wilderness [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Historical values important information that there are more communities in Carson than any of the other NF in nation. Extra consideration needs to be made of the historic values associated with these communities. Analysis should include a community “catchment area.” [16]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

Manageability should focus on whether there are any legal requirements that might curtail wilderness management [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Supplemental values: the absence of such values should not result in an area receiving diminished consideration for wilderness [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The CNF must consider the economic benefits of traditional uses such as outfitting, grazing, timbering and firewood cutting and the impacts wilderness designation would have on those uses by restricting motorized use. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Manageability should look at proximity to existing settlements. Management is different with settlements surrounding _____ inventory unit than an area with a large “buffer zone” from settlements-built infrastructure. [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Manageability: presence of motorized or mechanized uses are irrelevant to the evaluation of manageability. [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

There is a need for the Carson NF to consider the condition of overstocked, fire-dependent forests and their impacts (current and potential) on the health of watersheds. The ability to use proactive forest management, such as thinning and prescribed burning, must be considered when considering designating wilderness. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Another consideration should be fire probability and spread into areas that have Wildland Urban Interface communities and important water sources for communities. [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Private inholdings need to be considered not suitable for wilderness consideration [16]

CNF Response: Private inholdings were removed during Inventory phase.

Please keep the wording of the original wilderness act with no interpretations. [16]

CNF Response: This wilderness recommendation process is outlined in Chapter 70 of the planning rule directives and is based on the 1964 Wilderness Act.

Start with the correct definition 'untrammelled by man' is what the 1964 act reads – why dilute this wording to suit your needs? [16]

CNF Response: The definition of wilderness character is as required by Chapter 70 of the planning rule directives and is based on the 1964 Wilderness Act.

You have made your own rules here. Your process is rigged. Your outcome is already determined. You are not fooling everyone, maybe some. [16]

CNF Response: This wilderness recommendation process is outlined in Chapter 70 of the planning rule directives and is based on the 1964 Wilderness Act.

More consideration for acequias in maintaining their headgate, also their traditions. [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Stop having permittees do stupid work – ex. Fencing off plants that kill cattle – larkspur – plants did not get the message not to pass the fence. [16]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Watershed protection continues to be a topic of discussion and the availability to harvest the product continues to be discussed. My opinion is the timber harvesting should take place in places that allow harvesting. Other areas such as those having wilderness character should go through its natural process. Whether it be fire, disease, natural disasters, Mother Nature will cleanse herself. Let the process happen naturally. No new roads. [16]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

Is there a departure from functional conditions. [16]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

invasive spp, what is natural vs unnatural [17]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

Improvements – do you mean toilets, facilities [17]

CNF Response: This comment was considered during Inventory and again during Evaluation and is addressed in the documentation of the Inventory and Evaluation processes and rational.

Departed landscape – take out these are our frequent fire forests and are highly departed so designating area wilderness areas is not advised, will prob. come out in analysis. [17]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Better definition of solitude [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Need to define or use other words to communicate what recreation opportunity spectrum ROS is. [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

need help understanding ‘solitude’ and what constitutes an opportunity for solitude. [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. Factors considered included topography, presence of screening, distance from impacts, degree of permanent intrusions, and pervasive sights and sounds from outside the area.

Characteristic 4 – considerations 2 and 6 can be combined [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Characteristic 5: fire man. consideration: It’s nice if you can let wildfires burn in wilderness, if it’s such a small area, or it’s near a resource that requires suppression, then I think it’s a problem. [17]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Fire management is very broad – do you mean ability to fight wildfire? Or Rx potential? [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Give members of the public enough time to review characteristics and considerations [17]

CNF Response: We typically request comments on our forest plan revision outputs as a suggested date to help keep moving forward in developing our revised plan. We will accept and consider comments continually until we have a completed final plan and EIS, which will be about Spring 2018.

Go through each characteristic and explain each consideration [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Simplify language [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The recreation opportunity spectrum has to be explained [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

What defines a “wild horse territories”? [17]

CNF Response: Wild Horse Territories are designated areas protected under the Wild Free-Roaming Horse and Burro Act of 1971.

...in the letter I submitted on 7/15/2016 in response to the Carson’s draft evaluation, I included a section to inform your evaluation of each inventoried area’s “supplemental values” (i.e. 72.1(4)). Specifically, ecosystem representation analysis of the National Wilderness Preservation System in relation to the areas identified in the Carson’s final wilderness inventory; the analysis tells you which inventory units contain ecosystems that are under-represented in the NWPS. The goal behind the analysis is to ultimately achieve more biological diversity in the wilderness system. [25]

Ecosystem Composition of Roadless Areas, Analysis: This table displays the level of representation and acreage for each ecosystem on the Carson and denotes how many acres would be required to elevate that ecosystem into adequate representation (i.e. above 20%). An additional column shows the minimum number of the wilderness inventory units necessary to achieve adequate protection of that ecosystem. If applicable, those inventory units that would contribute to adequate protection are highlighted. [25]

Carson National Forest Roadless Representation Table (Acreages): This table breaks each wilderness inventory unit down by the levels of representation. It allows for sorting based on percent coverage or acreage for a particular level of representation.

Additionally, the table displays the acreage and percent coverage for all underrepresented ecosystems (i.e. any under 20%) and in turn shows which units, if added to wilderness, would contribute the most acreage of underrepresented ecosystems. [25]

Note about both tables: By cross-referencing units in these tables, you can identify units that would contribute the most acreage of underrepresented ecosystems and categorize whether those same units would help to elevate a specific ecosystem into adequate representation. [25]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

We also ask that throughout the planning process that all user groups be given equal weight before rendering decisions regarding final recommendations. [18]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Analysis of lands with Wilderness character. This comment will also be appropriate during the development of plan components.

1. The Wilderness Inventory criteria is very limited (3 categories) and does allow for an adequate evaluation process of lands being considered.[26]

2. The current designed Inventory process does not allow for evaluation and inventory of renewable natural resources that benefit the indigenous people and community.
3. The Inventory process does not allow for recognition of historic uses of the subject lands and the ties of the People to land. [26]
4. The Inventory process does not allow for recognition of minority Civil Rights Laws that protect those groups that are dependent on the land Socially and Economically to remain Sustainable. [26]
5. The Inventory process criteria does not allow the necessary framework to consider adequate protection of the land and the natural resources. [26]
6. The CNFS Inventory meeting process did not allow for people to speak or ask necessary questions for clarity and understanding of process. Especially minorities! [26]

These are some of the voids that we found with the CNFS Wilderness Inventory process that would prohibit an adequate and comprehensive evaluation of CNFS lands being considered for Wilderness Designation. [26]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Hispanic and Native American ranchers and farmers within the Carson Plan Area and specifically the Livestock Grazing Program "program participants" interests need to be addressed and protected. [27]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The current CNFP revision process is required by federal law to provide assistance to "program participants" who are minorities and that have limited English proficiency, limited understanding of procedural process (technical assistance) and technological limitations. The CNF Grazing Program Participants need assistance in this complex process "understanding" and also identifying what the Cultural, Social and Economic impacts will be from the final CNFP revision process and the CNF Wilderness Inventory Evaluation process. [27]

CNF Response: Providing assistance to minority stakeholders in all Forest Service programs and activities is a responsibility that the Carson NF takes very seriously. As you point out in your letter, minority stakeholders in and around the Carson NF include Hispanic and Native American ranchers and farmers, some of whom have grazing permits on the Carson NF. It is our intention to address the needs of minority stakeholders, and to identify mutual interests during the current Carson NF Forest Plan revision process and into the future. Some of the needs for assistance that you identify in your letter are for individuals with limited English proficiency, limited understanding of procedural processes, and technical limitations that many of these stakeholders may have. Cultural, Social and Economic impacts will be considered during the Analysis of lands with Wilderness character. Cultural, Social and Economic impacts will be considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The CFNP revision process intends to meet and implement the 2012 Planning Rule Directives at the CFNP level. This brings grave concern to NNMSA and the "Grazing Program Participants" because the 2012 Planning Rule Directives were not "vetted" through an independent scientific peer review process.

CNF Response: Outside of the scope of forest plan revision.

NNMSA is requesting that the CNF provide assistance to the minority "program participants" in the CNFP revision process by contracting with an independent scientific entity such as the Linebery Policy Center/NMSU team Chaired by Dr. John Fowler. NNMSA is also "demanding" an "Independent Scientific Peer Review" of the final Carson National Forest Plan Revision and the Wilderness Inventory Designation with regard to the "Social and Economic Impacts" to minority groups "ranchers and farmers" in the plan area. Specifically for those Grazing Program Participants protected by umbrella of "Federal Civil Rights Laws" and polices pursuant to Title VI (Federally Assisted Programs), Executive Order 13166 "Improving Access to Services for persons with limited English Proficiency, "65 FR 50121-50122: and U.S Department of Justice, Policy Guidance Document", "Enforcement of Title VI of the Civil Rights Act of 1964-National Origin Discrimination Against Persons With Limited English Proficiency" (65 FR50123-50125), and "DR 4330-002, Nondiscrimination in Programs and Activities Receiving Federal Financial Assistance from USDA (March 3, 1999)". [27]

CNF Response: We are committed to adapting our communication methods to better serve and resolve any barriers that may exist. Should any NNMSA member need assistance with language barriers, with understanding the processes we are using, or have varying technological needs, we will do our best to address these needs. We recognize individuals may need further assistance in our public meetings, the documents we produce, and information we share through other means and media. Once we are made aware of any specific needs, we will make every effort possible to meet the specific need. We firmly believe forest management is all inclusive and strive to make it so. Social and Economic impacts will be considered during the effects Analysis of alternatives and will be available for review by all members of the public.

In closing Northern New Mexico Stockman's Association is very concerned about the lack of outreach by the CNF service agency during the initial phase of the wilderness inventory process. The wilderness inventory evaluation has been made a "top priority" during the first phase of the CNFP revision process by the CNF service agency. Other CNFP programs such as the "Livestock Grazing Program" should be given equal footing as well as priority status. With that said NNMSA requests that your office commission an independent peer review study of the CFN Wilderness Designation Process under taking, through Dr. John Fowler, Chairman of the Linebery Policy Center/NMSU, in Las Cruces, New Mexico. Dr. John Fowler produced "The Gila Example Wilderness Designation Report" in 2012 (RITF Report 83), the CNFP wilderness evaluation process must have such an independent study performed to protect the Cultural, Social and Economic sustainability of those minorities in the CFNP area. NNMSA has identified and requested assistance for the minority groups that will be impacted by the overall Carson National Forest revision process. The customs, culture and historic ties to the Land by Northern New Mexico Indo-Hispano Families must be recognized and protected during the CNFP process. [27]

CNF Response: The Carson NF and the Southwestern Region of the Forest Service are honored to serve the unique and diverse communities that can only be found in Northern New Mexico. As such, we are sensitive to the civil rights, needs, and the minority demographics of the area. Throughout the Carson NF Forest Plan revision process, we intend to provide the means necessary to fully engage all of the communities that have an interest in the Carson NF. The customs, culture, and historic ties to the land by Northern New Mexico communities will be recognized in the new Plan and any impacts to them will be considered during the effects Analysis of alternatives and will be available for review by all members of the public.

The 2012 Planning Rule and its Directives continue the Forest Service's long slide away from both the letter and the spirit of the Wilderness Act. The previous set of planning directives (in support of the 1982 Planning Rule Directives) had already degenerated to throw a "much wider net" over lands to identify additional "potential wilderness"... [28]

The current Planning Rule Directives (implemented Jan 31, 2015) offer even more egregiously erroneous direction on the criteria for lands with potential wilderness characteristics. The largest change is that the agency is now directed to ignore many roads that exist on the landscape when they inventory land for wilderness characteristics. The agency is directed to include level 1 roads, many “historic” roads, and even some level 2 roads: [28]

“1. Include in the inventory areas that contain the following road improvement attributes if the areas also meet the other inventory criteria (secs. 71.21 and 71.22b of this Handbook):

a. Areas that contain forest roads maintained to level 1;

f. Areas with historical wagon routes, historical mining routes, or other settlement era transportation features considered part of the historical and cultural landscape of the area.

g. Areas with maintenance level 2 roads that do not meet the criteria for exclusion in subsection 2(c) below.” [28]

This criterion is absolutely certain to run afoul of the Congressional definition of wilderness. We strongly assert that a road is clearly a “permanent improvement” and, as such, is automatically disqualified for inclusion as potential wilderness. The current planning Directives add other and additional “exceptions” that even the previous Directives did not contain: [28]

“10. Lands adjacent to development or activities that impact opportunities for solitude. The fact that nonwilderness activities or uses can be seen or heard from within any portion of the area, must not, of itself, preclude inclusion in the inventory. It is appropriate to extend boundaries to the edges of development for purposes of inclusion in the inventory. [28]

11. Structures, dwellings, and other relics of past occupation when they are considered part of the historical and cultural landscape of the area.

12. Areas with improvements that have been proposed by the Forest Service for consideration as recommended wilderness as a result of a previous Forest planning process or that the Responsible Official merits for inclusion in the inventory that were proposed for consideration through public or intergovernmental participation opportunities (sec. 70.61 of this Handbook).” [28]

Any “Structures, dwellings, and other relics of past occupation” can now be ignored and included as potential wilderness areas as long as they are “considered part of the historical and cultural landscape of the area.” “Considered” by whom? Again we stress that Congress as not delegated the definition of wilderness to the Forest Service! [28]

Read item #12 above again carefully. It allows the Responsible Official to include any improvements, without restriction, if they find “merit” for inclusion. The single paragraph “allows”, by the Forest Service’s own rulemaking, them to include any improvement in any area as potential wilderness. [28]

CNF Response: The wilderness recommendation process follows Chapter 70 of the planning rule directives and is based on the 1964 Wilderness Act. The quoted language was relevant to the Inventory phase. All the improvements mentioned which were carried through the Inventory phase have been considered during Evaluation and are addressed in the documentation of the Evaluation process and rational.

We assert that the Preliminary Inventory Criteria is far too lenient in allowing manmade structures, improvements, indeed, the whole spectrum of the “imprint of man’s work” to be included in the inventory. We declare that the Forest has mis-applied the “substantially unnoticeable” definition. The Wilderness Act uses the term “substantially unnoticeable” but only as a further definition of “natural

conditions”. The primary definition of wilderness in the Wilderness Act does not allow “permanent improvements” of any kind: [28]

“An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation...”

The “substantially unnoticeable” definition is then appended with the word “and”, not the word “or”. In simple terms, the lands must be without permanent improvements AND with the imprint of man substantially unnoticeable. By the Wilderness Act, ALL lands with permanent improvements are therefore excluded from consideration for Wilderness designation. This means all vertical structures, no matter the height, ground disturbance area, or density. It means all water developments, no matter the height, ground disturbance area, or density. All gas extraction wells (Do you really mean to include gas extraction wells in Wilderness inventory areas?), all pipelines no matter the size, all dams no matter the construction materials, and all buildings. [28]

The agency has continued to slide its own definition of what constitutes Wilderness farther and farther away from Congress’s carefully crafted definition in order to lock up more and more lands from legitimate and lawful multiple use. The Wilderness Act may not be “convenient” to the agency’s obvious desire to manufacture more wilderness-eligible lands but it is still the law. [28]

CNF Response: The wilderness recommendation process follows Chapter 70 of the planning rule directives and is based on the 1964 Wilderness Act. Not all lands in the Inventory are eligible to be recommended for wilderness designation, that determination is made during the Evaluation phase and is addressed in the documentation of the Evaluation process and rational.

We further assert that Chapter 70 of the Planning Rule Directives is illegal because it violates the Wilderness Act: [28]

“...and no Federal lands shall be designated as "wilderness areas" except as provided for in this Act or by a subsequent Act.”

Yet the Planning Directives allow the Forest Service a wide range of management options for recommended wilderness, up to, and including managing the area as if it were already designated Wilderness (emphasis added): [28]

“When developing plan components for recommended wilderness areas, the Responsible Official has discretion to implement a range of management options. All plan components applicable to a recommended area must protect and maintain the social and ecological characteristics that provide the basis for wilderness recommendation. In addition, the plan may include one or more plan components for a recommended wilderness area that:

- 1. Enhance the ecological and social characteristics that provide the basis for wilderness designations;*
- 2. Continue existing uses, only if such uses do not prevent the protection and maintenance of the social and ecological characteristics that provide the basis for wilderness designation;*
- 3. Alter existing uses, subject to valid existing rights; or*
- 4. Eliminate existing uses, except those uses subject to valid existing rights.”*

In fact, the Planning Directives instruct the Responsible Official to: [28]

“The Responsible Official should strive to maintain consistency with the provisions of 16 USC 1133(d)

and the content of FSM 1923.03(3) when developing plan components for the management of recommended wilderness areas.”

And what is contained in 16 USC 1133(d)? All of the special provisions for managing designated Wilderness. And FSM 1923.03(3) states: [28]

“Any area recommended for wilderness or wilderness study designation is not available for any use or activity that may reduce the wilderness potential of an area.”

The current 2012 Planning Rule Directives instruct the Forest Service to manage areas recommended for wilderness as if Congress has already designated those areas as Wilderness. [28]

Congress has not delegated Wilderness decision making to Forest Service. In fact, it has specifically retained that right only for itself: [28]

“...and no Federal lands shall be designated as "wilderness areas" except as provided for in this Act or by a subsequent Act.”

We assert that management of an area as Wilderness prior to it being “designated” as Wilderness is illegal and definitely not in accord with the intent of Congress. [28]

CNF Response: The wilderness recommendation process follows Chapter 70 of the planning rule directives and is based on the 1964 Wilderness Act. Changes to the 2012 planning rule or directives are outside of the scope of forest plan revision.

...we assert that providing only hard copies at the administrative office locations and an “interactive” version of the preliminary inventory maps has vastly limited the amount of public comment the agency will receive on this step of the process. The interactive map is slow (unless you have very high speed internet access) and extremely cumbersome to manipulate and use for comments. We request that all maps used in the Forest Plan revision process be made available both electronically (but not interactively!) and in hard copy form. [28]

CNF Response: The Inventory and Evaluation maps have been made available online in several formats, including a downloadable pdf. They have also been posted at each Carson NF district office. In addition, Carson planning staff held 6 public meetings to solicit feedback on the Inventory map, attended meetings of interested groups to help them provide comments, and presented the maps and information about how their constituents may comment to interested elected officials. Comments were accepted through the interactive map and also by email, regular mail, in person at any of the meetings or at any district office, or by contacting the planning team directly.

In order to be consistent with the Wilderness Act of 1964, NMDA asserts that all constructed and man-made features are indeed evidence that areas have been “trammled by man” and are “permanent improvements or human habitation” and, therefore, should all be removed during the Inventory. To that end, NMDA has identified several categories of constructed features and improvements that should be removed from further consideration in the Inventory process. [29]

CNF Response: Most of this comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Grazing Improvements and Constructed Features

USFS recognizes that “complex congressional guidelines provide for existing levels of grazing and necessary range improvements.” The continued availability of grazing allotments is important in terms

of public priorities, economic vitality of rural economies, range health, and the customs and culture of many people in New Mexico. It is paramount that your staff consult and coordinate with all affected grazing permit holders in the Carson NF throughout this process to ensure that agricultural producers retain their maximum permitted grazing Animal Unit Months (AUMs) and unrestricted access needed to maintain range improvements and manage livestock grazing on their allotments. The specific constructed features and range improvements that need to be considered and removed from further consideration in the inventory process include user roads, water developments (including earthen stock waters, tanks, windmills, pipelines, drinkers, and all other water infrastructure), corrals, fences, gates, and all other range improvements. All six of the ranger districts on the Carson NF have these constructed features and improvements. [29]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. All effected permittees have been involved in the process. NMDA hosted a meeting for effected permittees which the Carson NF planning team attended.

Further to this point, many of the constructed and nonconstructed features are related to water development and water provision for livestock and wildlife use. Under New Mexico's prior appropriation system, maintaining water rights requires a permit holder to apply water rights to the intended beneficial use. In the context of livestock watering rights, federal agencies are unable to comply with this requirement due to the fact that grazing permit holders, not the federal agency, are owners of the livestock on federal grazing allotments and are the only party capable of applying livestock watering rights to beneficial use. Therefore, NMDA requests that areas with constructed and nonconstructed features related to livestock watering be removed from further consideration for wilderness designation. The wilderness designation should not be used to allow the federal land management agencies the ability to prohibit access to water or to allow the agencies to gain control of water that is necessary for the public good and not owned by the federal government. [29]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

Roads

The "Wilderness Process Step 1: Inventory – Preliminary Inventory Criteria" document states that "open roads" will be removed from the Inventory. However, USFS identifies roads at different levels (Levels 1-5, unauthorized, and decommissioned roads). NMDA requests that all roads be removed from the Inventory due to the fact that regardless of the level of use and maintenance, the presence of roads is evidence of "permanent improvements or human habitation," which is specifically discussed in the definition of wilderness in the Wilderness Act of 1964 (see above). All six of the ranger districts on the Carson NF have roads of varying levels that should be analyzed and removed from the Inventory. [29]

CNF Response: Most level 1 (closed) roads were included at the Inventory step, as required by Chapter 70 of the planning rule directives.

Further, NMDA objects to the practice of "cherry-stemming" roads from the boundary of potential wilderness areas under the argument that it does not impact wilderness when, in fact, it does. If a road provides access into or bisects an area, that area is not roadless and thus not suitable for potential wilderness. The practice of artificially reducing road densities by cherry-stemming roads from an area is indefensible. [29]

CNF Response: This comment was considered during Evaluation and is addressed in the

documentation of the Evaluation process and rational.

Watershed Condition

“The U.S. Forest Service’s watershed condition classification, priority watershed designation, and Watershed Restoration Action Plans are the first three steps in the agency’s Watershed Condition Framework.” The Watershed Condition Classification Maps are the culmination of the first step and demonstrate the health of watersheds in the Carson NF. The Watershed Condition Classification scheme rates watersheds as “Functioning Properly,” “Functioning at Risk,” and “Impaired Function.” [29]

According to the Carson NF’s Final Assessment Report of Ecological, Social, and Economic Conditions, Trends, and Sustainability (Assessment), “In total, the [Carson NF]’s watershed and sub-watersheds are rated as: [29]

- 19% Functioning Properly
- 80% Functioning at Risk
- 1% Impaired Function

The Assessment further states, “The trend of watershed condition at the sub-watershed scale is likely to continue to be in a ‘Functioning at Risk’ category, due to the change of extent and timing of winter precipitation; risk of stand replacement fire events in forested watersheds; and increased risk from projected increase of daily average temperatures” (page 192). [29]

If the ratings for Watershed Condition are less than “Functioning Properly,” restoration work is needed in those watersheds. NMDA asserts that areas that are in watersheds with a rating of less than “Functioning Properly” should be removed from the list of recommendations for wilderness designation in order to ensure that restoration projects can occur without restrictions. The importance of properly functioning watersheds should be of paramount concern not only for natural resource conditions but also for water production in the upper watershed areas within the forest. [29]

More specifically, several New Mexico soil and water conservation districts and their partners have applied for grant and federal funding opportunities to complete important restoration work in many of New Mexico’s national forests. It is imperative these projects are not hindered or delayed by the recommendation of wilderness areas. It will take a diversity of methods – including mechanized and mechanical methods – to treat and restore our state’s watersheds. Areas that have current and pending restoration projects should be removed from further consideration in the Inventory process in order to ensure the success of restoration activities, which are critical to public welfare.[29]

CNF Response: Signed NEPA decisions where the restoration work will affect wilderness character were considered during Evaluation and are addressed in the documentation of the Evaluation process and rational. The comment regarding the need for future restoration will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Wildland Urban Interfaces

Designated Wildland Urban Interfaces (WUI) are within all six of the ranger districts in the Carson NF. It is worth noting that the Jicarilla Ranger District in particular is almost entirely within a WUI. NMDA strongly opposes recommending these areas for wilderness designation because of its impact to forest thinning and other fire management strategies. New Mexico has been experiencing record drought and subsequent fires in the past several years. Inhibiting timber management in WUIs is directly in opposition to the USFS’s three-part strategy to manage wild fires, which includes ecosystem

restoration, community preparedness, and wildfire response. Therefore, it is critical for USFS to take into account all resource conditions during this process as well as the reality of past management, current conditions, and elements of future potential conditions such as persistent drought, wildfire hazard, and other related land management challenges. [29]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Private Land Inholdings

Private land inholdings are located within all six of the ranger districts in the Carson NF. NMDA requests that areas with private inholdings be excluded from the Inventory to ensure that private land owners are able to continue their land uses without restrictions due to surrounding land being recommended for wilderness designation. NMDA also requests that road maintenance be upheld in these areas. It is the stated policy of USFS to “grant reasonable and appropriate access across National Forest System land to private inholdings and to mining claims (36 CFR 212 and 36 CFR 251, Subpart D)” consistent with the policy found in the Road and Trails Rights-Of-Way Grants in the Region 3 Forest Service Manual. In addition, wilderness designations should not be used to limit access of private landowners to their land and livelihood, particularly given concern for rural economic health in New Mexico. [29]

CNF Response: Private land was removed from further consideration during the Inventory step. This comment may also be appropriate during the development of plan components.

Invasive Species

“Invasive species have been cited as the second largest threat to endangered native species. Most noxious species in New Mexico are found on rangelands and wild lands.” Further, “Whenever the [NMDA] director becomes aware of the presence of noxious weeds on public land, he shall inform the governmental entity of the species found on land under the entity’s jurisdiction. When possible and practicable, the director shall consult with the governmental entity in developing a management plan for the control of the noxious weeds.” NMDA requests to remain involved in the process of noxious weed control and eradication. [29]

To that point, noxious weeds are located in all six of the ranger districts in the Carson NF. Managing areas as wilderness hinders the ability for forest managers and stakeholders to use mechanized restoration tools and methods when removing invasive species from the landscape. Therefore, where invasive species exist on landscapes in the Carson NF, NMDA requests those areas be removed from the Inventory process. [29]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

Other Considerations

Recently the Northern New Mexico Stockmen Association unanimously passed a resolution opposing “the designation and expansion of any additional wilderness areas...” (Passed January 9, 2016). This resolution reflects many of the perspectives of grazing permittees in the Carson NF and should be seriously considered during the Inventory process. NMDA is hopeful that we and other organizations can help facilitate the sharing of information and viewpoints between community stakeholders and the

Carson NF. [29]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Why is it the CNF during the drought years of the past sent letters to the majority or all of the grazing permit holders in the various allotments to consider reducing herd numbers, selling cattle and/or finding alternate pasture in the event the FS elected to reduce the clock on the grazing season or reduce permitted numbers. Why couldn't the same process have been followed to inform permit holders about the wilderness inventory process the CNF is now undertaking? Is the FS hiding this feat from rural folks for fear conflict may result, or is it the mission of the FS not to want rural folks to know there actions with the ongoing wilderness inventory process and the potential consequences this may have on rural folks way of life! Is it too the intent of the FS to usurp and destroy our way of life? Wilderness to rural communities is nothing more than a land and water grab. These are some of the many reasons rural folks do not trust the actions of the FS, and government in general. [20]

Rural folks do not want more wilderness because it removes their dependency and enjoyment of the land on which many of their their livelihoods depend on. We see wilderness as "cultural genocide".

Wilderness is a mechanism by which we see the FS or government totally abandons management of the land and management they do not have to budget for. Makes management of the land easier for the FS and eliminates accountability and dispels claims of mismanagement. [20]

Wilderness destroys a way of life for rural folks and what socio-economic benefit does wilderness provide to rural communities. There is no economic benefit of any kind, very few folks enjoy wilderness areas because no vehicular travel is allowed, the aesthetics are eventually destroyed by wildfires. Creation of wilderness areas without local input are subjective in nature only. Wilderness destroys the culture, custom and traditional uses of the land by rural folks and communities. [20]

Wilderness designations in time have shown livestock grazing to be eliminated. The Gila Wilderness in a paper authored by Dr. John Fowler, NMSU-Linebery Foundation shows where livestock grazing has been totally wiped out. [20]

The Travel Management Rule when implemented was described and predicated by the FS to rural communities as a management tool to close roads no longer needed for management of the landscape. Now more than ever it is very evident this was totally a false pretense but a prelude to creating wilderness areas in the future. This is another example of the misguided truths by the FS to sell their malicious agenda and intents to the general public. [20]

The audience in Abiquiu was comprised mainly of rural folks and ranchers and the overwhelming consensus was no wilderness for the reasons stated above. No one present was for wilderness and everybody present was against wilderness when polled on both situations and that is why meetings in the rural communities must be held, and not in in the populus areas where the FS know they can get favorable support to push and assert their agenda because these other urban folks have little to nothing to gain or lose by supporting wilderness designations. [20]

CNF Response: At the request of the NNMSA the Carson NF mailed letters to all permittees at the start of the evaluation process. All permittees whose allotments were in areas that were identified to have wilderness character were individually notified by mail by NMDA (NMDA is a cooperating agency on the forest plan revision process) which held a meeting and provided maps to collect permittee comments. The Forest Service attended. This comment will be carried forward and considered during the Development of alternatives (including a proposed

Wilderness Recommendation) and/or the effects analysis of alternatives.

NMFLB respectfully requests that you consider traditional uses such as grazing and wood harvesting and the important role they play in the forests. We also request and recommend that grazing allotments inventoried as lands with wilderness characteristics be removed from further consideration in the inventory and should not be managed as wilderness. [30]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

In order for Rio Arriba County and other interested participants to accurately comprehend the attributes of the acreage being evaluated, it would be most helpful to have an assessment of the physical, cultural and aesthetic characteristics applying the following suggested criteria. At a minimum, we believe that the assessment grid interval should be no greater than 2,000 acres and ideally 1,000 acres or less. [31]

[Slivers of land less than one acre, mostly resulting from mapping inconsistencies were removed from consideration during Evaluation. Otherwise any land over 1 acre was considered independently during Inventory and Evaluation.

Physical Characteristics

The data necessary to evaluate acreage within the Carson National Forest for most, if not all of the following physical characteristics is readily available. [31]

- 1) Topography including percentage of terrain exceeding 30% slopes.
- 2) Soils including percentage of terrain containing thin, fragile soils and rock outcrops.
- 3) Vegetation, including percentage of terrain above tree line; history of timber harvesting and wildfire; rare & endangered flora; pasture and grasslands.
- 4) Mapped oil/gas reserves and existing leases.
- 5) Water features, headwaters, wetlands, mapped aquifer and/or groundwater recharge areas.
- 6) Wildlife habitat and migratory corridors.
- 7) Estimated effects of climate change to the physical characteristics over time.
- 8) Proximity to existing designated Wilderness.
- 9) Risk of uncontrollable wildfire and the potential impacts to adjacent land uses (low to high).
- 10) Annual precipitation, including average duration of snowpack.

Cultural Characteristics [31]

- 1) Proximity to and/or percentage within original Land Grants.
- 2) Proximity to and/or percentage within active grazing leases (within past 25 years).
- 3) Proximity to existing roads/trails and/or miles of roads/trails within the assessment grid.
- 4) Proximity to historical settlements, burial and ceremonial sites.

5) Proximity to existing recreation/tourism infrastructure including trailheads, campgrounds, lodging, food and mercantile.

6) Imminent cultural pressures on the land that could rapidly change its wilderness characteristics.

Within this category of criteria, we believe that USFS could be greatly assisted by local citizens with identification of significant features and considerations that should be taken into account during the evaluation phase. We urge USFS to hold a series of community meetings, involving interactive design charrettes using the Preliminary Inventory Maps. [31]

Aesthetic Characteristics [31]

In order to successfully evaluate the Wilderness Act thresholds for outstanding opportunities for solitude; opportunities for primitive recreation; and where the earth and its community of life are untrammelled by man, the following additional criteria should also be considered. · The first two criteria highlight favorable characteristics while the remaining three may be considered negative attributes. [31]

1) Unique views and vistas within assessment grid and/or as seen from grid.

2) Unique physical features within assessment grid and/or as uniquely seen from grid.

3) Road/highway noise and lights detectable within assessment grid.

4) Proximity to aviation flight paths (i.e., low altitude VFR/IFR victor airways), commonly used commercial routes where aircraft descents and ascents occur, military training areas.

5) Cellular telephone reception within the assessment grid.

The preceding is not intended to be an all-inclusive list of criteria, but rather a supplemental example of criteria that we would like to see applied in your evaluation process. We haven't yet seen your criteria and methods and would certainly welcome the opportunity to do so before yow work is complete. [31]

CNF Response: Much of this information is publically available. Some was summarized by the Carson NF's Assessment. Those features that affect wilderness character as defined in Chapter 70 of the planning rule directives were considered during Evaluation and are addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Questa Ranger District

Q5 / Q1 / Q4 Forest management is needed in each of these areas to insure forest health. In 2002 a catastrophic fire occurred. This same event could occur again as forest health deteriorates. Though fire is allowed in a wilderness, the impact on neighbors is potentially significant. The smaller an area is the more likely the impact on neighbor lands will occur. [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Q5 / Q4 / Q1 No mechanical access would eliminate critical management options in forests, range, weeds, waterways [12]

CNF Response: This comment will be carried forward and considered during the development

of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Q5 / Q4 / Q1 Relatively high density of administrative access roads required for successful execution of several special use permits. [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Q5 / Q4 / Q1 Widespread noxious weed infestations [12]

CNF Response: This comment will be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Q1 / Q4 evidence of human activity – roads, old railroad beds, logged areas, etc. [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Q1 / Q4 Lots of range improvements, i.e. windmills and earthen water tanks that need to be maintained with mechanical equipment [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

All motorized trails around Red River must stay as is. If these go wilderness, it will seriously impact RR economically. [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

A possible trail along the big Ditch needs to stay open for that consideration [16]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

For Red river town and corridor Hwy 434 need a big buffer (not 1 mile, more like 10 miles) [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I don't want to see the areas near San Cristóbal, Kiowa Village, La Larra (Lama?) as wilderness b/c so highly departed and inhabited. [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

In Red River area, there should not be any more land made into wilderness. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Red River area and Valle Vidal do not need any more wilderness areas. This will have an impact on \$ made in Red River. The town will die out. More than ½ the \$ made is from jeeps, ATV and motorcycles. There will be fire dangers to other communities if any more area is made wilderness in these two areas also. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The Columbine Hondo W. boundary adjustment was to allow for a connector trail for all uses (except motorized) between TSV and Red River and utilizing the Big Ditch. [16]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

I am expressing information about units Q-1, Q-4 and Q-5. [35]

Concerns:

In each of these areas civilization has had an impact on the landscape for more than 100 years. As a result restoration activities are needed. [35]

1. stream modification by roads, railroads, and activities - significant erosion. Projects in a few areas show improvements.
2. Ponil Complex Fire affected units Q1, Q4 and Q5. Some restoration projects have taken place. Work needs to mitigate the adverse effect to the watershed.
3. Forest Health. A large area of Q 5 is in need of restoration cuts to improve the health of the forest. Some forest treatment has been accomplished in the past but a management plan that focuses on forest health would reduce the fire risk.
4. Service Roads that are closed to the public but are used by permit holders are need to allow activities to take place and management activities to be performed related to fencing, roads, water, program activities, conservation projects.
5. The Cimarron Watershed Alliance has submitted CFRP grant application for a large area of Q 5. NEPA and inventory work would be done through the grant. The CWA is committed to supporting the Forest Service in preparing the way to improve the forest health.
6. Philmont Scout Ranch is a significant user of Q1, Q4, and Q5. This organization is concerned about the health of these three units. We advocate a well planned forest management plan for these areas.
7. Philmont Scout Ranch has nearly 10,000 user days of youth participants from all over the country on the three units. Being able to see strong management in action by the USFS is a very important experience for these young people. When they can also be engaged in the work on the land we have allowed these young people to connect with public land and to be able to reach out in other areas across the country in their home states. [35]

CNF Response: This comment was considered during Evaluation and is addressed in the

documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Latir Accompaniments Evaluation Area

Inventoried Area LpW1

This area, above the community of El Rito, has wilderness characteristics and outstanding scenic and natural values. It would make a good addition to the Latir Wilderness. It meets the criteria because it is adjacent to existing wilderness. [35]

This was originally excluded from the Latir Wilderness in the 1980 NM Wilderness Act, because there is an old dirt road/route running N-S from Rito Primero to Jaracito Canyon. The road is seldom used, as access is very rocky and steep. [35]

There is a history of illegal motorized use in the wilderness in both Rito Primero and Rito Del Medio canyons, and there is a FS that was once locked to prevent motorized use, but it left open. The New Mexico Wilderness Alliance did a service project about 10 years ago, to curb motorized use, at the end of the Rito Primero cherry stem. [35]

The neighboring community of El Rito appreciates wilderness values, and would probably be in favor of the addition of this area to the Latir Wilderness. [35]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Inventoried Area LpW2

This area, below Pinabete Peak, has unique wilderness character and opportunities for solitude. Even though it is less than 5,000 acres, it meets the criteria, because it is adjacent to an existing wilderness. It is a viable addition to the Latir Wilderness. [33]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

We think that even though this is less than 5,000 acres, it meets the criteria because it is adjacent to an existing Wilderness Area. This should be an addition to the Latir Wilderness. [44]

CNF Response: This area was determined not to have wilderness character.

Midnight-Mallette Evaluation Area

Inventoried Area Q1

(VV West) This area, in the southwest corner of the Valle Vidal Unit, also meets the size requirements for inclusion in the wilderness inventory. It has outstanding natural beauty, opportunities for solitude and wildlife viewing. This area contains the Valle Vidal itself, one of the largest alpine grassland ecologies in the state of New Mexico. This area is critical calving area for components of the largest herds of elk in the state of New Mexico. [33]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

(VV Rock Wall) This area meets the criteria, has unique wilderness characteristics, outstanding natural beauty and scenic values. It contains a significant section of the “Rock Wall”, one of the outstanding geologic features of the Valle Vidal. The area east of the Rock Wall is steep slope, with abundant wildlife, outstanding views of Beatty Lakes and the East Half of the Valle Vidal. [33]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Inventoried Area Q3

This area, on the north side of the Red River Canyon, has opportunities for solitude and wilderness character. It meets the criteria because of its size (9,544 acres). This area is critical habitat for the transplanted herd of Rocky Mountain Bighorn Sheep. It surrounds the Molybdenum mine, would be a good way to protect the surrounding Public Lands. It would be a good addition to the National Wilderness Preservation System. [33]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

has a unique ATV, OTV trail that is easily accessible and a place to view molybdenum mine areas. This is an educational trail and should remain open to the public. [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

roads and trails for motorized use, i.e. motorcycle loop trail [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The size of this area and its wilderness character meet the criteria for wilderness designation. [44]

CNF Response: This area was determined not to have wilderness character.

Inventoried Area Q5

(VV Southeast) This area contains the Beatty Lakes and Seally Canyon, and is a frequented area by the Boy Scouts of America and is adjacent to Philmont Scout Ranch. The BSA uses this area for overflow from Philmont, and does quite a bit of backpacking with larger Scout Groups, so making it wilderness might impair their ability to offer outdoor experiences. There are 4WD roads to the lakes, that some people use, and making it wilderness would restrict their use. The Valle Vidal is a Multiple Use Area, and some areas should be left open to vehicle use (on designated routes). [33]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

As a snowmobile enthusiast, I know that the Midnight area and the Greenie Peak are used by various snowmobile groups. Children and adults can get an educational experience and an awesome recreational experience. This should not be designated as a wilderness area. keep this one open for hiking, ATV use, horseback and snowmobile use! (areas in ___ are: Anderson Park, Anchor Mine – don’t include as wilderness areas) [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Q5 has private land in LaBelle area – snowmobiling occurs here in winter. [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

mechanical equipment needed for range improvement maintenance [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Midnight-Mallette area has lots of motorized use – ATVs and snowmobile [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Also less than 5,000 acres, because it is adjacent to existing Wilderness, this, too, would make an excellent addition to the Latir Wilderness. [44]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

This area contains the Valle Vidal itself, one of the largest alpine grasslands in the state of New Mexico and is a critical elk calving area. The area is not broken out of Q5 on the Preliminary Inventory maps so precise acreage is not available. [44]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

Evaluated Polygon Q5n

Fence line road along boundary with private. What do locals want? Does not meet criteria drop from consideration. [4]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

This area, north of FR 134, in Cabresto Canyon, is a special place, with great opportunities for solitude and unique wilderness character. Even though it is less than 5,000 acres, it meets the criteria because it is adjacent to existing wilderness. This area would make a great addition to the Latir Wilderness. [33]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

- 1) NMDA Recommendation: Remove from further consideration. Below is a list of features and concerns that should exclude this polygon from further consideration in the Evaluation Phase. The reasons for excluding polygons with these specific features are found in the “Issues of Concern” section above. [3]
- 2) Evaluation Criteria Definition Matrix
 - a) Criteria 1: Apparent Naturalness
 - i) Wildfire Hazard Potential

- (1) Most of this polygon has a rating of “high” and some areas have a rating of “moderate.”
- ii) Invasive Species
 - (1) There are 13 acres of areas with invasive species within and directly adjacent to this polygon (adjacent infestations should be treated the same as those that are within the polygon due to the margin of error in the accuracy of the GIS location of the infestations and the potential for invasive species to spread into the polygon).
 - (a) Bull thistle (*Cirsium vulgare*) – 12.938 Total Acres – Class C
 - (i) USFS Site ID 030207_CIVU_387: 0.077 acres
 - (ii) USFS Site ID 030207_CIVU_232: 10.594 acres
 - (iii) USFS Site ID 030207_CIVU_108: 0.449 acres
 - (iv) USFS Site ID 030207_CIVU_107: 0.449 acres
 - (v) USFS Site ID 030207_CIVU_106: 0.449 acres
 - (vi) USFS Site ID 030207_CIVU_383: 0.449 acres
 - (vii) USFS Site ID 030207_CIVU_105: 0.471 acres
 - (b) Yellow toadflax (aka butter and eggs) (*Linaria vulgaris*) – 0.056 Total Acres – Class A
 - (i) USFS Site ID IN7707 MID 000: 0.056 acres
- iii) Constructed Features
 - (1) All the constructed features listed under Criteria 5 (related to constructed features for grazing allotments) detract from apparent naturalness and should be considered under Criteria 1, as well.
- b) Criteria 2: Opportunities for Solitude or Unconfined Recreation
 - i) A road is less than 1/10 of a mile from the southern boundary of this polygon (Route No. 134). Even though it is outside the boundary of the polygon, this road will likely negatively impact a visitor’s opportunity for solitude.
- c) Criteria 4: Unique and Outstanding Qualities
 - i) The Rito Claro intermittent stream is within this polygon.
- d) Criteria 5: Wilderness Characteristics Manageability
 - i) Grazing
 - (1) Allotments
 - (a) This polygon is mostly within the Lakefork Baldy grazing unit, which is utilized by two permittees. The polygon also contains portions of the Midnight/Mallete grazing unit.
 - (2) Constructed Range Features
 - (a) Fences
 - (i) Allotment fences run along the northern and southern portions of this polygon, which must be regularly maintained by grazing permittees.
 - ii) Roads and Trails
 - (1) One long trail, the Midnight Trail (Trail No. 81), is in the northern portion of this polygon.
 - iii) Fire History
 - (1) An unnamed debris burning-caused fire burned between 0.26 – 9.9 acres within this polygon in 1971.
 - iv) Management of Surrounding Lands
 - (1) This polygon’s northern boundary is bordered by the Sangre De Cristo Land Grant. [3]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Rio Grande del Norte Accompaniments Evaluation Area

Inventoried Area Qxs162ADD

Roads needed to access traditional uses and maintain range improvements [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The San Cristobal/Garrapata section is contiguous to a developed recreation area: Horsethief Mesa, and is probable for additional access/trailhead. [16]

CNF Response: This comment would have been appropriate during Analysis, however, this area was determined not to have wilderness character.

I suspect this polygon if it included adjacent BLM managed public land would exceed 5000 roadless acres and may have wilderness character. It and adjacent BLM roadless should be included in analysis. [35]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Wheeler Peak-Columbine Hondo Accompaniments Evaluation Area

Inventory Area Q2

roads abundantly used for traditional uses such as firewood removal, piñon picking, etc. [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Inventory Area WpW5

motorized access to rangeland and improvements, ATV use [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

A great place to take ATVs, ORVs or take a hike. This one should not be designated as a wilderness. It can be managed by the FS and should not be a 'problem area.' [13]

CNF Response: This comment would have been appropriate during Analysis, however, this area was determined not to have wilderness character.

heavy recreational use (ATVs) – roads needed to access traditional uses [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Inventory Area WpW6

This area, just east of Middle Fork Lake, has outstanding natural beauty, opportunities for solitude, and unique wilderness characteristics. Even though it is less than 5,000 acres, it meets the criteria, because it is adjacent to existing wilderness. This area would make a viable addition to the Wheeler Peak

Wilderness. [33]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

WpW6 Lacks solitude due to heavy hiker traffic [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The Questa district lacks areas to create hut hopping opportunities for non-motorized recreational activities (hikers, cross-country skiers, horseback riders). By leaving this area not designated as wilderness we have the opportunity to construct huts in this area – thereby creating hut-hopping between Red River and TSV. [12]

CNF Response: This comment would have been appropriate during Analysis, however, this area was determined not to have wilderness character.

Though less than 5,000 acres, it also meets the criteria because it is adjacent to existing wilderness and would make an appropriate addition to the Wheeler Peak Wilderness. [44]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Inventory Area WpW8

Lacks solitude dues to proximity of homes, ranches, highly populated trails. [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Inventory Area ChW6

This area what locals call the “lobster claw”. The Congressional Wilderness Boundary, as per the Columbine Hondo Wilderness Act of 2014, was carefully negotiated between the Town of Red River, the Carson National Forest, members of the local community, and our Congressional Delegation, from 2011 to 2014. The Town of Red River had concerns about the boundary coming too close to NM 38 and NM 576, and the Carson had concerns about fire management. All of these concerns were addressed and met with the current Congressional Wilderness Boundary. There is a lot of motorized and mechanized use in this area. With that said, there is a viable wilderness addition, south of the mining district to to Gold Hill. [33]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Departure from natural conditions – needs thinning [12]

CNF Response: This comment would have been appropriate during Analysis, however, this area was determined not to have wilderness character.

Human activity evidence in form of roads and 4x4 traffic [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Too close to town and ski area for solitude [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

We think this area is a reasonable addition to the Columbine Hondo Wilderness as it adjacent to that Wilderness. [44]

CNF Response: This comment would have been appropriate during Analysis, however, this area was determined not to have wilderness character.

Valle Vidal Evaluation Area

The Colfax County Commission opposes wilderness designation for a portion of the Valle Vidal for the following reasons: [45]

1. The federal Wilderness Act of 1964 prohibits the use of "motor vehicles" and any "other form of mechanical transport" as well as prohibiting "any structure or installation within any such area". Such restrictions prevent or significantly complicate and increase the cost of watershed restoration, flood control and watershed management.
2. Wilderness designation would also place restrictions and prohibitions and prevent proper forest management by precluding forest thinning and active fire suppression.
3. Wilderness designation will place restrictions and prevent proper cattle management by severely limiting the methods available to permittees for maintaining fencing and water infrastructure.
4. Wilderness designation would also limit access by law enforcement as well as search and rescue because access is only allowed on foot or by horseback.
5. Wilderness designation discriminates against the elderly and physically handicapped by making access to wilderness designated lands inaccessible.

The Colfax County Commission respectfully requests that you consider these traditional uses and the important role they play in maintaining a healthy forest. We respectfully request you do not designate any portion of the Valle Vidal as a wilderness area. [45]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

...the elimination of other areas in Valle Vidal (and elsewhere) because of outside sights and sounds is contrary to established legal precedent and should not be part of this evaluation process. We are fortunate that many Wilderness areas are close to or within easy driving distance of America's largest cities, and several are adjacent to large urban centers. For example, the Sandia Mountain Wilderness towers above the nearby sprawl of Albuquerque. [11]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Another area with which we are familiar and about which we have concerns regarding your decisions on wilderness character is the Valle Vidal. We are pleased that you decided Q4g qualifies. What strikes us about your analysis of wilderness character in the rest of the Valle Vidal is your reasoning that seems to be "if the status quo is maintained, then these areas do not have wilderness character." For instance,

you note that the 1986 Carson Forest Plan designated the southern part of the West-side for snowmobiling, so there is a lot of this going on, thus wilderness character is compromised. Another example is your statement (twice) that Philmont has permitted camps the activities in support of which eliminate that area from wilderness character. Since this is a planning process, might it not be worth considering alternatives to these earlier decisions, and how they might result in improvement of wilderness character? What frustrates us is that all the analysis seems on the side of what reduces wilderness character rather than what might improve it. This is not a balanced approach. [11]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. The Evaluation is of existing wilderness character, not of a desired condition. This comment may be most appropriate during the development of plan components.

The entire Valle Vidal is not eligible for a wilderness designation because of improvements: e.g. Shuree Lodge, Shuree ponds, corral for cattlemen, two lane road from Amalia to Cimarron, evidence of human activity, cemeteries. Also important watershed for the communities of Amalia, Cochilla and Garcia. [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The VV is used by many visitors, not a place for solitude. Future lands for the VV should be pave road from Amalia to Cimarron. [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment may also be appropriate during the development of plan components.

VV is adjacent to RCCLA 88,000 acres of private park managed by RCCLA [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Is an important watershed for Amalia, Costilla and Garcia [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Need to have fire management such as that used by FS, would not do to designate a wilderness area. [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The management of this communities __ is agricultural other than recreation communities. [12]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

The VV has several cemeteries where there was human activity, towns where settlers first to the VV [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

VV is surrounded by non-federal land, RCCLA, Red River and Cimarron. [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Management issue related to dead wood requiring removal. See Polygon Q5 Sections 33, 34, 28, 27. Potential for forest fire conflagration and past fire erosion damaging watershed. We are irrigators and need a healthy watershed. Also, folks here need firewood. Open the old logging roads, reduce fuel load. [12]

CNF Response: None of these specific areas were determined to have wilderness character. The general comment will be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

We need the Valle Vidal to be the engine of our local economy. Improve access and increase visitors. More visitors would help economy of Amalia, Costilla and Cimarron. Fly fishing shops and other retailers, including restaurants and lodging. [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Wilderness status conflicts with Rio Grande cut throat trout management and creed restoration. No equipment or vehicles can get in. [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The Valle Vidal should not become wilderness. It should be for the people. [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

There is an overabundance of wildlife in the Valle Vidal, elk in particular. The FS is in a better position (management) to deal with these issues than would a wilderness area! [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

There is lots of traffic already going to and from Valle Vidal on this road. [12]

CNF Response: This comment was considered during Evaluation and is addressed in the

documentation of the Evaluation process and rationale.

Adjacent private land/inholdings: Mchrystal Creek/Meadows, Lookout Canyon, LaBelle inholding [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Because of fire potential if wilderness area this could affect the Rio Costilla Cooperative Livestock Association properties, 88,000 acres of mtn producing timber. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

If considering wilderness designation for Valle Vidal, CNF should consider current riparian restoration projects currently underway on neighboring private land. Specifically: Middle Ponil Creek [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Specifically in the Valle Vidal USFS land for trade: Upper Leandro Creek, Upper Allen Creek, Upper Powderhouse Canyon [16]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

Valle Vidal should not be moved to wilderness as the need to fight wildfire would be substantially impeded. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

to my knowledge there have never been trick tanks in the Valle Vidal [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Will old roads be plugged? Some old roads are creating gullies. I have several pictures of old roads in this area that I can provide if needed; most are in this condition. [46]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Will forest thinning continue in this area? Will controlled burns continue? This is a stand north west of the entrance to the Loop Road. [46]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Inventoried Polygon Q1

Absolutely the most heavily vehicle accessed site in the Valle Vidal is Shuree Ponds [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Need access for hunting activities! (Q1/Q4) [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Inventoried Polygon Q3

Scarred by human activity – roads [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Lacks solitude – heavily used by OHV and snowmobile and important to Red River's economy [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Stay for wood cutting, piñon picking, hunting, grazing, fishing, our watersheds, head gates. [12]

CNF Response: This comment would have been appropriate during Analysis, however, this area was determined not to have wilderness character.

Inventoried Polygon Q5

I think it should be left out because of Cabresto Lake, which is a source of water for the acequia, and the village of Questa. [12]

CNF Response: This comment would have been appropriate during Analysis, however, this area was determined not to have wilderness character.

Is our main water source for irrigating. Caberesto Lake dam must have access to [12]

CNF Response: This comment would have been appropriate during Analysis, however, this area was determined not to have wilderness character.

because we own land in Midnight area and we don't want to be on wilderness or next to wilderness. [12]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Eastern half is highly departed ecosystem legacy impact of historic logging [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

This area meets the size criteria and contains a significant section of the "Rock Wall," an outstanding geologic feature of the Valle Vidal. [44]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Is not recommended by myself, there is woodcutting area, snowmobiling, private property. [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Should not be considered for wilderness because of the tremendous residential use and the economic impact that has on Red River. Personally that would also limit access to my family ranch up Mallette Canyon. We keep horses up there in the summer and need trucks to bring food and supplies to them. [12]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Evaluated Polygon Q4g

In 1980s could drive to top of Little Costilla peak, roads are evident. Mcrcystal place to west is an old road with wagon remains along the road. Road goes through the Rock wall. roads from windy gap area to the north access parts of the area. Evidence of road on Middle Ponil from before acquisition by FS. Across from Clayton corral there is of roads some go back to 1900's but are visible....Would not recommend for wilderness. [4]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

We are opposed to this parcel being recommended as Wilderness in the Forest Plan. This area has been identified as providing an optimal opportunity for future mountain bike trail development and our members are seeking to propose new trails in this landscape, and we therefore request that it is not included in your final Recommended Wilderness classification for these reasons. [8]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

NMWF agrees with the Forest Service's finding that this area has wilderness Character. [18]

The addition of wilderness to an already well managed landscape, would enhance the area's overwhelming naturalness and provide a whole other level of backcountry experiences for hunters, hikers, stargazers, campers, and wildlife viewers. [18]

Opportunities for solitude abound in the area as no roads or motorized trails that are open to public use are absent from the area. [18]

The Federal mineral rights have been withdrawn in the larger Valle Vidal including this area, so the threat of mineral development is non-existent. [18]

CNF Response: This comment was considered during Evaluation and is addressed in the

documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

This area of outstanding natural beauty has unique wilderness characteristics. It contains the Whitman Vega, a critical winter habitat for components of one of the largest elk herds in New Mexico. It also includes the proposed "Upper Ponil Botanical Area" to protect the largest stand of the largest diameter, tallest bristlecone pines in the world. [44]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

There are stock/wildlife ponds that will need to be cleaned in the proposed area. This pond is located about 1/4 mile west of the cattle guard on the rock wall. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Defenders of Wildlife agrees that this area has wilderness character. The area is very important for water supplies and fish, particularly the Rio Grande cutthroat trout. Primitive and untrammeled character dominates the landscape. The area does not have any permanent structures. Any scattered imprints of man are substantially unnoticeable, especially relative to the vastness of the larger Valle Vidal landscape. The vegetation and wildlife in the area appear natural and normal. Opportunities to hike, hunt, stargaze, camp, view wildlife and otherwise enjoy primitive recreation abound. The area contains no roads or motorized trails that are open to public motorized use. The sights and sounds of nature dominate the landscape. The federal mineral rights have been withdrawn in the larger Valle Vidal, including this area, so the threat of mineral development is non-existent. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Valle Vidal has all the hallmarks of wilderness character: great primitive outdoor recreation potential, ideal for solitude and primitive recreation, apparent naturalness, and manageability. I applaud the Forest Services assessment. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

I agree with the FS's conclusion here that this portion of the Valle Vidal has wilderness character. This is stunning country that is undeveloped and plenty of opportunities to find solitude and partake in unconfined recreation. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The sights and sounds of nature dominate the landscape. Boundless opportunities for primitive recreation, such as hiking, hunting, camping, viewing wildlife and blue skies. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the

documentation of the Evaluation process and rational.

The Grassy Creek/Holman Creek headwaters area is one of our family's favorite spots. We go there a couple times a year and have never once run into anyone else. It is a perfect place for solitude and primitive recreation. The area is wild with much “apparent naturalness”. The size and manageability of the area also meet Wilderness criteria as the area is surrounded by other forest service lands and the Vermejo Park ranch. The area has outstanding wildlife values for cutthroat trout and elk as well as ability to provide crucial wildlife connectivity corridors. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

This area of the Valle Vidal is one of the most magical places in the whole forest. Our whole family loves it here and our trips to this area are some of our most special times of the year. We find solitude and opportunities for unconfined recreation. The apparent naturalness of the area is high. We love it! [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

This area, north of FR 1950, spans both the East and West halves of the Valle Vidal, in both Taos and Colfax County. It encompasses 33,589 acres, and meet the requirement on size. This area has unique wilderness characteristics, outstanding natural beauty, and great opportunities for solitude and wildlife viewing. [33]

This area includes Little Costilla Peak, (12,584’) the tallest peak in the Valle Vidal. It also contains the north section of the “Rock Wall”, one of the outstanding geologic features of the Valle Vidal. This area contains the Whitman Vega, which is critical winter habitat for components of (one of) the largest herds of elk in the state. From Clayton Corrals, there are outstanding views of the Valle Vidal, and of the Wheeler Peak Wilderness. [33]

This area also includes the proposed 4,076 acre “Upper Ponil Botanical Area”, to protect the largest stand, largest diameter, and tallest bristlecone pines in the world. The Proposed Forest Plan Amendment was entered into the Federal Register by the Carson National Forest, on June 14, 2005. The Carson should consider and include the provisions in this Proposed Amendment in the Forest Plan Revision. [33]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment may also be appropriate during the development of plan components.

Q4g - Valle Vidal - The area identified in Q4g as having wilderness character includes approximately 1,900 acres of land that is within the patented boundaries of the Sangre de Cristo Land Grant (See attached map Sangre de Cristo & Wilderness Character Area Overlap). Therefore that portion of the identified area is former common land of the land grant. Based on the fact that there is an overlap with the patented boundaries of the Sangre de Cristo Land Grant it is recommended that the 1,900 acre portion of land within the Sangre de Cristo patented boundaries be not be included in the recommendation for designation as a Wilderness. [47]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

- 1) NMDA Recommendation: Remove from further consideration. Below is a list of features and concerns that should exclude this polygon from further consideration in the Evaluation Phase. The reasons for excluding polygons with these specific features are found in the “Issues of Concern” section above. [3]
- 2) Evaluation Criteria Definition Matrix
 - a) Criteria 1: Apparent naturalness
 - i) Wildfire Hazard Potential
 - (1) Much of this polygon has a rating of “high” and some areas have a rating of “moderate.”
 - ii) Invasive Species
 - (1) There are 76.5 acres of areas with invasive species within and directly adjacent to this polygon (adjacent infestations should be treated the same as those within the polygon due to the margin of error in the accuracy of the GIS location of the infestations and the potential for invasive species to spread into the polygon).
 - (a) Bull thistle (*Cirsium vulgare*) – 3.066 Total Acres – Class C
 - (i) USFS Site ID 030207_CIVU_11 – 0.076 acres
 - (ii) USFS Site ID 030207_CIVU_408 – 0.427 acres
 - (iii) USFS Site ID 030207_CIVU_407 – 0.427 acres
 - (iv) USFS Site ID 030207_CIVU_406 – 0.427 acres
 - (v) USFS Site ID 030207_CIVU_405 – 0.427 acres
 - (vi) USFS Site ID 030207_CIVU_404 – 0.427 acres
 - (vii) USFS Site ID 030207_CIVU_403 – 0.427 acres
 - (viii) USFS Site ID 030207_CIVU_402 – 0.428 acres
 - (b) Cheat grass (*Bromus tectorum*) – 70.741 Total Acres – Class C
 - (i) USFS Site ID 030207BRTE_KAS_0608 – 4.68 acres
 - (ii) USFS Site ID 030207BRTE_MMD1501F – 22.333 acres
 - (iii) USFS Site ID 030207BRTE_MMD1501E – 22.32 acres
 - (iv) USFS Site ID 030207BRTE_MMD1501D – 21.408 acres
 - (c) Canadian thistle (*Cirsium arvense*) – 1.606 Total Acres – Class A
 - (i) USFS Site ID 030207_CIAR4_12 – 1.193 acres
 - (ii) USFS Site ID 030207CIAR4_MMD1511 – 0.002 acres
 - (iii) USFS Site ID 030207CIAR4_MMD1510 – 0.212 acres
 - (iv) USFS Site ID 030207CIAR4_LKM1224 – 0.176 acres
 - (v) USFS Site ID 030207CIAR4_MMD1504 – 0.015 acres
 - (vi) USFS Site ID 030207CIAR4_MMD1503 – 0.008 acres
 - (d) Black henbane (*Hyoscyamus niger*) – 0.316 Total Acres – Class A
 - (i) USFS Site ID 030207_HYNI_1 – 0.316 acres
 - (e) Field bindweed (*Convolvulus arvensis*) – 0.013 Total Acres (not a listed Troublesome Weed of New Mexico)
 - (i) USFS Site ID 030207COAR4_LKM1227 0 0.013 acres
 - (f) Yellow toadflax (aka butter and eggs) (*Linaria vulgaris*) – 0.769 Total Acres- Class A
 - (i) USFS Site ID 03020772061 – 0.769 acres
 - iii) Constructed Features
 - (1) The Old Shuree Cabin is within this polygon near the southern boundary.
 - (2) All the constructed features listed under Criteria 5 (related to constructed features for grazing allotments) detract from apparent naturalness and should be considered under Criteria 1, as well.

- b) Criteria 2: Opportunities for Solitude or Unconfined Recreation
 - i) The southern boundary of this polygon is Forest Service Road 1950. This road will impact opportunities for solitude by creating noise and traffic in the southern portion of the polygon. There are also several other forest service roads that still remain within the southern portion of the polygon – see the “Roads and Trails” section under Criteria 5 for more specific detail.
- c) Criteria 4: Unique and Outstanding Qualities
 - i) Important Watershed Features
 - (1) There is one seep or spring on the southern boundary of this polygon without an ID number.
 - (2) There are two perennial streams within this polygon: the Middle Ponil Creek and the Grassy Creek.
 - (3) There are five unnamed water bodies within the southern portion of this polygon.
- d) Criteria 5: Wilderness Characteristics Manageability
 - i) Impaired Surface Waters
 - (1) This polygon contains several impaired surface waters that will need access in order to restore them: Leandro Creek, Little Costilla Creek, Holman Creek, Grassy Creek, Middle Ponil Creek, and McCrystal Creek.
 - ii) Grazing
 - (1) Allotments
 - (a) This polygon is wholly within the Valle Vidal grazing unit, which is utilized by nine permittees. A fence runs along the northern boundary of this polygon, which must be regularly maintained by grazing permittees.
 - (b) Also within this grazing allotment are four grazing pastures: the La Cueva pasture, the Comanche pasture, the Shuree Canyon pasture, and the McCrystal pasture. All these pastures have fences that must be regularly maintained by grazing permittees.
 - (2) Constructed Range Features
 - (a) Fences
 - (i) Allotment boundary fences: ID No. 7962; ID No. 7958; ID No. 7959, ID No. 7961; two fences without an ID number on the eastern portion of the polygon.
 - (b) Range Enclosure Fences
 - (i) There are three range enclosure fences very close to the eastern boundary but just outside the polygon (none have constructed feature IDs).
 - (c) Cattle Guards
 - (i) There are three cattle guards along the southern boundary of this polygon.
 - (d) Gates
 - (i) There are two wire gates on the southern boundary of this polygon.
 - (e) Windmills and Water Improvements
 - (i) There is one steel tower windmill with a well (Rockwall WM 7927) on the eastern boundary of this polygon.
 - (ii) There is a water storage tank (Rock Wall Tank) within this polygon near the eastern boundary.
 - (iii) There are three pit tanks within this polygon near the southern boundary: Deer Tank – ID No. 7946, Aspen Tank – ID No. 7942, Meadow Tank – ID No. 7946, and Timber Tank – ID No. 7944
 - (3) Roads and Trails
 - (a) There are ten small roads still within the boundary of this polygon: Route No. UD7_964, Route No. UD7_852, Route No. UD7_981, Route No. UD7_1167, Route No. 1908, Route No. 1911, Route No. UD7_859, Route No. UD7_880, Route No. UD7_881, and Route No. UD7_883.
 - (4) Fire History
 - (a) The Old Shuree Cabin Fire burned within this polygon in 2009 (no size or cause

- information provided).
- (b) The lightning-caused Windy Gap Fire burned between 10 – 99.9 acres within this polygon in 2011.
 - (c) Another lightning-caused Windy Gap Fire burned between 0 – 0.25 acres within this polygon in 2013.
- (5) Management of Surrounding Lands
- (a) Two land grants are within this polygon: the Beaubien and Miranda Land Grant and the Sangre de Cristo Land Grant.
 - (b) A small town, the McCrystal Place, is on the eastern boundary of this polygon.
- (6) Wildland-Urban Interface
- (a) The East Valle Vidal WUI is within a large portion of the northeastern portion of this polygon. [3]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Camino Real Ranger District

It is blatantly self evident, wilderness expansion into the Santa Barbara and Las Trampas Land Grants are not supported by the majority of the local residents in Penasco and surrounding villages. Most if not all opponents of this expansion, believe the... [47]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

November 7, 2015: The Wilderness Coalition held a meeting at the Penasco Community Center to unveil their plan for Wilderness and Special Management areas. The meeting ended with our communities (Penasco and surrounding communities) voting unanimously against any wilderness expansion....A petition against the expansion was signed by 340 residents....Resolutions against wilderness expansion were passed by the following political subdivisions of the state of New Mexico: [6]

1. Mora County Commissioners
2. Rio Arriba County Commissioners
3. New Mexico Acequia Association
4. New Mexico Stockman's Association
5. New Mexico Land Grant Consejo
6. Santa Barbara Land Grant
7. Santo Tomas Apostol del Rio de las Trampas Land Grant....

July 5, 2016: the New Mexico Legislative Land Grant Committee voted 8-1 against the proposed Wilderness expansion under consideration by the FS, and asked that their letter affirming this vote be counted in the comments phase of the planning process. The New Mexico Legislative Land Grant Committee will write a letter to the Pecos Expansion Coalition group opposing their proposed expansion. [6]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

all C areas should be removed [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I believe that instead of designating wilderness, the FS should concentrate on the health (i.e. thinning). Thinning projects would help the local economy by employing local workers. C5 / C11 /C14 / C7 / C6 /C15 / C2 should not be included!! [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

For Hwy 518 north to Pueblo Ridge, also do not want to see wilderness b/c of highly departed and WUI and water sources for acequias and communities. [16]

CNF Response: This comment would have been appropriate during Analysis, however, this area was determined not to have wilderness character.

There is a robust set of mtn bike recreational trails throughout the C4, C10, C13, C12 areas, including Picuris Peak. [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The forest plan should not recommend that the Santa Barbara and the Las Trampas Land Grants be considered for wilderness designation. These Land Grants are not suitable for wilderness designation because they are for communal use by the heirs. There would be a negative impact on the cultural lifestyles of the Land Grants heirs if these Land Grants were designated for wilderness. The heirs need to have access to firewood for heating and cooking since there is only propane available. The heirs live close to these Land Grants and if designated a Wilderness, there would be extreme fire danger because timber thinning will not be allowed. [35]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

"Any inventory made by the Forestry Service should be respectful of the Santa Barbara and Las Trampas Land Grants. These areas should not be considered for any type of Wilderness designation because it would limit the communal use of the lands by the heirs of these land grants. [35]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

An important point made by the U.S. Forest Service is the determination for Wilderness designation. Any land designated for wilderness must be suitable for consideration. Land Grants are not suitable because of;

- the question of rights to the lands by heirs, the Land Grants are currently in dispute
- the economic hardships for people to get fire wood since there is only propane available
- the extreme fire danger to people (no timber thinning)

- the proximity of homes adjacent to the Wilderness proposal (fire danger)
- the negative impact on the cultural lifestyles of the Land Grant heirs" [35]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Camino Real South Evaluation Area

Any additional wilderness on the western slop of the Pecos Wilderness will Directly affect the water shed of all the communities of Las Trampas and the Santa BARBra Land Grant. A wild fire or any part of the werstern slop of the Pecos will Directly impact the Quality of water of all our communities. Any Additional wilderness area will create more fuel to Destroy all our water. [6]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

(a) I do not Agree with your evaluation on the Area or within the Santa Barbra Landgrant, because Although the forest Service has managed This Land for an X amount of time, This Land belong's to the community of Santa Barbra. (b) This Land is sacred Land. (c) This is part of our watershed and we certainly do not want this Land start on fire and not be able to get to it Imedetly with Mechized Vehical's (d) We The Heirs of the Santa Barbra Land grant feel That The forest Service has closed most of the Roads, we used to use for our sustanibity, just to meet The Roadless Area's for wilderness. [6]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The Forest Service has closed sacred Roads Like The Agua Piedra Rd, The bear Mt. Road, The Placita Rd The Osha Canyon Rd were also closed. [6]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

The process may have found wilderness character, however the areas are in historic land grants – areas still being used by our communities. This Wilderness issue will have a negative effect on land grant communities. [6]

The Santa Barbara and Las Trampas land grants area extremely concerned about the forest health and the watersheds in the Santa Barbara which feeds all the acequias and then feed into the Rio Grande which flows and services our state and Texas. The FS has an obligation to manage these watersheds for the utmost protection of all water users. [6]

Wilderness would impair the Right of Way to our acequias. [6]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Wilderness has a tremendously negative impact on land grant communities. [6]

In our area, wilderness consideration is on areas where roads which had been used, are now closed. In Agua Piedra, the closed road goes right through the center of the Santa Barbara land grant, and if there is no road or a closed road, this allows the area to have Wilderness characteristics. [6]

The canopy in the area under consideration is so dense, it's a catastrophic fire waiting to happen and when it does, the watershed will be destroyed for decades. [6]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

If the Land Grants turn into wilderness what will the Heir's they will not have any property to take care of it when the Heir's children can have the land and continue where the elders left off at? [6]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

We agree with and support the Carson's finding that the Embudo Creek watershed evaluation area has wilderness characteristics. Communities in Northern New Mexico depend upon the clean dependable water supply that flows off Forest Service land to feed our acequias and farms and provide clean drinking water. Wilderness protections for the lands identified in the Pecos Wilderness Expansion proposal, including the Embudo Creek Watershed evaluation area, will ensure that the headwater systems for both the Pecos and Rio Grande watersheds are preserved for downstream users. [22]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Leaders from these communities expressed concerns about existing use restrictions on U.S. Forest Service lands within the Santa Barbara watershed. They stated that most of the homes in the area are at least partially dependent on fuel wood to heat their homes in the winter, and they requested an increased number of woodcutting permits to meet this need and reduce the potential for forest fires. They also stated that the watershed is their source for potable and agricultural water, which heightens the consequences for their communities in the event of a major fire. Referring to these points, they expressed strong concerns about whether expanded wilderness designations would prevent effective fire prevention and response actions. [37]

An additional issue raised by the leaders of Las Trampas and Santa Barbara was that the upper Santa Barbara watershed was part of the original grant of lands that established their communities in the 1700s. They expressed a concern that a wilderness designation would cut off any further discussions regarding those grants, as well as discussions about gaining traditional and cultural use access for community members. [37]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Located in the Carson and Santa Fe National Forests, our proposed north side additions to the Pecos Wilderness drape across the northern border of the Wilderness. The area arcs from Rio San Leonardo on the west to Rio La Casa on the east. Multiple creeks in the area feed the Rio Las Trampas, Rio Santa Barbara, the Rio Pueblo, and the Rio Mora, which ultimately drain into the Rio Grande and Arkansas River. This natural ecosystem produces clean water for New Mexico. The proposed north side additions

are entirely within U.S. Forest Service Inventoried Roadless Area (IRA) land. On the Carson National Forest side, our proposed additions are contained within wilderness inventory polygon C14. These proposed northern additions are part of a larger proposal and active conservation campaign to legislatively designate additions to the Pecos Wilderness as well as three Special Management Areas (SMAs) in both the Carson and Santa Fe National Forests. A map of the full proposal is available as Attachment A, and the website for the legislative campaign is online at www.protectthepecos.org. [10]

Apparent Naturalness

The proposed northern additions to the Pecos Wilderness appears predominantly natural and undeveloped, with the scattered imprints of man substantially unnoticeable. Plant and animal communities and ecological conditions appear natural. The flora is typical of the Pecos Wilderness and the region, including at lower elevations box elder, maple, juniper, scrub oak; then Douglas fir, blue spruce, ponderosa, quaking aspen farther up. Riparian areas are lined with chokecherry, red raspberry, thimbleberry, gooseberry, strawberry, yarrow, wild rose, geranium, bluebell, Solomon's seal, Indian paintbrush, and more. The undeveloped, natural environment includes now-impassable old logging two-tracks that are covered with downed trees and revegetated with saplings. [10]

In the western portion of the proposed northern addition, the experience of undisturbed wild lands is heightened by the seeping headwaters of Indian Creek. Its flow of fresh cool water is audible under the stones of vast boulder talus slopes. Where it reaches the surface, Indian Creek runs vigorously and its banks are thick with moss and wildflowers. [10]

The area includes many small undisturbed meadows that are abundant with wildlife. Animal tracks and trails from coyote, rabbit, deer, and elk criss-cross Trail 27. Turkeys are in abundance. Marmots, pikas, and bighorn sheep live at the higher, rockier elevations. Red-tailed hawks soared above. [10]

In the central portion of the proposed northern addition, vigorous waterways include Cordova Canyon Creek, Agua Piedra Creek, as well as abundant marshy areas called Los Esteros. [10]

There are several meadows loaded with wildflowers and rich riparian vegetation along the waterways. Most of the landscape off-trail is densely forested with old and new growth ponderosa, oak, aspen, spruce, fir, and juniper. There was evidence of bear, deer, elk, many songbirds, squirrels, and small mammals, such as the long-toed track of raccoon. Bighorn sheep were seen above treeline near Jicarita Peak. [10]

The eastern portion of the proposed northern additions cross from the Carson to the Santa Fe National Forests. This portion of the northern addition excludes the La Sierra Ditch, which is a 19th century acequia designed to bring water down from the Rio Angostura into the Mora Valley. The area contains abundant running water from creeks and many springs that feed the ditch and the Rio Alamos in Mora County. [10]

The riparian environment fills the trees with songbirds; there is a carpet of green undergrowth. Bear claw scratch marks decorate the trunks. Deer tracks cross the trail at regular intervals. Plant and animal communities in the riparian environment appear natural. [10]

The area appears to have been clear-cut many years ago, but now because of the protections of the IRA under the Roadless Area Conservation Rule, the forest reflects normal ecological conditions. The plant and animal communities appear substantially natural within the area as a whole. Chipmunks chatter, woodpeckers drum, and songbirds trill throughout the forest. [10]

As the trail nears the wilderness boundary the forest becomes more spacious. Because of the altitude gain and steeper slopes, the growth is diverse and healthy. [10]

Outstanding Opportunities for Solitude or Primitive and Unconfined Recreation

Few humans visit the westside of the proposed northern additions, allowing time, silence, and space for reflection on the relationship between human and nonhuman in wild places. [10]

The Las Trampas Campground serves as the trailhead for San Leonardo Trail 30. San Leonard Trail is rocky and climbs quickly up to 11,360 feet through dense conifer forests to San Leonard Lakes. The trail is rugged but suitable for hiking, hunting, bird-watching, and horseback riding in summer and fall and for cross-country skiing, winter camping and snowshoeing in winter and early spring. Many downed trees block Trail 30 giving the deep sense of solitude and near-bushwhacking adventure. The trail above treeline is rugged and marked only with cairns. [10]

Indian Creek Trail 27 crosses the Santa Barbara Creek at the Santa Barbara Campground. It follows the creek north to Jicarita Peak National Recreation Trail (NRT) 27 and heads east to Jicarita Peak, a jewel on the north boundary of Pecos Wilderness. The trail begins at elevation 8,800' rising to 12,200' at the base of the peak on the wilderness' north boundary. The NRT was designated in 1979 as a trail suitable for camping, equestrians, hunting, hiking, camping, bird watching, and wildlife observation, and it is still ideal for those activities. The National Recreation Trails website describes this portion of the IRA as "a challenging, but unforgettable, Pecos Wilderness experience ... The trail gets faint above treeline, so routefinding skills are essential. Elk, marmot, ptarmigan, deer, and black bear are some of the wildlife to be found in the area."ii (Note that the area is already referred to as part of the Pecos Wilderness.) [10]

Scenic vistas for simple gazing or photography are around every corner of these trails. In the evening, the sun sets over distant Pedernal, the iconic Sleeping Woman Mountain of indigenous tribes. The night sky is hypnotizing, so bright that even without a moon one hardly needs a headlamp. [10]

The central portion of the proposed northern addition might be the least explored of the southern Carson National Forest. [10]

Comales Trail 22 delineates the north boundary of the Pecos IRA and the south boundary of the proposed Santa Barbara SMA, which is being considered by groups working to legislatively designate additions to the Pecos Wilderness. Access to this section begins on non-motorized Trail 19A at the Agua Piedra Campground in the proposed SMA. It intersects with Comales Trail 22, which climbs northwest from about 9,000' to 11,500'. In the middle of August, no people were seen on the eight miles of Trail 22 from the junction with 19A at Agua Piedra Creek to Rio Santa Barbara Creek on the west side of the IRA. [10]

Beautiful meadows and abundant water offered many opportunities for camping, horsepacking, and other backcountry recreation. The terrain gains in altitude quickly so hikers are challenged as well as treated to diverse natural environments from riparian streamsides, rocky cliff faces, wide meadows full of flowers, rocky trails through junipers, towering ponderosas, aspen colonies (exquisitely golden in fall), and scrub oaks. There is even a cool seeping spring on the descent to Santa Barbara Campground. The silent night sky offers the full expanse of the Milky Way. [10]

For nature lovers, the diverse landscape is abundant with Northern New Mexico wildflowers throughout the spring, summer, and fall. These include irises, columbine, lupine, purple loosestrife, daisies, coneflowers, milkweed, perennial peas, asters, Indian paintbrush, and more. [10]

For hunters, elk roam the area above treeline in fall. When it snows, the trails can provide a cross-country ski or snow-shoe adventure across the same terrain. [10]

At various sections along the trail one can see all the way to Jicarita Peak, Truchas Peaks, Trampas Peak, or Wheeler Peak, giving the viewer a full experience of standing "where the earth and its

community are untrammelled by man, where man himself is a visitor who does not remain.” [10]

The eastside of the proposed northern addition is defined by steep slopes and dense underbrush. [10]

There are no old roads or trails other than Serpent Lake Trail 19 leading into the Pecos Wilderness. [10]

This is very wild country. There is so much acreage in the proposed northern additions that, although the trailhead for Trail 19 appears relatively popular, people fan out. Trails 19A and 493 head north into the IRA and SMA. Backcountry enthusiasts can also enter the southeastern portion of the proposed northern addition using Trails 233, 266, or 269. [10]

Supplemental Values

The lands that comprise the northern additions are in the top two tiers (out of six) in terms of their crucial habitat ranking under the New Mexico Department of Game and Fish (NMDGF) Crucial Habitat Assessment Tool. See Attachment B Maps. NMDGF identified the area as winter habitat for elk. See Attachment B Maps. Through determined restoration efforts in the 1960s, there is a healthy population of Rocky Mountain Bighorn Sheep at the highest elevations of the area. Attachment B includes a map that displays NMDGF identified Bighorn Sheep habitat in the area. [10]

A cousin of the rabbit, Pikas are small, tail-less inhabitants of rocky places at altitudes of 8,000 to 13,500 feet in the proposal area. Pikas are being studied as early indicators of the effects of climate change on wildlife and were recently proposed for inclusion on the list of endangered species. Their populations in the Pecos Wilderness and the northern additions offer excellent opportunities for the New Mexico Pika Monitoring Project to observe and study this ubiquitous alpine inhabitant.[10]

The Carson National Forest hosts numerous ecosystem types that are poorly-represented in the National Wilderness Preservation System (NWPS). We calculated the proportion (%) of each Forest Service wilderness inventory area that is composed of ecosystems inadequately represented in the NWPS. See Appendix 1. Based on this analysis we found that 30% of inventory unit C14 is comprised of ecosystem types that have only 5-9.9% representation federally; and 40% of C14 has only 10-19.9% representation federally. Together 70.8% of the C14 is comprised of ecosystem types that have less than 20% representation in the NWPS. You will recall that our proposed northern additions to the Pecos Wilderness are only a fraction of inventory unit C14. See Appendix 1, Tables 1-3 for more information about the ecosystem types found in unit C14, and their representation in NWPS. [10]

Manageability

The Pecos Wilderness is located directly south of the proposed northern addition. Shape and configuration of the lands on the north-side make them a natural extension of the Pecos Wilderness. The lands that comprise the northern addition are already designated as an IRA offering protections from roadbuilding. The qualities of wilderness already flourish. Recommending these lands for wilderness would result in management consistency and continuity between the wilderness and IRAs. [10]

The proposed northern addition to the Pecos Wilderness is completely surrounded by public lands. The central and east portions of the northern addition do not include private in-holdings. [10]

The trails located in the proposed recommended wilderness area are well-marked with signs and gates restricting motorized vehicles, which will help ensure the area is managed for non-motorized use. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale. This comment will also be carried forward and considered during the Development of alternatives (including a proposed

Wilderness Recommendation) and/or the effects analysis of alternatives.

This area, adjacent to the North Boundary of the wilderness, has unique wilderness characteristics, with outstanding natural beauty and scenic values. It meets the size requirement and should be included in the inventory. This is an area currently being proposed as a wilderness addition, and should be managed to protect its wilderness character, until Congress has a chance to make a decision to designate as Wilderness. [33]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The imprints of man's work are still seen all over from when the lumber companies wrecked havoc on the Carson forest. Roads were all over the place when it was convenient, so these areas are not really roadless. [48]

Forest don't have to be wilderness to find solitude. [48]

The areas above Vadito to Truchas should not be considered for wilderness because they are the historical common lands of the communities. The number one priority for not including the common lands for wilderness is because our watershed is the common lands of the land grant communities. All the watershed will need to be thinned out eventually. Roads will have to be reopened to accomplished that. [48]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Climate change, which is a manmade phenomena, has changed the forests and land so premise that land is 'natural' is not valid. It is especially important with the forests in Santa Barbara because trees being infested from droughts, sense – present fire hazard – and need to be managed – thinning needed [15]

CNF Response: This comment will be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

C14 and C11 I am a Santa Barbara grazing permittee on which we need motorized vehicles and chain saw to maintain fence and trails, water drinker. Also to harvest hay from Hodges Meadows and to harvest wood for heating and vigas to maintain our barns and homes ... and our acequias and hunting in our back yard. We were born and raised here, and this is our livelihood. Which are on map. We don't need no more wilderness. [15]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

C5, 14C and C11 should be completely off your recommendation for wilderness and designated areas. [15]

CNF Response: This comment will be carried forward and considered during the development

of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Las Trampas Land Grant – for solitude – recreation – getting wood, herbs [15]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

The recommended additions to wilderness in C-14 X and C-14V are inappropriate because of the encroachment of 2 land grants, the Santa Barbara and Las Trampas land grants. [49]

The recommendations for addition of C-14 X and C-14 V violate the New Mexico Constitution Sec. 5 that states, "The rights, privileges and immunities, civil, political and religious guaranteed to the people of New Mexico by the Treaty of Guadalupe Hildalgo shall be preserved inviolate." [49]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The Wilderness Act of 1964 is an archaic Act, with the 5 criteria not taking into account the historical and cultural use of the land referred to in C-14 X and C-14V, nor the consequences of forest fire in additional wilderness and the proximity of nearby communities in C-14 X and C-14 V. [49]

When the criteria was set, the world was not in climate change. We are witnessing climate change and with it comes uncertainty. Drought will force us to rethink these rules and reexamine a more aggressive plan for forest thinning to increase the Embudo Watershed area. It is time to rethink the appropriateness of these 5 criterion and change archaic laws. [49]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

...the NMAA does not endorse the wilderness expansion because of a lack of recognition of the importance of the historical connections to the lands affected to community land grants and acequias, because wilderness designation would preclude certain types of restoration, such as thinning, which could reduce the risk or severity of wildfire, and because access for traditional uses, including common activities of maintenance and improvements of acequias, would be prohibited. Although it has been explained that this specific proposal does not directly impact access to irrigation structures, we remain concerned about wilderness areas generally and the restrictions imposed on historic, traditional uses of acequias in designated wilderness areas. [41]

The leadership of the NMAA appreciates the intent of protecting lands in the proposed expansion area from uses that could be detrimental to the health of watersheds that are the source of water for Native American Pueblos, community land grants (mercedes), and downstream acequia communities. In particular, we agree with the goal of protecting such lands from mining and oil and gas drilling. [41]

However, we do not agree that any additional restrictions on access to lands in the proposed area be imposed on local communities who use such areas for a variety of traditional uses. Nor do we support restrictions on access that would limit future options for watershed restoration that could improve the health of the forest. [41]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis

of alternatives.

...we believe that any expansion of the Pecos Wilderness would create an additional risk of catastrophic fire in that area. Such a fire could have devastating and lasting effects on many communities and the acequias. As you have already seen and know wildfires can have devastating effects on our communities. [50]

Preserving our precious natural resources for future generations is a belief we also hold and one I am sure you hold as well. It is for this reason that we recommend that you consider participation in the planning process and support forest plans that consider the importance of healthy and well managed watersheds rather than what we currently have. We have already seen the effects of wild fires. [50]

At a public meeting held on November 4th, 2015 in Penasco, there was overwhelming opposition to any expansion of the Pecos Wilderness. Participants. At this meeting many shared similar concerns of forest management and the danger of fires. They also voiced opposition to any expansion of the Pecos Wilderness. To that end, the Commission has serious concerns of the proposed expansion. [50]

The proposal promoted and benefits described by the Wilderness Alliance may have the unintended effect of placing additional stress on traditional uses of water. It may also present other problems for acequias and communities as well. Decades of poor forest and watershed management already threaten our communities and the acequias. Further expansion of the Pecos Wildness is, in our opinion not in the best interests of those of us who depend on our watersheds.[50]

We, therefore ask that you please consider the importance of having a healthy forest plan, one that considers the importance of healthy watersheds. [50]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

...the proponents of the additional wilderness designations and Special Management Areas (SMA) have shown little concern that their actions would directly impact the customs, culture and economic opportunities of many communities in Taos and other counties. At a recent meeting in Peñasco I heard that these proposed designations would save the communities from the impacts of mining, oil and gas drilling, additional road development and commercial logging. While the aforementioned activities may or may not be palatable to everyone, each of these undertakings are part of multiple use activities prescribed by law, and if proposed, both the communities and the County have both the right and obligation to determine whether these uses are appropriate, during a mandated public process. [42]

What I found interesting at the meeting is that the proponents of the wilderness and SMA designations didn't address directly the impact that these designations would have on cattle grazing, which has been a fundamental part of these rural communities since their founding. The addition of a wilderness overlay on existing grazing allotments would preclude the use of any mechanized equipment to maintain the existing infrastructure, whether we are talking about fencing, spring or stock pond maintenance or any other undertaking which would normally mechanical implements. As we found out in the Gila Wilderness, and confirmed in a study published by the Range Improvement Task Force at New Mexico State University, the burdens of trying to maintain infrastructure in a wilderness area with non-mechanized tools, over many years, has caused a drastic reduction in the number of cattle grazed in that area which led to a decline economic activity and thus the demise of numerous communities. [42]

Additionally, the proposed wilderness designations would preclude any active forest management or effective response to wildfires occurring in these heavily vegetated areas due to the inability of the federal government to attack a fire where roads and mechanized equipment are not part of the equation,

except in extreme circumstances. This also creates the potential to negatively impact the numerous acequias that are the lifeblood of these rural communities, and the fiber, in terms of firewood, that allow these people to maintain their imprint on the land as they have for many centuries. [42]

If we deprive ourselves of the opportunities that are gained from the multiple use of our lands we do a disservice to the self-determination of our communities and we handcuff the ability of our governments to determine that which is in the best long-term interests of the constituents they serve. [42]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

In the morning of July 5th, the committee heard from Merced de Santa Barbara and Merced de Santo Tomás Apóstol del Rio de Las Trampas board presidents Bonifacio Vasquez and Alex Lopez, respectively. [43]

In a prepared statement Vasquez said, “Get the boot of this progressive giant off our back and let us restart the timber industry. Allow free market principles and put people back to work on the treatment of our forests. This would improve our economy and improve the health of the forest and secure our watershed.” [43]

Vasquez presented a Santa Barbara Land Grant resolution dated June 26th, opposing any wilderness expansion. It urges “the Taos County commission, the congressional delegation and the wilderness advocates to consider the historical significance of the land grants and the necessary and historical use of the common lands by the communities.” [43]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

We oppose the Pecos Wilderness Expansion for the following reasons: [51]

It will prevent fire mitigation due to limited manpower available that would be required to use crosscut saws to manage the forest versus machinery.

With the forest being more prone to fire, it will tap more resources from our already over stretched forest service to fight the additional fires caused by such designation.

Limits a number of recreational uses.

Being one of the more depressed economies in the nation; limiting activities in the proposed area will decrease the number of tourists who come visit the area who help fund the economy. The local communities also rely on the forest for wood.

Lost opportunities for economic activity and development.

There are great motorized trails in the area and losing those would reduce tourism.

The forest will not be able to be managed properly and therefore less water will go into the watershed therefore hurting farmers, ranchers, the pueblo and others who rely on the water from these mountains.

Young people can't afford homes with the rising home prices and lack of opportunity that comes with this designation and will continue to leave our community and not come back due to the reduced economic development and recreational opportunities that people want for improved quality of life.

A number of the traditional benefits of the forest would be harmed, or potentially would be, including, gathering firewood, harvesting lumber for vigas, latillas, and other construction needs, livestock grazing, hunting and fishing, collecting medicinal herbs and clay for pottery making, irrigating with acequias (historic water ways for irrigation still in use today).

Reduce the ability to manage wildlife habitat. Not much lives in an overgrown thicket.

Mountain Biking is becoming more and more popular and even bikes are prohibited in Wilderness.

Providing business and income opportunities (e.g., commercial services) through special use permits would not be possible in Wilderness.

Economic growth from tourism from people outside of the community visiting the Carson NF that brings dollars into our community would be hampered.

Sipapu is the largest private employer in South Taos County, and believes that the local community in conjunction with local USFS personnel is best suited to manage the forest without more regulatory oversight from Washington. [51]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Inventoried Polygon C5

C5 Should not be considered because: [15]

1. Many landowners use vehicles to gain access to their private land
2. Traditionally it is used for firewood, grazing, hunting
3. Much power saw and four wheeler usage happens here. [15]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

C5 Many people need firewood from these areas; therefore we need motorized vehicles. [15]

CNF Response: This comment would have been appropriate during Analysis, however, this area was determined not to have wilderness character.

C5 should not be considered from Trampas east into the woods because of the roads that go back into the forest. [15]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

El Valle Campsite – It's not posted on hwy 76. campsites not leveled, need more tables, more grills, more restrooms, road that leads to campsites is sloped to the left and the right with ruts and deep holes and boulders, small pointed large rocks. You can only turn all the way at the top. All El Valle campsites look like the Wild West – solitude area. [15]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Section C5 is just as important for the irrigation sections to El Valle-Trampas area. [15]

CNF Response: This comment would have been appropriate during Analysis, however, this area was determined not to have wilderness character.

Inventoried Polygon C7

C7 Hodge camp area to include acequia headgates. [15]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

C7 Needed for wood cutting [15]

CNF Response: This comment would have been appropriate during Analysis, however, this area was determined not to have wilderness character.

Inventoried Polygon C11

La Junta campsites: Entire road needs to be scraped – road is very bumpy with holes and pointy rocks. Campsite needs more restrooms – more tables – more grills – solitude area. [15]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Inventoried Polygon C14

C14 around existing Pecos wilderness there is a good amount of roadless area that would likely meet characteristics – quiet, remote [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

C14 Traditional use by Sta Barbara Grant [13]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

C14 beetle contamination – needed to let people clean and utilize resources [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

C14 Beetle control [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

C14 Danger of forest fire [15]

CNF Response: This comment will be carried forward and considered during the development

of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

C14 Encroachment of communities [15]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

C14 Head gates in proposed wilderness Hodges Site!! [15]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

C14 is full of fuelwood commonly used by my family. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

C14 is part of the land grant which there are some head gates. [15]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

C14 Need the roads to stay open to get wood [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

C14 No wilderness added within land grants of Santa Barbara and Las Trampas [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

C14 Overgrowth [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

C14 Restriction to grazing allottees (elderly not allowed to use 4-wheelers etc.) [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

C14 Road are now head gate – on Hodges area [15]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

C14 Roads are already there – cannot close roads for wilderness [15]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

C14 Roads for ATV established in Bear Mtn. [15]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

C14 should not be considered to be part of the wilderness to that area is where we haul wood from, and is also used for recreation. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

C14 should not be considered wilderness due to being Santa Barbara land grant common areas. [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

C14 The need for water and resource is vital to our community. [15]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

C14 The people in our area do not have money to buy three wheelers and horses to get through the wilderness. [15]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

C14 The proposed wilderness is on the Santa Barbara and Trampas should be removed from consideration. The land grants have utilized and sustained by all common __ [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

C14 Trees need to be thinned out [15]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

C14 Hunting!! [15]

CNF Response: Commenter does not provide enough information to be used in the Wilderness recommendation process.

C14 We need access to the Comprita to manage our irrigation water. [15]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Concerned about the acequia head gate which starts above Camp Summer Life now known as the Monastery. If this part becomes wilderness, what access will there be to get there. I am the acequia mayordomo for the Placita South Side. [15]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Hodges campsite Boulders, pointy, small, big rocks and large rocks throughout campsite. Boulder rocks at campsite unable to park a camping trailer. Campsite not leveled. Two culverts exposed – 1st right middle, 2nd top half. No tables, no grills. A pond of water at entrance. Entrance getting flooded. [15]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

Sipapu ski area need area to expand management area in purple needs to be eliminated from consideration, as does roadless area surrounding ski area. [15]

CNF Response: Not directly related to Wilderness recommendation. This comment may be most appropriate during the development of plan components.

I think the north end of the Pecos Wilderness needs to be expanded to include La Jicara (Jicarita?), Ripley's point, Indian canyon, and to the east, to a boundary defined by the one existing legal When considering wilderness designation, the CNF must consider the potential for future beneficial land trades adjacent to the forest and inholdings that would correlate property boundaries with watersheds to improve ecologically based management, as well as the potential to trade for inholdings. motorized trail. There needs to be more enforcement of motorized travel rules, even in existing wilderness. The NM Wilderness Alliance has defined a proposed boundary that would expand and protect the wilderness, as well as protecting acequias and traditional uses. [16]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Northern Addition to the Pecos Wilderness [18]

NMWF agrees with the Forest Service's finding that this area has Wilderness character. Apparent naturalness, opportunities for primitive recreation because of its inherent high quality habitat, topography, proximity to existing wilderness, abundant water sources, and the fact that the area is already designated as an Inventoried Roadless Area, makes this area a natural extension of the Pecos Wilderness and deserving candidate of wilderness designation. [18]

The NMDGF has identified this area as priority crucial habitat. The healthy population of bighorn sheep that inhabits the area's high elevations is indication of the area's wild character. [18]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

South of NM 518 to Pecos Wilderness, Camino Real Ranger District - 52,625 acres. This area adjacent

to the north boundary of the Pecos Wilderness meets the size requirement and should be included in the inventory. It is currently being proposed as a Pecos Wilderness addition. [44]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Evaluated Polygon C14v

Old Santa Barbara pole and tie accessed some of area. old roads and skid trails would be visible. Need to know what are looking at as the old roads/trails blend back into woods. Would request agreement from the local communities before recommendation....Do not recommend for wilderness. [4]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

We are opposed to this parcel being recommended as Wilderness in the Forest Plan. This parcel contains existing bike trails which provide an adventurous, backcountry experience for experienced riders. We request that it is not included in your final Recommended Wilderness classification for these reasons. [8]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Add extra 'buffer zone' acreage to the wilderness to protect Serpent Lake [16]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Defenders of Wildlife agrees that this area has wilderness character. The NMDGF identified this area as priority crucial habitat. A healthy population of bighorn sheep inhabits this area at the highest elevations. This area appears natural and undeveloped. Any scattered imprints of man are substantially unnoticeable. The vegetation and forested environment appears natural. Beautiful meadows and abundant water offer idyllic opportunities for camping, horsepacking, and other backcountry recreation. Visitors are treated to diverse natural environments from riparian streambanks, rocky cliffs, meadows full of flowers, trails through junipers, towering ponderosas, aspen colonies and scrub oaks. The location, shape and configuration of the area makes it a natural extension of the Pecos Wilderness. The USFS already designated these lands as an Inventoried Roadless Area. Recommending the area for wilderness would be a natural extension. The area contains abundant running water from creeks and many springs [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Defenders of Wildlife agrees that this area has wilderness character. The NMDGF identified this area as priority crucial habitat. A healthy population of bighorn sheep inhabits this area at the highest elevations. This area appears natural and undeveloped. Any scattered imprints of man that do exist are

substantially unnoticeable. The vegetation and forested environment appears natural. Beautiful meadows and abundant water offer idyllic opportunities for camping, horsepacking, and other backcountry recreation. Visitors are treated to diverse natural environments from riparian streambanks, rocky cliffs, wide meadows full of flowers, rocky trails through junipers, towering ponderosas, aspen colonies, and scrub oaks. The Pecos Wilderness is located directly south. The location, shape and configuration of the area makes it a natural extension of the Pecos Wilderness. The USFS designated these lands as an IRA, offering protections from roadbuilding. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I concur with the Forest Services' assessment of wilderness character for this extended area adjacent to the Pecos Wilderness. This area affords great hiking, camping and remote mountain outdoor experiences, has varied and abundant alpine flora and fauna, and would be an important addition to wilderness lands within CNF. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The FS got it right here. I agree that these lands would make a great addition to the Pecos Wilderness. It's wild, undeveloped, and remote. Further, in 2001 the FS designated this area as an Inventoried Roadless Area which means the agency can't build any roads. Recommending the area for wilderness would be a natural fit. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Given the adjacency of this area to the Pecos Wilderness, it would be easy to manage this area to maintain its wilderness character. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Abundant water, riparian streambanks, idyllic camping, horseback riding and backcountry recreation. A paradise for wildlife and a natural corridor, connecting to the Pecos Wilderness to the south. [46]

These lands are designated Inventoried Roadless Area, which is a natural addition to the wilderness and stronger protections of land and water. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Beautiful meadows and abundant, running water from creeks and many springs. The location and terrain makes it a natural extension of the Pecos Wilderness. A watershed and natural extension of the Pecos Wilderness, assuring manageability. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

There are roads leading into C14-V. [49]

Many would disagree there are no roads in the area identified as roadless in C-14V. [49]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

C14v - Embudo Watershed - The area identified in C14v includes approximately 4,900 acres of former land grant common land that is within the patented boundaries of the Santa Bárbara Land Grant (See attached map Santa Barbara & Wilderness Character Area Overlap). The Santa Bárbara land grant was originally granted to the community in 1796 by Spain it was confirmed by the United States in 1894 and a patent for the land was issued in 1905. In 2001 the General Accounting Office Report, GAO-01-951, Treaty of Guadalupe Hidalgo Definition and List of Community Land Grants in New Mexico identified the Santa Bárbara Land Grant as a community land grant, meaning that the original grant documentation indicated that portions of the grant were to be held as common land for the communal use by local community. The United States confirmed the grant as a tenancy in common which subjected it to threat from a partition suit which separated the common land from the community. As a direct result a vast majority of the common lands eventually ended up in Federal hands under the management of the United States Forest Service. The community continues to rely on resources from the former common lands for sustaining their socioeconomic wellbeing and their cultural integrity. [52]

The area under consideration was designated as part of the roadless inventory by the U.S. Forest Service although it is understood that there are user created routes within the area that existed prior to the Roadless designation, prior to management by the U.S. Forest Service and prior to the United States establishing sovereignty in the Southwest. The designation as a Roadless Area has further reduced the ability for the land grant community to meaningfully access the area for traditional use purposes. Traditional uses include, but is not limited to: wood harvesting for fuelwood and building materials, gathering of forest products such as herbs, nuts, etc, grazing and watering of livestock, hunting and fishing for subsistence, gathering of earthen materials such as rock and soil. Proposing to designate the area as Wilderness will further impact the ability for the community to meaningfully access these portions of the former common land. [52]

Although some of these uses are compatible with management as a wilderness the main concern is the lack of ability to utilize mechanized equipment for accessing the area or as a means of obtaining resources for traditional use purposes. A prime example would be the further restriction of the Carson's authority to allow for limited agreed upon motorized travel for accessing resources or maintaining grazing improvements. As a result in modernization and market shifts the cost of owning a horse increases year by year often times creating a financial hardship. This hardship can at times be alleviated by utilization of modern modes of transport such as an ATV. The long term maintenance and operation costs of an ATV are far less than for a horse. Considering this the occasional use of an ATV for accessing grazing improvements within a Wilderness would be severely hampered. [52]

In addition to concern over meaningful access for traditional use purposes, the Western portion of the area identified in C14v is also critical to the stream flow for the Río Santa Bárbara, which the communities of Llano Largo, Rodarte and Peñasco are dependent on for irrigating crops and fishing as a protein source for local residents. In addition, stream flows from the Río Santa Bárbara contribute to the subsurface water that is utilized for drinking water by local residents. The Eastern portion of C14v is a major contributor to the Río Pueblo which supplies water to the communities of Angostura, Sipapu,

Las Mochas and Vadito (See attached map Santa Barbara, Trampas, and Truchas LGs, watersheds & Wilderness Character Areas). [52]

Therefore, due to the need for meaningful access for traditional uses by the local surrounding communities it is recommended that the portion of land identified as having wilderness character within the patented boundaries of the Santa Bárbara Land Grant should not be managed as Wilderness but rather with an emphasis on traditional use by the local land grant communities. In addition, it is recommended that the entire area identified in C14v not be managed for Wilderness character but rather for the protection of watershed health, for reducing the risk of catastrophic wildfire and for improving the overall forest health to be resilient to periodically occurring natural fires. Because of the significance of the areas to the quality of downstream water use it is recommended that management of the area exclude any noxious activities such as large scale mining and mineral extraction. [52]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

- 1) NMDA Recommendation: Remove from further consideration. Below is a list of features and concerns that should exclude this polygon from further consideration in the Evaluation Phase. The reasons for excluding polygons with these specific features are found in the “Issues of Concern” section above. [3]
- 2) Evaluation Criteria Definition Matrix
 - a) Criteria 1: Apparent Naturalness
 - i) Wildfire Hazard Potential
 - (1) The large majority of the eastern half of this polygon has a rating of “high” while the western half has a mix of mostly a “high” rating and “moderate” rating.
 - ii) Invasive Species
 - (1) There are 63.023 acres of areas with invasive species within this polygon (adjacent infestations should be treated the same as those within the polygon due to the margin of error in the accuracy of the GIS location of the infestations and the potential for invasive species to spread into the polygon).
 - (a) Canada thistle (*Cirsium arvense*) – 63.023 Total Acres – Class A
 - (i) Site ID 030204_CIAR4_9 – 0.144 acres
 - (ii) Site ID 030204_CIAR4_10 – 28.185 acres
 - (iii) Site ID 030204_CIAR4_11 – 34.694 acres
 - iii) Constructed Features
 - (1) The Santa Barbara Water Treatment building is within the northwest portion of this polygon.
 - (2) The Santa Barbara Forest Camp recreation sites (PLO 1120 and PLO 5128), which are developed, are still partially within the northwest portion of this polygon.
 - (3) All the constructed features listed under Criteria 5 (related to constructed features for grazing allotments) detract from apparent naturalness and should be considered under Criteria 1, as well.
 - b) Criteria 2: Opportunities for Solitude or Unconfined Recreation
 - i) Several roads are within ¼ mile of the polygon: Route 116, Route No. UD4_2041, Route No. UD4_2040, Route No. UD4_2039, Route No. UD4_2038, Route No. UD4_2034, Route No. UD4_2033, Route No. UD4_2031, Route No. 639B, Route No. UD4_2030, Route No. UD4_1502, Route No. 161, and Route No. 161E. These roads are concentrated near the western and eastern boundaries of the polygon. Even though these roads are outside the boundary of the polygon, they will likely impact a visitor’s opportunity for solitude.
 - c) Criteria 4: Unique and Outstanding Qualities

- i) Important Watershed Features
 - (1) There are two seeps or springs within this polygon (the Carex Wetland and the Salix Carex seep or spring) and two on the boundary of the polygon (the Hayfield Spring and the Lagunitas seep or spring).
 - (2) There are four unnamed water bodies within this polygon. There is also the Los Esteros waterbody on the northern boundary of the polygon.
 - (3) The Indian Canyon Stream, Jicarita Creek, Agua Piedra Creek, the Rito Angostura Stream, the Alamitos Creek, the Rio Santa Barbara, and several unnamed streams are perennial streams within this polygon.
- d) Criteria 5: Wilderness Characteristics Manageability
 - i) Impaired Surface Waters
 - (1) This polygon contains several impaired surface waters that will need access in order to restore them: Rio Santa Barbara, Jicarita Creek, and Alamitos Creek.
 - ii) Small Land Exclusions
 - (1) There is a land exclusion in the northwest portion of this polygon. The excluded area buffers out a road that goes through the area; however, the area will no doubt impact the manageability of the polygon if it is managed differently from the rest of the area – especially since this area also overlaps the Santa Barbara recreation sites.
 - iii) Grazing
 - (1) Allotments
 - (a) This polygon is within the Santa Barbara grazing unit, utilized by 13 permittees; the Knob grazing unit, 1 permittee; and the Angostura grazing unit, 2 permittees.
 - (b) Also within this polygon are several pastures: the Bottoms pasture, the Osha-Bear Mountain pasture, the Indian pasture, the Jicarita pasture, the Knob pasture, the Drop Out pasture, and the Upper Alamitos pasture.
 - (2) Constructed Range Features
 - (a) Water Tanks
 - (i) A pit water tank is within this polygon.
 - (b) Fences
 - (i) An interior range allotment fence is in the northwest corner of this polygon. The grazing pastures also have fences around them. All these fences and gates must be regularly maintained by grazing permittees.
 - iv) Roads and Trails
 - (1) Several roads are within ¼ mile of the polygon: Route 116, Route No. UD4_2041, Route No. UD4_2040, Route No. UD4_2039, Route No. UD4_2038, Route No. UD4_2034, Route No. UD4_2033, Route No. UD4_2031, Route No. 639B, Route No. UD4_2030, Route No. UD4_1502, Route No. 161, and Route No. 161E.
 - (2) Several trails are within this polygon: the Middle Fork trail (Trail No. 24), the Jicarita Creek trail (Trail No. 38), the Indian Creek trail (Trail No. 27), the Skyline Divide trail (Trail No. 36), and the Serpent Lake trail (Trail No. 19). Additionally, the Comales Cutoff trail (Trail No. 22A), and the Agua Piedra trail (Trail No. 19A) form the boundary of the northeast portion of this polygon.
 - v) Fire History
 - (1) Two unnamed lightning-caused fires burned within this polygon. One fire burned between 0.26 – 9.9 acres in 1994 and the other burned between 0 – 0.25 acres in 1994.
 - vi) Management of Surrounding Lands
 - (1) Half of this polygon is within the Santa Barbara Land Grant.
 - (2) The southern boundary of this polygon borders the Pecos Wilderness.
 - vii) Wildland Urban Interface
 - (1) Most of the western portion of this polygon is within the Santa Barbara WUI, and the northeast corner of the polygon is within the Knob WUI. [3]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Evaluated Polygon C14x

Trails were roads at one time early part of the 1900s. Would request agreement from the local communities before recommendation....Do not recommend for wilderness. [4]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

This is a photo of Indian Creek, which is somewhere around this area. These lands to the north of the Pecos Wilderness poses tremendous opportunities for solitude and primitive recreation. Wildlife is plentiful throughout the area due to the numerous streams. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

C14x - Embudo Watershed - This area is located slightly Southeast of the patented boundaries of the Santo Tomás Apostól del Río de Trampas Land Grant, slightly Northeast of the Nuestra Señora del Rosario, San Fernando y Santiago (Truchas) Land Grant and slightly South of the Santa Bárbara Land Grant. All three are active land grants with the Truchas being organized under its own state statute §49-8-1 NMSA 1978, and the Trampas and Santa Bárbara recognized by the New Mexico Land Grant Council as being organized as a political sub-division of the State under §49-1-1 NMSA 1978. The area identified as having wilderness character is critical to the water sources for the local communities of El Valle, Trampas, Vallecitos, Llano Largo, Rodarte and Peñasco, as stream flows that originate in C14x directly contribute to the quality and quantity of surface and subsurface water utilized by these communities for drinking, irrigating crops, watering of livestock and subsistence fishing (See attached map Santa Barbara, Trampas, and Truchas LGs, Watersheds & Wilderness Character Areas). In fact this area directly contributes to the stream flows of both the Las Trampas and Santa Bárbara Rivers which are critical to the survival of the aforementioned communities. If the area is designated for management as a Wilderness the Carson National Forest will be limited in its ability to use mechanized equipment as an option for actively managing the area for watershed health and for protection from catastrophic wildfire. [52]

Due to climatic change the risk of catastrophic wildfire is ever increasing as densely populated and overgrown forests increase the amount of ignitable fuels that can feed such fires. In order to protect the associated communities and the former and existing common lands of the three aforementioned community land grants surrounding C14x it is important that the Carson National Forest have the ability to utilize all possible options for actively managing the forest, including through use of mechanical equipment. [52]

The protection of the former and existing common lands are vital to sustaining the socio and economic wellbeing of the local land based communities. The local communities are still highly dependent on their surrounding forests for traditional uses such as harvesting wood for firewood and building material. The cost of propane as an energy source for both heating and cooking is often times financially burdensome for individuals in the economically depressed region surrounding C14x and C14v. Therefore the need for accessible fuelwood as an alternate energy source is still in high demand throughout the region. In addition, due to the distance from larger regional markets the cost of building

materials can also be a financial hardship for many local residents. This is a hardship that can be alleviated by having adequate access to local timber resources that can be used as building materials for personal non commercial use. Therefore, the need to protect these resources from catastrophic wildfire is much greater than in forested regions closer to major metropolitan areas. [52]

Because C14x is bordered on the South and the East by the existing Pecos Wilderness, in which both the Carson and Santa Fe National Forests are limited in their ability to utilize mechanized equipment for forest restoration, watershed health improvement and wildfire prevention and protection projects, it is imperative that a broad buffer where mechanized treatments are allowed exists between the Pecos Wilderness and the patented boundaries of the three aforementioned land grants. While it is important to protect the area identified in C14x from any noxious activities, such as large-scale commercial mining and oil and gas drilling, choosing to manage the area as a wilderness as a means of curbing such activities would also put the communities reliant on the health of the forest and watershed at risk. Therefore it is recommended that the area be managed for the protection of the watershed and forest resources but not as a Wilderness. Protection of the watershed should include the exclusion of noxious uses such as large-scale mining and mineral extraction but not exclude the use of mechanized equipment. [52]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

- 1) NMDA Recommendation: Remove from further consideration. Below is a list of features and concerns that should exclude this polygon from further consideration in the Evaluation Phase. The reasons for excluding polygons with these specific features are found in the “Issues of Concern” section above. [3]
- 2) Evaluation Criteria Definition Matrix
 - a) Criteria 1: Apparent Naturalness
 - i) Wildfire Hazard Potential
 - (1) Most of this polygon has a rating of “high” and a few areas with a rating of “moderate.”
 - ii) Constructed Features
 - (1) The Trampas Recreation Area is a developed special interest management area in the western portion of this polygon.
 - (2) All the constructed features listed under Criteria 5 (related to constructed features for grazing allotments) detract from apparent naturalness and should be considered under Criteria 1, as well.
 - b) Criteria 2: Opportunities for Solitude or Unconfined Recreation
 - i) There are two roads within this polygon: Route No. UD4_2277 and Route No. UD4_2073. These roads will likely impact a visitor’s opportunity for solitude.
 - ii) There are many roads concentrated near the western and northern boundaries of the polygon. Even though these roads are outside the boundary of the polygon, they will likely impact a visitor’s opportunity for solitude.
 - c) Criteria 4: Unique and Outstanding Qualities
 - i) Important Watershed Features
 - (1) An unnamed seep or spring is within this polygon.
 - (2) The Rio Chiquito, Rio San Leonardo, and Rio de las Trampas perennial streams are within this polygon.
 - d) Criteria 5: Wilderness Characteristics Manageability
 - i) Impaired Surface Waters
 - (1) This polygon contains one impaired surface water that will need access in order to restore it: Rio Chiquito.
 - ii) Grazing

- (1) Allotments
 - (a) This polygon is partially within the Trampas grazing unit, which is utilized by 14 permittees.
- (2) Constructed Range Features
 - (a) Fences
 - (i) A grazing allotment fence bisects this polygon. Also, the southern boundary of this polygon is created with a grazing allotment fence. All these fences and gates must be regularly maintained by grazing permittees.
- iii) Roads and Trails
 - (1) There are two roads within this polygon: Route No. UD4_2277 and Route No. UD4_2073. There are also many roads near the western and northern boundaries of the polygon.
 - (2) The Trampas Lake (Trail No. 31) and the San Leonardo trail (Trail No. 30) are within this polygon.
- iv) Fire History
 - (1) The lightning-caused Dinner Fire burned between 10 – 99.9 acres in 1995 within this polygon.
 - (2) An unnamed lightning-caused fire burned between 0 – 0.25 acres in 1974 within this polygon.
- v) Management of Surrounding Lands
 - (1) The southern and eastern portions of this polygon are bordered by the Pecos Wilderness.
 - (2) The Trampas Recreation Area is partially within the western portion of this polygon.

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Luna-Coyote Evaluation Area

CNF Response: No comments specific to this area.

Rio Grande del Rancho Evaluation Area

Inventoried Area C13

This area, south of US 64 to FR 437, has outstanding natural beauty and unique wilderness characteristics. It meets the size criteria, and should be included in the inventory. This area does see quite a bit of mechanized use, and the cycling community should be consulted before any decisions are made that might restrict mechanized use. This area might be a good candidate for a Special Recreation Area, with a wilderness component. [33]

CNF Response: This area was determined not to have wilderness character. This comment may be most appropriate during the development of plan components.

US64 to FR 437, Camino Real Ranger District - 21,874 acres. This area has outstanding natural beauty and unique wilderness characteristics. It meets the size criteria and should be included in the inventory. [44]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Inventoried Area C15

This area, south of FR 437 to NM 518, has outstanding natural beauty and unique wilderness characteristics. It meets the size criteria, and should be included in the inventory. This area does see quite a bit of winter motorized use on US Hill to Garcia Park. This area also includes the Amole Cross Country Ski and Snowshoe Area, managed for non-mechanized use. The Forest Service should continue to manage this area for multiple use, including establishing other non-motorized areas. This area might be a good candidate for a Special Recreation Area, with a wilderness component. [33]

CNF Response: This area was determined not to have wilderness character. This comment may be most appropriate during the development of plan components.

FR437 to NM 518, Camino Real Ranger District - 61,618 acres, this area meets the size criteria and has outstanding natural beauty and unique wilderness characteristics. [44]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Taos Canyon Evaluation Area

Inventoried Area C10

N side is limited access (but area is of limited size) – may help prevent encroachment to Taos pueblo lands (though the pueblo may still want some vehicular access) [13]

CNF Response: This comment would have been appropriate during Analysis, however, this area was determined not to have wilderness character.

I'm glad to see this polygon included in the inventory. When you evaluate this area, please be sure to consider its adjacency to the Taos Pueblo's Blue Lake area, which is managed like wilderness, and then on to the Wheeler Peak and Columbine Hondo Wilderness Areas. Together, this stretch of wildland could be managed consistently all the way to Hwy 38. [35]

CNF Response: This comment would have been appropriate during Analysis, however, this area was determined not to have wilderness character.

Warm Springs-Miranda Evaluation Area

Evaluation Polygon C4b

Warm Springs timber sale covered much of this area from small piece of private land to the west. Heavily roaded, skid trails and the like. Also old battle ground which was logged over. May have some sacred issues to tribes especially Jicarilla Apache as the battle was between them and US Army. FR 606 is difficult to travel. Mine for stercorites in area. Several "pot" busts have taken place in the area. from the west is not easy. lands can be used to access area as existing roads come boundary fence and have used by FS to access this and then drive on roadbed existing in this area....Does not warrant designation. [4]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

We are opposed to this parcel being recommended as Wilderness in the Forest Plan. There is existing mountain bike access in this parcel on both gravel roads and trails, along with the potential to develop

further mountain bike accessible trails. Therefore we request that it is not included in your final RW classification for these reasons. [8]

CNF Response: This comment would have been appropriate during Analysis, however, this area was determined not to have wilderness character.

Warm Springs area of C4 appropriate – remote, limited access, adjacent to Picuris pueblo lands [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Land around C4 is also adjacent to Picuris and encompasses the “Warm Springs.” [13]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

C4 Camino Real area has important historic characteristics. Any management of this area should include management responsibilities under the National Trail System Act. [16]

This eastern corner of C4b has evidence of old logging activity that impacts its naturalness. Stumps, slash, 2 unmapped old roads that have been bermed, plus the two mapped roads that are still visible [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

This entire roaded area has evidence of past timber harvest/wood gathering- stumps and slash. While there has been revegetation and this area may appear natural to some despite many stumps, there are clear ecological impacts that change the way fire and insects would act in these areas. It would be very difficult to manage fire were this a wilderness due to dense oak, thick young ponderosa regrowth, especially since this is adjacent and downhill from Picuris Pueblo land. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

C4b - Warm Springs/Miranda - This area is immediately adjacent to the patented boundaries of the Cristóbal de La Serna Land Grant (See attached map Cristóbal de La Serna and Wilderness Character Area). The Cristóbal de La Serna Land Grant is an active land grant and is recognized by the New Mexico Land Grant Council as a being organized as a political subdivision of the State. The management emphasis for this area should be place on maintaining a healthy forest so as to reduce the risk of catastrophic wildfire. If the area is managed as a potential Wilderness it will limit the ability for the U.S. Forest Service to use mechanized equipment as a management option. This could hamper any efforts to do large-scale restoration for reducing the risk of catastrophic wildfire. An catastrophic wildfire originating in the area identified has the potential to spread to the adjacent Cristóbal de La Serna Land Grant on the North and the Picurís Pueblo on the South. This area should also be protected from any noxious uses such as large-scale mining operations or oil and gas drilling, etc., that could impact both surface and ground water quality however should not be precluded from allowing the use of mechanized equipment as a management tool for keeping the watershed healthy for downstream users, mitigating risk of catastrophic wildfire and as a means of accessing livestock and livestock improvements by permittees. [52]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

- 1) NMDA Recommendation: Remove from further consideration. Below is a list of features and concerns that should exclude this polygon from further consideration in the Evaluation Phase. The reasons for excluding polygons with these specific features are found in the “Issues of Concern” section above. [3]
- 2) Evaluation Criteria Definition Matrix
 - a) Criteria 1: Apparent naturalness
 - i) Wildfire Hazard Potential
 - (1) Most of this polygon has a rating of “high” and “moderate.”
 - b) Criteria 2: Opportunities for Solitude and Unconfined Recreation
 - i) There are several roads within this polygon that will certainly impact a visitor’s opportunity for solitude: Route No. 606B, Route No. 720D2, Route No. UD4_1193, Route No. 720D, Route No. UD4_1196, Route No. UD4_1195, Route No. 720D1, Route No. UD4_1194, Route No. 720, Route No. 720B, Route No. UD4_1192, Route No. UD4_1201, Route No. UD4_1203, Route No. UD4_1200, Route No. 720A, Route No. UD4_1197, Route No. UD4_1202, Route No. UD4_1199, Route No. UD4_2024, Route No. UD4_2023, and Route No. UD4_2022.
 - ii) In addition to the roads located within the polygon, there are also two roads that create the boundary of the polygon that will likely impact a visitor’s opportunity for solitude: Route No. 606 and Route No. 469.
 - iii) All the constructed features listed under Criteria 5 (related to constructed features for grazing allotments) detract from apparent naturalness and should be considered under Criteria 1, as well.
 - c) Criteria 4: Unique and Outstanding Qualities
 - i) Critical Habitat
 - (1) There is a known northern goshawk (*Accipiter gentilis*) area within this polygon.
 - ii) Important Watershed Features
 - (1) There are five unnamed seeps or springs within this polygon.
 - (2) There are five perennial streams within this polygon: the Tierra Amarilla Canyon Stream, the Picuris Canyon Stream, the Agua Caliente Canyon Stream, the Warm Springs Stream, and the Hondo Canyon Stream.
 - d) Criteria 5: Wilderness Characteristics Manageability
 - i) Grazing
 - (1) Allotments
 - (a) This polygon is entirely within the Rio Pueblo grazing unit, which is utilized by four permittees.
 - (b) Also within this polygon are three grazing pastures: the Telephone pasture, the Agua Caliente pasture, and the Hondo Canyon pasture.
 - (2) Constructed Range Features
 - (a) Fences
 - (i) The southern boundary and part of the southeastern boundary of this polygon is created by grazing allotment boundary fences.
 - ii) Fire History
 - (1) Four unnamed lightning-caused fires burned within this polygon. One fire burned between 0.26 – 9.9 acres in 1994, one burned between 0.26 – 9.9 acres in 1985, one burned between 0 – 0.25 acres in 1974, and one burned between 0 – 0.25 acres in 1977.
 - iii) Roads and Trails
 - (1) There are several roads within this polygon: Route No. 606B, Route No. 720D2, Route No. UD4_1193, Route No. 720D, Route No. UD4_1196, Route No. UD4_1195, Route No. 720D1, Route No. UD4_1194, Route No. 720, Route No. 720B, Route No. UD4_1192, Route No. UD4_1201, Route No. UD4_1203, Route No. UD4_1200, Route No. 720A, Route No. UD4_1197, Route No. UD4_1202, Route No. UD4_1199, Route No. UD4_2024, Route No. UD4_2023, and Route No. UD4_2022.

- (2) In addition to the roads located within the polygon, there are also two roads that create the boundary of the polygon: Route No. 606 and Route No. 469.
- iv) Management of Surrounding Lands
- (1) This polygon is adjacent to the Cristoval de la Serna Land Grant.
 - (2) The southern boundary of this polygon borders the Picuris Pueblo.
 - (3) A portion of the northwestern boundary of this polygon is bordered by BLM land.
 - (4) Two portions of the northwestern boundary of this polygon is bordered by New Mexico State Land Office land. [3]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Tres Piedras Ranger District

Tres Piedras North Evaluation Area

The proposed areas were considered in the original proposals for wilderness area and dropped for legitimate reasons. The revisiting of these areas indicates a desire to bypass the original thought process. For example during the discussion related to the Cruces Basin Wilderness the additional areas now proposed were eliminated due to recreational use within these areas including track roads accessing hunting camps. The area to the east and north of the Cruces Basin Wilderness had portions used as fuelwood areas, had track roads throughout much of the area, and contained some research areas (aspen). These areas were precluded in the original proposal for valid reasons. [4]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Access to Riparian areas, creeks, ojos, Tributaries to Rio Brazos limit acequias Norteñas ability to protect and be able to clean out any Blockages which may occur and may interfere with acequia practices. Mayordomo access for Bank erosion, blockages etc... The flow from watershed is very important to parciantes in acequias. If fire occurs in watershed, which can happen soon especially up on Cumbres Pass Area because of Bark beetle. Acequias are impacted because of access to address areas that have been burned. [6]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

...we were surprised to see that the most of the land in the San Antonio --- Cruces Basin watershed dropped off. This is a vast area of land that is overwhelmingly natural and undeveloped. We strongly disagree with the statement in the Cruces Basin and San Antonio Mountain evaluation determination that this area “offers limited opportunities for solitude or unconfined recreation, because this area is used by the communities of Antonito, Taos and Tres Piedras”. These are all relatively small communities and the Cruces Basin –San Antonio Watershed evaluated area is a large expansive area that during most times of the year does not experience many visitors. While during the hunting season there is an increase in use in the area, even during these peaks times there are still many opportunities for both primitive recreation and solitude. Even the hike up San Antonio Mountain, which is located closer to main roads and development than the rest of the area, offers amazing opportunities for quiet and solitude. The sheer vastness of this landscape lends itself to a feeling of naturalness and solitude. This is true for even for places where you can see signs of human

life far in the distance. Or perhaps one could argue, that it is areas where you can see the tiny specks of our human mark on the world that give us even more a sense of solitude. Who has not felt the tiny nature of our individual existence and the solitude of being so far away from the rest of humanity while standing on the top of mountaintop and looking down far below at distant communities moving about their everyday lives. In addition, the size, shape, and location of the lands in this area assures manageability because the majority of the area is isolated from population centers, with limited access and very few encumbrances. The area also provides a crucial connectivity to the larger area's wildlife. [22]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

We completely disagree with the findings in the Cruces Basin-San Antonio Watershed evaluation, which claim that these areas do not have wilderness character due to their lacking apparent naturalness. We are particularly concerned with the evaluation as applied to inventory polygons W27 and W29. Our concerns with this evaluation have been validated by the field inventory work that we conducted over the past two field seasons. Our field inventory found overwhelming evidence of apparent naturalness and wilderness character.... [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The Cruces Basin-San Antonio Watershed narrative mentions the noise from a train as impacting solitude. First, the train is located in the far northern reaches of the evaluation area and the sound from the whistle does not travel so far as to warrant an outside sound that is so pervasive as to eliminate solitude throughout this area. Second, those individuals who surveyed for wilderness character in inventory polygons W27 and W29 were in the field for long durations of time over several days and never once heard a train whistle, much less one that was so pervasive that it degraded solitude. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

...the narrative for Cruces Basin-San Antonio Watershed evaluation area mentions the use of and the need for motorized access and mechanized equipment for wildlife improvement activities. Consideration of these sorts of management trade-offs are outside the scope of the wilderness evaluation. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The narrative for the Cruces Basin-San Antonio Watershed evaluation area states: "Various types of infrastructure scattered throughout the area detract from the apparent naturalness as well, including exclosures, fish barriers, spring developments, trick tanks, stock tanks, fish barriers, and corrals." There is no discussion of how these improvements would appear to the average visitor. There is no discussion about the degree to which these improvements are degrading the area's naturalness. It is particularly important to consider these improvements in the context of the entire evaluation area, which by our estimates is about 120,000 acres. Further, our field survey of inventory polygons W27 and W29 did identify range improvements, including those listed in the narrative, and appendix 3 includes photographs that document these improvements. We entirely disagree with the Forest Service, however, that these improvements are not substantially unnoticeable. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Notwithstanding the legislative history of the Wilderness Act, the 1995 congressional direction on grazing in wilderness areas, and the Chapter 70 direction, the Carson seems to have inappropriately down-rated lands in the Cruces Basin-San Antonio Watershed area from the evaluation based on the presence of and the need to maintain range improvements. Our concerns with the Carson's consideration of range improvements when evaluating apparent naturalness have been validated by our field survey of inventory polygons W27 and W29, which found overwhelming evidence of apparent naturalness and wilderness character. We also disagree with the Carson considering grazing as a manageability consideration. We are extremely concerned that this limited example is representative of more widespread misapplication of the apparent naturalness and manageability criteria throughout the wilderness evaluation narratives. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Once again, we reference the narrative for the Cruces Basin-San Antonio Watershed as an example, which briefly notes that most of the area lacks naturalness because closed roads detract from the natural landscape. First, the presence of closed roads – which do not disqualify an area from the wilderness inventory – is irrelevant absent an evaluation of whether those roads make the area appear unnatural to the average visitor (which the narrative for the Cruces Basin-San Antonio Watershed lacks). Second, relative to the vastness of the Cruces Basin-San Antonio Watershed evaluation area, which is about 120,000 acres, there are very few roads. Further, of the closed roads that do exist in wilderness inventory polygon W29 and W27, most are in the process of passive restoration and/or are hardly noticeable, as you will see documented in the photos that we provide as Appendix 3. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

An especially inadequate analysis for wilderness character is that for the Cruces Basin and San Antonio Watershed. The fact that there is significant use by vehicles on the few roads should not impact the wilderness character of large, inaccessible areas between these roads. The closed roads, and even some of the open roads, that we have traveled, are not intrusive. Many are returning to a natural state, and would do so if efforts were made to reduce what little travel currently occurs on them. The headwaters of the upper Rio San Antonio is spectacular wild country but you determine it to not meet the standard of “apparent naturalness” because the waters of the stream are listed as “impaired.” Traveling through this remarkable area one does not experience impairment. The water can be treated, and it certainly does not effect the experience of naturalness one enjoys in this place. [11]

Notwithstanding the legislative history of the Wilderness Act, the 1995 congressional direction on grazing in wilderness areas, and Chapter 70 direction, the Carson seems to have inappropriately down-rated lands in the Cruces Basin-San Antonio Watershed area from the evaluation based on the presence of and the need to maintain range improvements none of which, except mechanized use, which could be discontinued, would exempt these lands for Wilderness protection. [11]

As to your decision that because there is summer use by ATVs and winter use by snowmobiles and therefore no opportunity for solitude and unconfined recreation, certainly there are areas around the road system where wilderness character would be impacted by these activities. But between these roads are large areas from which vehicles could and should be excluded (and probably are by terrain) and which would allow for solitude and unconfined recreation. We believe the decision that large areas of the Cruces Basin and San Antonio watershed do not meet criteria for wilderness character should be reconsidered. [11]

San Antonio Mountain certainly qualifies as an outstanding geological and ecological feature. You seem to have eliminated it from your inventory of wilderness character because of the communication towers on its summit. We recently circumnavigated the mountain, and noted that the towers were only intrusive from the east slopes of the mountain. Northern, western, and southern sides of the mountain, which looked to us wild

and minimally impacted by human activity, were not impacted at all by the towers. There must be at least 7139 acres on the mountain that have wilderness character. Because of its size, the unique wilderness character of its sweeping slopes, unique ecological values with meadows and aspen groves inside the caldera, and wildlife and archaeological values, we think this should be a prime candidate for wilderness protection. As noted above, the impact of distant sights and sounds on areas that otherwise have wilderness character has long been discarded as a reason to eliminate areas for consideration as wilderness. We think the sides of San Antonio Mountain as noted should be reconsidered as having outstanding wilderness character. [11]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The Rio Tusas lower San Antonio area. Should not be considered due to the wood harvest. The private land that is checker boarded throughout. Also the trees have been harvested in the past and they are in severe need of being treated again. [14]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

W23, W24 El Rito Canyon ... Stone Canyon ... ongoing large-scale restoration projects [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

W23, W24 El Rito to Canyon (?): large scale restoration ... camping and hunting [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

We determined that there is a total of 61,993 acres of land in the Greater Cruces Basin area (beyond the Cruces Basin) that have wilderness character (including the areas CNF identified). [52]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The CNF Draft Wilderness Evaluation states, "Most of the Cruces Basin and San Antonio Watershed evaluated area lacks apparent naturalness because of impacts from past thinning projects and closed roads that detract from the natural landscape." [52]

We did not notice any past thinning projects. These would not be apparent to your average visitor, and past thinning projects do not detract from the naturalness of this area. There are clear cuts on San Antonio Mountain visible on aerial maps such as this one. However recently we had a conversation with a local federal land manager who visited the top of San Antonio Mountain and he said he thought the large grass openings on top were natural and was surprised to learn later that the area was a clear cut. [52]

So even a visitor to the top of San Antonio Mountain would most likely perceive naturalness here. [52]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The CNF Draft Wilderness Evaluation states, "Various types of infrastructure scattered throughout the area detract from the apparent naturalness as well, including exclosures, fish barriers, spring developments, trick

tanks, stock tanks, and corrals." In our survey we did not observe any of the above except for earthen stock tanks and one small rustic wooden horse corral. The stock tanks blend in naturally as they are earthen and do not detract from the naturalness of the area. Most of the stock tanks and corral are within 200 feet of the main travel roads and occur in a buffer from what may become wilderness. The areas we surveyed appeared natural. [52]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

We are pleased that CNF identified sections W17f, W17k, and W29c as having wilderness character and we agree. However we cannot understand how you can exclude thousands of other acres which we and The Wilderness Society document as having naturalness. During our survey we were impressed with the vast expanse of natural wild vistas. The areas we have identified on the map are landscape wilderness treasures with beautiful naturalness. [52]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The CNF Draft Wilderness Evaluation states, "Most of the Cruces and San Antonio Watershed evaluated area offers limited opportunities for solitude or unconfined recreation, because this area is used by the communities of Antonio, Taos and Tres Piedras." [52]

This is an inappropriate statement. Antonio, Taos, and Tres Piedras are low population communities and few of the citizens visit this area. [52]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The CNF Draft Wilderness Evaluation states, " It is also a destination point for people visiting the Carson National Forest from outside communities which contributes to high use numbers of the area." [52]

We conducted our survey in the height of the summer on a weekend during perfect weather. In two days of surveying, we encountered a total of seven vehicles, two of which were government vehicles carrying Forest Service personnel. The following Tuesday in forty-five miles of driving we only encountered three vehicles and again, one was a Forest Service vehicle. [52]

This is not to mention the thousand of acres of wild lands away from public roads that are roadless and trail-less. Other times that we have visited this area recreationally we have encountered few people on public roads. Human use of this area is minimal. Human visitors would have exceptional opportunities for primitive recreation and solitude. [52]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The CNF Draft Wilderness Evaluation states, "In addition the sound impact from snowmobiling in the winter and the Cumbres and Toltec Train in the summer can be pervasive throughout most of this area ... to impact a sense of solitude." [52]

You cannot hear the Cumbres Toltec Train from the areas we identified. It is absolutely not a pervasive sound in the area. [52]

Snowmobile use would need to be managed to public roads and appropriate areas - an educational endeavor and management responsibility of CNF. [52]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The CNF Draft Wilderness Evaluation states, " It would be difficult to manage most of the Cruces Basin and San Antonio Watershed to preserve wilderness character, because of current multi-year and multi-agency approved restoration projects... because of required motorized access and use of mechanized equipment ... additionally the ... area already has established use of ATVs and would instigate vehicle encroachment. [52]

With regard to the multi-agency restoration project, only a small percentage of that area occurs in the areas we highlight having wilderness character as depicted on our map. If these areas of wilderness character are selected for a wilderness designation, the process would likely take many years and such a campaign would only begin after this plan is completed, itself a multi-year process. [52]

In this large interim period, restoration activities could be completed and would most likely enhance the wilderness character of the area. During our survey we encountered a CNF official who was surveying the area to try to come up with signage to deal with ongoing ATV off-road encroachment so it is apparent that CNF already has management concerns here. [52]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Based on the data collected by two independent citizen groups however, we request that CNF revisit their wilderness evaluation assessment for the Cruces Basin/San Antonio area. [52]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The area identified in the evaluation is much smaller than I thought it would be since so much of that area would lend itself to a wilderness designation. NMWF disagrees with the finding that these lands do not have wilderness Character. [18]

- The area is overwhelmingly natural and underdeveloped, primitive and untrammeled. It is vast and acreage is ample to meet the criteria for wilderness consideration.
- Primitive Recreation Outstanding opportunities for backcountry hunting and fishing, backpacking, hiking, and the area has high quality habitat for wildlife.
- The Continental Divide Trail cuts through the far western portion of this area and is one of many outstanding opportunities for hiking.
- Solitude
- Vast, open, scenic vistas are common throughout the area, and the gentle topography lends this area to world class hunting opportunities.
- Relative to the rest of the forest, the USFS designated very few roads and trails as open to public motorized use in the travel planning process in this landscape. The lack of designated motorized routes in combination with the area's remoteness from any population centers have left it largely undiscovered, untrammeled and pristine providing excellent opportunities for solitude.
- Manageability
- The size and shape of the lands in this area assures manageability. The majority of the area is isolated from population centers, with limited access and very few encumbrances. Boundaries can be easily adjusted to exclude all private lands within the area. There are no extrusions or bottlenecks. We feel reconsideration of this area is appropriate and NMWF would appreciate this area to get a well deserved second look. [18]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Wxs 723 ADD and wxs 710 ADD are riddled with logging roads and are used extensively by hunters and wood gatherers in pickups and ATVs. [14]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

In regards to wilderness recommendation for the Tres Piedras district, I suggest two areas not included in your inventory: #1 Parts of the Tony Marquez trail including the very upper Tusas and the areas west of Forest Rd. 80 which bisects Valle Grande, and extending all the way to the Private on the Rio Nutritas, and including the upper reaches (timberline) of the Canada Tio Grande, Rio Nutritas, and Rio Tusas, and #2 San Antonio canyon upstream from the small Private piece and including Rio Lagunitas canyon all the way to Rd. 87 which borders Cruces Basin Wilderness. Both of these areas are now “roadless” but the rule is ignored particularly in hunting season. In my opinion, both areas are as beautiful and wild as anything in the Valle Vidal and in Cruces Basin. [39]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Defenders of Wildlife disagrees that these lands do not have wilderness character. The area is important for elk, deer, bear, cutthroat trout, and lynx. NMDGF identified lands in this area as high priority crucial habitat. The unit is overwhelmingly natural and undeveloped. The lands are crucial for landscape connectivity between CO and NM. Recommending this area will help ensure the area’s important connectivity. The area’s primitive and untrammled character dominates. The occasional sign of human activity is unnoticeable due to the vastness of the landscape, topography, and natural reclamation. Opportunities for primitive recreation are excellent in the area given its natural and rugged character, high-quality habitat, remarkable views, and size. Few roads and trails as open to public motorized use and in combination with the area’s remoteness have left it largely untrammled and pristine providing excellent opportunities for solitude. The size and shape of the lands assures manageability. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

[Reply] The FS mentions in its evaluation write up that this area does not appear natural because of the presence of developed rec facilities, like campgrounds. True, campgrounds and other facilities are located nearby but the FS could easily adjust the boundary to exclude these parcels of land thereby retaining the wilderness character for the remaining 20,000+ acres. It's shocking the FS didn't attempt to apply such an easy solution to a small problem but instead chose the nuclear option of disqualifying the entire area. [42]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The greater Cruces Basin - San Antonio Watershed area has tremendous wilderness potential and is a crucial connector for wildlife corridors between Colorado and New Mexico and the Rio - Grande del Norte Monument and the Cruces Basin. The landscape is minimally altered, is sufficiently large and otherwise qualified for wilderness. This area should be given priority status for wilderness designation. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I disagree with the Forest Service findings that inventory polygons W27 and W29 do not have solitude. I've been to this area several times. It's a vast landscape and I didn't see anyone driving the roads, much less exploring the wildlands off of the roads. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

This area has outstanding opportunities for primitive and unconfined recreation. Opportunities to hunt, camp, backpack, explore, view wildlife, star gaze, etc. abound. The FS didn't even consider this in their evaluation write up. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The FS says that areas W27 and W29 don't appear natural because of structures scattered about related to grazing. Yes, some stock ponds, tanks and other structures exist, they blend into the landscape and are totally unnoticeable relative to the immense size of this landscape. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The FS said in its wilderness evaluation that it can't manage this area to maintain wilderness character because of a restoration project (presumably the Rio Tusas-Lower San Antonio project) that is still being analyzed. First, the FS isn't actually proposing much vegetation manipulation in W27 and W29 and, much of the treatment is prescribed burns which likely isn't incompatible with recommending the area for wilderness. Second, to disqualify this area from being considered wilderness before the project record is signed is pre-decisional (you're presuming the project will actually be approved), which is against the law. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The FS says this area lacks solitude because some nearby communities use it. I disagree. 1) There aren't any communities nearby that have enough people to spoil the solitude present in this area. 2) When you get away from the open roads, it's easy to experience solitude. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

We believe that the Carson National Forest Wilderness Evaluation has grossly underestimated land acreage for wilderness recommendation near the existing Cruces Basin Wilderness. We believe there is closer to forty thousand acres of wilderness quality lands in the northern reaches of the Tres Piedras Range District. These lands are vast, remote, and undeveloped. There are few roads and motorized trails open for public use in the area. The open habitat of broad grasslands interspersed by patches of forest make it relatively safe from the threat of catastrophic wildfire and thus not an area where intense fire prevention is needed relative to the rest of the Carson National Forest. There are no obvious human constructed structures in this area. Any developments related to grazing are earthen and substantially unnoticeable. Both New Mexico Game and Fish Department and the University of New Mexico have identified this area as a critical wildlife corridor from southern Colorado down through northern New Mexico: Recommending these lands for wilderness would ensure that this corridor remains undisturbed for mule deer, antelope, elk, mountain lion, lynx and other wild mammals that move through the region in Rio Arriba and Taos Counties and beyond. Administrative protection of this important wildlife area will help ensure healthy and resilient wildlife populations for our area into the future. [60]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Due to significant discrepancies with other independent surveys, we request that you reconsider your draft wilderness evaluation in the Carson Forest Plan Revision Process.

We believe that the Carson National Forest Wilderness Evaluation has grossly underestimated land acreage for wilderness recommendation near the existing Cruces Basin Wilderness. Your draft evaluation identifies just over six thousand five hundred acres. Two highly respected conservation organizations, The Wilderness Society and Rivers & Birds, conducted independent surveys with photo documentation that both identify close to sixty thousand acres of wilderness quality lands in the northern reaches of the Tres Piedras Ranger District. These lands are vast, remote, and undeveloped. There are few roads and motorized trails open for public use in the area. The open habitat of broad grasslands interspersed by patches of forest make it relatively safe from the threat of catastrophic wildfire and thus not an area where intense fire prevention is needed relative to the rest of the Carson National Forest. There are no obvious human constructed structures in this area. Any developments related to grazing are earthen and substantially unnoticeable. Both New Mexico Game and Fish Department and the University of New Mexico have identified this area as a critical wildlife corridor from southern Colorado down through northern New Mexico. Recommending these lands for wilderness would ensure that this area remains undisturbed for mule deer, antelope, elk, mountain lion, lynx and other wild mammals that move through the region in Rio Arriba and Taos Counties and beyond.

Administrative protection of this important wildlife area will help ensure healthy and resilient wildlife populations for our area into the future.

Taos Pueblo is in full support of the Carson National Forests' wilderness evaluation for lands north of the existing Pecos Wilderness and for wilderness acreage within the Valle Vidal area. These lands would make excellent wilderness additions because they are wild, untrammeled, and offer excellent habitat for fish and wildlife, including bighorn sheep and cutthroat trout.

Relative to the other large western states, New Mexico has exponentially fewer designated Wilderness areas. Meanwhile, as roads, transmission lines, cell towers, mining proposals, energy extraction, and other development continue to overtake our last remaining untouched wild landscapes, this current Carson Forest Plan revision is most likely the last opportunity to promote lands for future wilderness designation. Designated wilderness areas that we do have in Taos County attract visitors from around the world and are an economic stimulus for Taos County as well as important watersheds for our community and habitat for our regional wildlife.

We ask now that you consider the information in this letter and revisit your evaluation of lands in the Cruces/San Antonio area for wilderness recommendation in the Forest Plan to recommend these lands for wilderness in at least one alternative in the draft environmental impact statement. [61]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

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There are no obvious human constructed structures in this area. Any developments related to grazing are earthen and substantially unnoticeable. Both New Mexico Game and Fish Department and the University of New Mexico have identified this area as a critical wildlife corridor from southern Colorado down through northern New Mexico. Recommending these lands for wilderness would ensure that this area remains undisturbed for mule deer, antelope, elk, mountain lion, lynx and other wild mammals that move through the region in Rio Arriba and Taos Counties and beyond. Administrative protection of this important wild life area will help ensure healthy and resilient wild life population s for our area into the future....

We ask now that you consider the information in this letter and revisit your evaluation of lands in the Cruces/San Antonio area for wilderness recommendation in the Forest Plan to recommend these lands for wilderness in at least one alternative in the draft environmental impact statement. [62]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

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We ask now that you consider the information in this letter and revisit your evaluation of lands in the Cruces/San Antonio area for wilderness recommendation in the Forest Plan to recommend these lands for wilderness in at least one alternative in the draft environmental impact statement. [63]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Due to significant discrepancies with other independent surveys, we request that you reconsider your draft wilderness evaluation in the Carson Forest Plan Revision Process.

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There are few roads and motorized trails open for public use in the area. The open habitat of broad grasslands interspersed by patches of forest make it relatively safe from the threat of catastrophic wildfire and thus not an area where intense fire prevention is needed relative to the rest of the Carson National Forest. There are no obvious human constructed structures in this area. Any developments related to grazing are earthen and substantially unnoticeable. Both New Mexico Game and Fish Department and the University of New Mexico have identified this area as a critical wildlife corridor from southern Colorado down through northern New Mexico.

Recommending these lands for wilderness would ensure that this area remains undisturbed for mule deer, antelope, elk, mountain lion, lynx and other wild mammals that move through the region in Rio Arriba and Taos Counties and beyond....

We ask now that you consider the information in this letter and revisit your evaluation of lands in the Cruces/San Antonio area for wilderness recommendation in the Forest Plan to recommend these lands for wilderness in at least one alternative in the draft environmental impact statement. [64]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Inventoried Polygon Wxs701ADD

The Rio Grande NF (RGNF) will soon release its preliminary wilderness inventory as part of its forest plan revision. It's likely that NFS lands directly north of here will be identified in the RGNF wilderness inventory. If that happens, this block of land, and perhaps others along the CO-NM border, would be part of an area that is larger than 5,000 acres. We recommend that the Carson revisit these parcels when the RGNF releases its inventory to make sure there's consistency across state lines. This would ensure compliance with the USFS's planning directives. [35]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

I disagree with the USFS's finding that these lands do not have wilderness character. [46]

*The unit is overwhelmingly natural and undeveloped. Any scattered imprints of man are substantially unnoticeable, especially relative to the vastness of the landscape.

*The lands are crucial for landscape connectivity as wildlife between So. Colorado and No. New Mexico. Recommending this area for wilderness will help maintain the area's important role for connectivity. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Inventoried Polygon Wxs710ADD

Adjacent land in Colorado makes this area larger than 5000 ac of continuous roadless. It should be added to the inventory and evaluated. [35]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Inventoried Polygon W11

Urge you to consider wilderness recommendation for San Antonio Mountain. [33]

CNF Response: This area was determined not to have wilderness character.

This area meets the size requirement and has unique wilderness characteristics and scenic values. Part of this area has been managed as a Winter Wildlife Refuge for migrating herds of Rocky Mountain Elk and Pronghorn Antelope. San Antonio Mountain (11,908') is the tallest free-standing mountain in the continental US. It is the tallest of the "Cerros", a solitary volcanic peak rising out of the desert floor. There is a crater (caldera) at the summit, with unique alpine grassland ecology. This area contains the renowned SAM Cave, (one of) the oldest lava tube(s) in North America, with some of the oldest mammalian fossils ever found, and many other important archaeological sites. [33]

This area should be included in the Carson's Wilderness Inventory, and managed to protect its unique wilderness character, and it's ecological and archeological values. This area should seriously be considered for Wilderness Designatio/or inclusion in either the Cerros del Norte Conservation Act or the Rio Grande del Norte National Monument. [33]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. Land transfers are outside of the scope of forest plan revision.

cell phone towers / close to highway and heavily used roads / easy access [14]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The CNF Draft Wilderness Evaluation states, " San Antonio Mountain is a designated electronic site that supports multiple communications towers and antennas ... These structures are visually apparent from within this evaluated area." These electronic sites are not visually apparent from the areas of wilderness character we have identified on this map ... with the exception of a small portion on top of San Antonio Mountain. They do not affect the naturalness of the area. [52]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

This area meets the size requirement and should be included in the Carson National Forest's wilderness inventory. Because of its size, unique wilderness character, unique ecological and archaeological values, this area should be given wilderness protection. [44]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Extent of roadless area on adjacent BLM land should be depicted on map for analysis of Wilderness character. [35]

[Management of adjacent lands was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

While I realize that San Antonio Mountain has a couple of radio towers on the top, I believe the mountain has wilderness characteristics and is surrounded both by the BLM Wilderness Study area to the north as well as additional inventoried BLM roadless areas to the south and northeast. BLM is also going through a planning process and USFS lands and BLM roadless lands around San Antonio Mountain could combine to create a large swath of land with wilderness characteristics. Has the USFS been in contact with BLM to discuss their plans for the monument? San Antonio mountain with its sweeping vistas and vast landscape offers good opportunities for solitude and primitive recreation. Perhaps the radio towers could be cherry stemmed. Picture is view towards Ute Mountain from halfway up San Antonio Mtn. [46]

[Management of adjacent lands and other comments were considered during Evaluation and are addressed in the documentation of the Evaluation process and rational.

Inventoried Polygon W17

Allotment we need to use back hoe to clean stock tank. We have the Toltec train goes right through it. we have a lot of HTV use. The railroad track crew. There camping ... fishing [14]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Inventoried Polygon W27

The CNF Draft Wilderness Evaluation states, " The New Mexico State Environment Department lists the San Antonio waters as impaired." This does not affect the natural appearance of the area. Your average visitor looking down on the landscape would not know this. They would look down on a meandering narrow creek amongst the beautiful wild hill and dale of the Greater Cruces Basin area where the creek flows. [52]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

This isn't the exact location where this photo was taken but it's in the general vicinity. This area is extremely remote and very wild. The gentle topography instills a sense of peace. Outstanding opportunities for solitude and primitive recreation. This whole area has a high degree of wilderness character. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

To the south of the Cruces Basin Wilderness is a 20,879 acre unit of wilderness quality lands that contain the headwaters of the Rio San Antonio. Throughout the unit one will find deep canyons that have been carved by high elevation streams through what is essentially an extension of the San Juan Mountains into New Mexico. The area is a transitional zone where the semi-arid plains and forests of New Mexico – sagebrush and chamisa, pinon-juniper, and ponderosa pine – gradually phase into the high-country parklands and spruce-fir and aspen forests of Colorado. [10]

The most prominent topographical feature is Olguin Mesa. It covers over 1,000 acres and gently slopes downward to the east before dropping off steeply in all directions. A prominence on its west side reaches over 10,440'. To the northeast, Banco Julian tops out at 10,413', and though it has mesa-like steps up to its prominence, it is not a mesa like Olguin Mesa is. [10]

Though small portions of each fall outside the unit, almost all of the headwaters of Lagunitas Creek, Rio San

Antonio, and Rio Nutrias are contained in it. Lagunitas Creek joins Rio San Antonio as it wraps around Oguin Mesa, going between it and Banco Julian. The ecological health of the Rio San Antonio is improving, particularly in the stretch above the Rio Nutrias, as beaver move in and do what they do best: create wetlands and raise the water table with their dams. See Attachment A for a detailed description of the proposal area's boundary. [10]

APPARENT NATURALNESS

The unit is overwhelmingly natural. It is part of a very large, undeveloped landscape in Northern New Mexico and Southern Colorado. Open grasslands are the dominate ecosystem. Ponderosa pine, much of which is old growth, climb the hillsides. Riparian habitats, including wetlands, wet meadows, and streams are all represented. The area enjoys an abundance of wildlife. The type of habitat found in the unit sustains healthy populations of game species such as elk, antelope, and mule deer, and predator species such as mountain lion and black bear. [10]

The area appears predominantly natural and undeveloped, with the scattered imprints of man substantially unnoticeable. There are very few roads open to public motorized use in the northern reaches of the Tres Piedras Ranger District, including lands within this unit. Any open roads shown on the MVUM either serve as boundary roads to the area or are cherry-stemmed. Most of the old closed roads and unauthorized routes in the area that are unavailable for public motorized travel have faded back into the landscape from lack of use. Scars on the landscape from logging and mining are substantially unnoticeable. [10]

Only improvements related to grazing are present in the area and even these are hardly noticeable. Their condition, materials from which they are constructed, and location on the landscape relative to surrounding topography render these improvements undetectable, retaining the area's untrammled character. The unit has numerous built ponds in its backcountry. Based on aerial photographs and site visits, many are still functional. For most, it is hard to discern the location of the road that is used to access the pond site. Relative to the area as a whole – which is a vast and remote landscape - existing grazing improvements are certainly unnoticeable. [10]

In summary, the area's primitive and untrammled character dominates the landscape. The area does not have any permanent structures, and the occasional signs of human activity, such as abandoned routes, stock ponds and tanks, and fencing, are substantially unnoticeable due to the vastness of the landscape, vegetative cover and topography, and natural reclamation. Photographs of these human imprints, alongside photographs of wilderness character, are provided in Appendix 3. [10]

OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR PRIMITIVE AND UNCONFINED RECREATION

Opportunities for hiking, camping, backpacking, horseback-riding, hunting, and other forms of primitive recreation are excellent in the area given its natural and rugged character, high-quality habitat, remarkable views, and size. Unconfined recreation is plentiful in the grassy, rolling landscape. The management of the greater landscape to benefit wildlife, particularly elk, the abundance of beaver dams, and the overall ecological quality of the landscape make this is a prime area for wildlife viewing. Many of the streams in the region are popular among anglers. The Continental Divide Trail cuts through the western portion of the unit and is just one of many outstanding opportunities for hiking in the unit. The Cruces Basin Wilderness is a popular hunting destination. Recommending additional lands for wilderness in the vicinity could alleviate pressures put on the Cruces Basin Wilderness. [10]

Vast, open, scenic vistas are common throughout the area offering complete solitude. The gentle topography instills a sense of peace and quietude. Relative to the rest of the forest, the Carson designated very few roads and trails as open to public motorized use in the travel planning process in this landscape. This lack of designated open roads and motorized trails in combination with the area's remoteness from any population

centers have left the area largely undiscovered, untrammled and pristine providing excellent opportunities for solitude. [10]

SUPPLEMENTAL VALUES

The New Mexico Natural Heritage Program recently released a report that documents opportunities to provide for landscape connectivity in the Upper Rio Grande Landscape. The Heritage Program aggregated all of the connectivity and wildlife movement related data in this landscape in an attempt to identify “hotbeds” for connectivity. The data is from a variety of sources including Colorado Parks and Wildlife and New Mexico Department of Game and Fish. The Heritage Program’s report found that an important area for landscape connectivity exists from the South San Juan Wilderness in Colorado to the Cruces Basin Wilderness and then moving east to the BLM’s San Antonio WSA/LWC complex in the Rio Grande del Norte National Monument. The report calls this area the Northern Taos Plateau Wildlife Movement Focal Area. Specifically, the lands that comprise the Rio San Antonio Headwaters proposal area play a critical role in terms of providing landscape connectivity. The Heritage Program’s report is provided as Appendix 4 to this letter. [10]

Lands within the area received the second highest score in terms of their crucial habitat ranking under the NMDGF’s Crucial Habitat Assessment Tool. (See map in Attachment B.) The NMDGF identified the area as winter habitat for elk. (See map in Attachment B.) The lush meadows and running water found year-round in the area provide important habitat for numerous species. [10]

The Carson National Forest hosts numerous ecosystem types that are poorly-represented in the National Wilderness Preservation System (NWPS). We calculated the proportion (%) of each wilderness inventory area that is composed of ecosystems inadequately represented in the NWPS. See Appendix 1. Based on this analysis we found that 59.7% of inventory unit W27 has only 5-9.9% representation federally and 25% of W27 has only 10-19.9% representation federally. Together 85.5% of the unit is comprised of ecosystem types that have less than 20% representation in the NWPS. See Appendix 1, Tables 1-3 for more information about the ecosystem types found in unit W29, and their representation in the NWPS. [10]

MANAGEABILITY

The size and shape of the proposed Rio San Antonio Headwaters Recommended Wilderness Area assures manageability. The majority of the area is isolated from areas of human activity, with limited access and very few encumbrances. The area does not have motorized activity occurring within its proposed boundaries. There is one private inholding within the area, and we’ve proposed a cherry stem to access the property. The inholding and cherry stem would not affect the ability of the agency to manage the area to maintain its wilderness character. There are no extrusions or bottlenecks. Proposed boundaries follow designated roads, forest service administrative boundaries, and topographic features. The area is near the Cruces Basin Wilderness which could offer consistency in land management. According to LR 2000 (as of April 22, 2016), there are no active or pending mining claims in the area. [10]

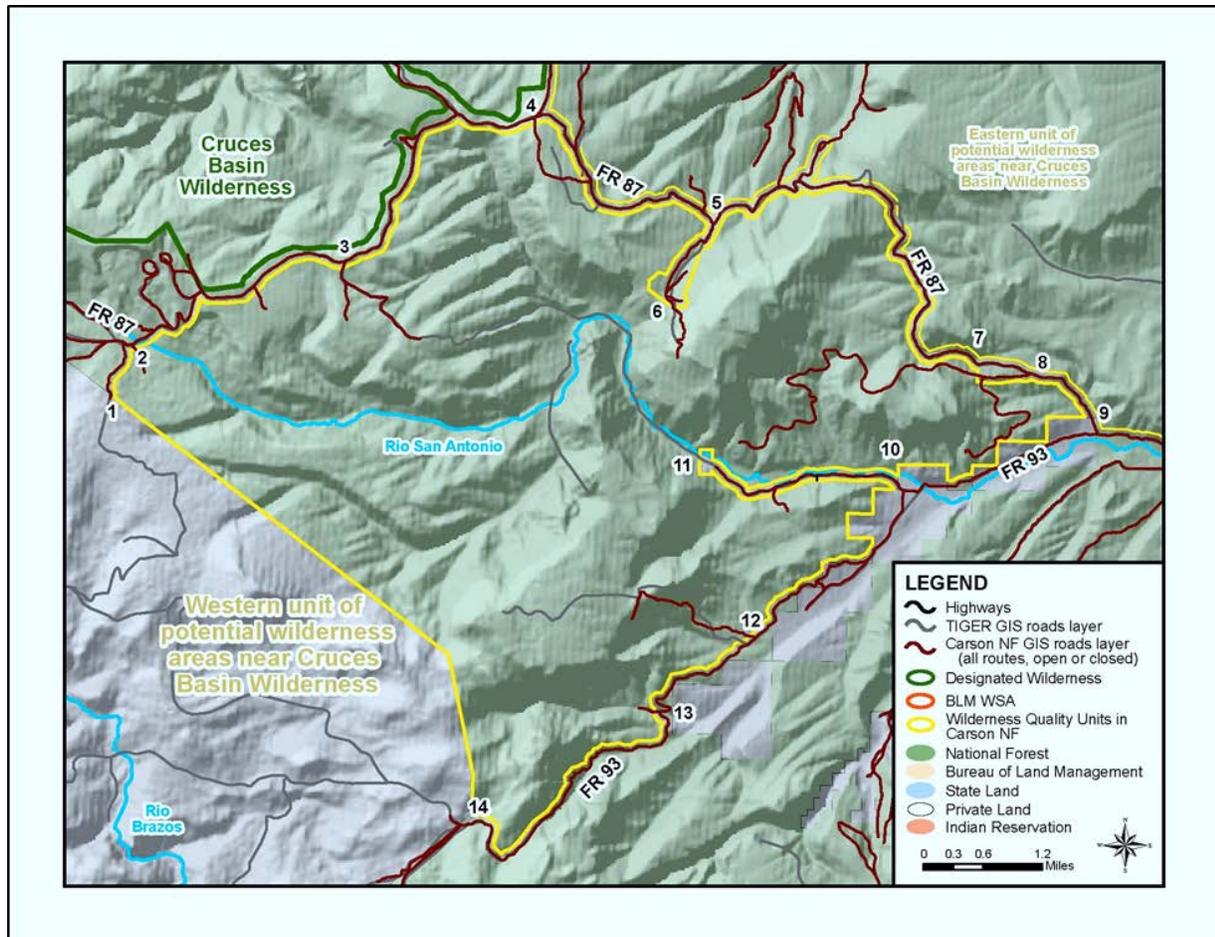


Figure 1: Boundary Description of Proposed Rio San Antonio Headwaters Recommended Wilderness Area

1 to 2: Boundary follows FR 87F. This route shows as closed to public use on the MVUM, but it is a maintained road with access to private land. It is gated and locked about 100 yards past the junction of FR 87F and FR 87, the main road through this region. [10]

2 to 3: Boundary follows FR 87, the main road through this region. Routes 87E, 87BB, 87W, 87X and 87X1 are all shown as not open to the public on the MVUM. In Section 33, due south of where FR 87 and 87B join is an unnamed stock tank along Lagunitas Creek that is clearly functional. The Continental Divide Trail goes right by it. Lagunitas Tank, Danny Tank, North Largo Tank, Sabino Tank, South Alire Tank, Indian Tank, and El Camino Tank all appear functional with no clear routes going to them. North Alire Tank appears blown out. [10]

3 to 4: Boundary continues along FR 87 to the junction with FR 87A. FR 87Z is barely evident in aerials and was closed on the ground, but it is clear that the stock pond it goes to, Dry Lake, is still functional. To the west of FR 87Z is a user created route that goes straight up to the top of the hill west of Dry Lake, but stops at an overlook and doesn't go to Dry Lake. This route is not on the MVUM at all. [10]

4 to 5: Boundary continues to follow FR 87 to the south/southeast. [10]

5 to 6: A cherrystem at FR 87V, which follows a drainage up to an impressive overlook of the Rio San Antonio and Cañon Largo. This cherrystem excludes Valdez Tank and 87V where it ends on the MVUM map. Additionally, it excludes a route and an old quarry just N/NW of where the route meets the overlook. It is a good campsite and excludes the impact of the quarry. The route J12 shown on the MVUM map as closed would be included. There is no evident route going to Duran Tank in the drainage ½ mile northwest

of the quarry, but it is clearly functional in aerials. [10]

5 to 7: Boundary continues along FR 87 past Roadside No. 2 Tank, Alive No. 2 Tank, and Alive No. 1 Tank, all of which are clearly still functional in aerials, but with no evident routes to them. [10]

7 to 8: FR 871 is about a ½ mile route up a ridge off of FR 87. Since FR 871 comes so close to FR 87, the boundary “jumps” from FR 87 where it is in line with the end of FR 871 and excludes FR 871. It is a popular route for camping. It ends at the junction of 871A and 871B. These are likely old logging routes that are shown closed on the MVUM and have been pretty well closed on the ground. [10]

8 to 9 to 10: Boundary continues along FR 87 to the private land near the junction of FR 87 and FR 93. From here the boundary follows private or FR 93, whichever is further north to the cherrystem of 88A. [10]

10 to 11: FR 88A follows the Rio San Antonio past some amazing beaver dams up to a small private inholding. It is one of the few routes in the region not shown as open on the MVUM without closed signs or blockage on the ground. It still receives use, partly because it is so nice up the canyon of the Rio San Antonio and it is a logical place to scout during hunting season. Ideally, if left open and cherrystemmed, the route would be moved away from the river as much as possible. There is clearly no use beyond the private inholding. FR 88A2, shown on the MVUM, would be included. [10]

10 to 14: After FR 88A, the boundary follows private land back to FR 93, excludes another small piece of private land that FR 93 crosses after about ½ mile and then follows FR 93 all the way up the valley of the Rio Nutrias to where it crosses onto the Tierra Amarilla Land Grant. [10]

12: Route 663 is closed on the MVUM. Consideration might be given to cherrystemming it up to a camp where it first reaches ponderosa trees. [10]

13: FR 93A, closed on the MVUM, would be included. The waterbodies up Tanques Canyon are not evident in aerials and may be old beaver ponds. The stock ponds on Olguin Mesa, Murphy Tank, Olguin Mesa Tank, and Olguin Pit Tanks are all clearly functional in aerials, but the routes to them are barely, or not at all, evident. [10]

14 to 1: The boundary heads north/northwest along the boundary between the Carson NF and the Tierra Amarilla Land Grant. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Inventoried Polygon W29

This area is adjacent to the East side of the Cruzes Basin Wilderness, has wilderness unique characteristics and outstanding natural and scenic beauty. It meets the criteria, and would be a viable addition to the Cruzes Basin Wilderness. This area could extend all the way from the existing Cruzes Basin Wilderness to San Antonio Mountain [33]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Lots of water tank structures; high road use; corral units [14]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

This area is adjacent to the east side of the Cruces Basin Wilderness, has unique wilderness characteristics and outstanding scenic and natural beauty, and according to recent studies is a wildlife migration corridor. It meets the criteria and would be a viable addition to the Cruces Basin Wilderness. [44]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The gentle topography is peaceful, pleasant, and beautiful. Sweeping scenic vistas are common through the area. Outstanding opportunities for primitive recreation and solitude are plentiful. The area is undeveloped and wild. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

The 30,901 acre unit is located in the far northern reaches of the Tres Piedras Ranger District. The proposal area is a transitional zone where the semi-arid plains and forests of New Mexico – sagebrush and chamisa, pinon-juniper, and ponderosa pine – gradually phase into the high-country parklands and spruce-fir and aspen forests of Colorado. [10]

The Rio San Antonio flows through the area. The river's headwaters are located just west of this unit. The Rio Antonio flows past Mesa Olguin and out into a grass and sage brush valley that is part of the upper reaches of the Taos Plateau Volcanic Field. At this point, it follows along the main roads that access this area, FR 93 and FR 87. The river passes Stewart Meadows, a wetland within the proposal area that has been restored by the New Mexico Environment Department – Surface Water Quality Bureau. Just past Stewart Meadows, the Rio San Antonio begins cutting a canyon into the hard, black basalt of the Taos Plateau Volcanic Field. It bends to the north and after a few more miles in the deepening canyon, crosses onto BLM land and the Rio San Antonio WSA. It is still another 7 miles through the WSA before it joins the Rio de los Piños. [10]

To the north and west of this significant canyon carved by the Rio San Antonio is a vast expanse of grasslands, sage brush meadows, pinyon-juniper and ponderosa forests, and, at its upper reaches, very large patches of aspen. Toward the middle of the unit is a campground that overlooks Laguna Larga, a depression that is often filled with water. It is part of a line of craters that speak to the volcanic past of this region. [10]

The 7,050-acre San Antonio Wilderness Study Area (WSA), managed by the BLM, is immediately adjacent to the proposed Rio San Antonio Recommended Wilderness Area. In April 2016, the Senate passed the Energy Policy and Modernization Act; this bill included the Cerros del Norte Conservation Act (S. 1240), which would designate the San Antonio WSA as wilderness. The BLM's Taos Field Office also recognizes another 9,874 acres of Lands with Wilderness Characteristics (LWC) located on the eastern side of the San Antonio WSA. The size of the combined proposed Rio San Antonio Recommended Wilderness Area and the BLM's WSA/LWC wilderness complex is 47,825 acres. Together, these lands make a single, large, network of wildlands. See Attachment A for a detailed description of the proposal area's boundary. [10]

APPARENT NATURALNESS

The unit is overwhelmingly natural. It is part of a very large landscape of undeveloped, wild lands in Northern New Mexico and Southern Colorado. Open grasslands are the dominate ecosystem. Ponderosa pine, much of which is old growth, climb the hillsides. Riparian habitats, including wetlands, wet meadows,

and streams are all represented. The area also enjoys an abundance of wildlife. The type of habitat found in the unit sustains healthy populations of game species such as elk, antelope, and mule deer as well as predator species such as mountain lion and black bear. [10]

The area appears predominantly natural and undeveloped, with the scattered imprints of man substantially unnoticeable. There are very few roads that are open to public motorized use in the northern reaches of the Tres Piedras Ranger District, including lands within this unit. Any open roads shown on the MVUM either serve as boundary roads to the area or are cherry-stemmed. Most of the old closed roads and unauthorized routes in the area that are unavailable for public motorized travel have faded back into the landscape from lack of use. Scars on the landscape from logging and mining are non-existent. [10]

The only improvements that are present on the landscape are those related to grazing and even these are hardly noticeable. These grazing improvements are undetectable due to their condition, materials from which they are constructed, and location on the landscape relative to surrounding topography. The unit has numerous built ponds in its backcountry. Based on aerial photographs and site visits, many appear functional. For most, it is hard to discern the location of the road that is used to access the pond. Relative to the area as a whole – which is vast and remote - existing grazing improvements are unnoticeable. [10]

In summary, the area's primitive and untrammled character dominates the landscape. The area does not have any permanent structures, and the occasional signs of human activity, such as abandoned routes, stock ponds, and fencing, are substantially unnoticeable due vastness of the landscape, vegetative cover and topography, and natural reclamation. Photographs of these human imprints, alongside photographs of wilderness character, are provided in Appendix 3. [10]

OUTSTANDING OPPORTUNITIES FOR SOLITUDE OR PRIMITIVE AND UNCONFINED RECREATION

Opportunities for solitude are omnipresent. The 16,897 acres of BLM WSA and LWC that are directly adjacent to the area make a continuous block of connected wilderness quality lands. The adjacency of these administratively recognized wildlands make the proposal area that much more remote and isolated. Once visitors leave the boundary roads, they experience complete solitude and know that they are within a place untrammled by humans and primeval in character. In our survey work, we encountered very few people and observed minimal signs of humans. [10]

The gentle topography instills a sense of peace and quietude. Relative to the rest of the forest, the Carson designated very few roads and trails as open to public motorized use in the travel planning process in this landscape. This lack of designated roads and motorized trails in combination with its remoteness from any population centers have left the area largely undiscovered, untrammled and pristine providing opportunities for solitude. [10]

Unconfined recreation is plentiful in the grassy, rolling landscape. The abundance of beaver dams, the presence of running water year-round, and the overall ecological quality of the landscape make this is a prime area for wildlife viewing. Many of the streams in the region are popular among anglers. Vast, open, scenic vistas are common throughout the area. [10]

The nearby Cruces Basin Wilderness is a popular hunting destination. Recommending additional lands for wilderness in the vicinity could alleviate pressures put on the Wilderness. [10]

SUPPLEMENTAL VALUES

The New Mexico Natural Heritage Program recently released a report that documents opportunities to provide for landscape connectivity in the Upper Rio Grande Landscape. The Heritage Program aggregated all of the connectivity and wildlife movement related data in this landscape in attempt to identify "hotbeds" for connectivity. The data is from a variety of sources including Colorado Parks and Wildlife and New

Mexico Department of Game and Fish. The Heritage Program's report found that an important area for landscape connectivity exists from the South San Juan Wilderness in Colorado to the Cruces Basin Wilderness and then moving east to the BLM's San Antonio WSA/LWC complex in the Rio Grande del Norte National Monument. The report calls this area the Northern Taos Plateau Wildlife Movement Focal Area. Specifically, the lands in this proposal area play a critical role in terms of providing landscape connectivity. This natural Heritage Program's report is provided as Appendix 4 to this letter. [10]

The NMDGF identified the area as winter habitat for elk and habitat for antelope. (See maps in Attachment B.) The lush meadows and running water found year-round in the area provide important habitat for numerous species. [10]

The Carson National Forest hosts numerous ecosystem types that are poorly-represented in the National Wilderness Preservation System (NWPS). We calculated the proportion (%) of each Forest Service wilderness inventory area that is composed of ecosystems inadequately represented in the NWPS. See Appendix 1. Based on this analysis we found that 10.7% of inventory unit W29 is comprised of ecosystem types that have less than 5% representation in the NWPS; 78% of W29 has only 5-9.9% representation federally; and 11% of W29 has only 10-19.9% representation federally. Together 99.8% of the unit is comprised of ecosystem types that have less than 20% representation in the NWPS. See Appendix 1, Tables 1-3 for more information about the ecosystem types found in unit W29, and their representation in NWPS. [10]

MANAGABILITY

The size and shape of the proposed Rio San Antonio Recommended Wilderness Area assures manageability. The majority of the area is isolated from areas of human activity, with limited access and very few encumbrances. The area does not have motorized activity occurring within its proposed boundaries. There are no private lands within the area. There are no extrusions or bottlenecks. Proposed boundaries follow designated roads, forest service administrative boundaries, and topographic features. The area is directly adjacent to the BLM's San Antonio WSA, which is managed to maintain its wilderness character. This adjacency could offer consistency in land management. According to LR 2000 (as of April 22, 2016), there are no active or pending mining claims in the area. [10]

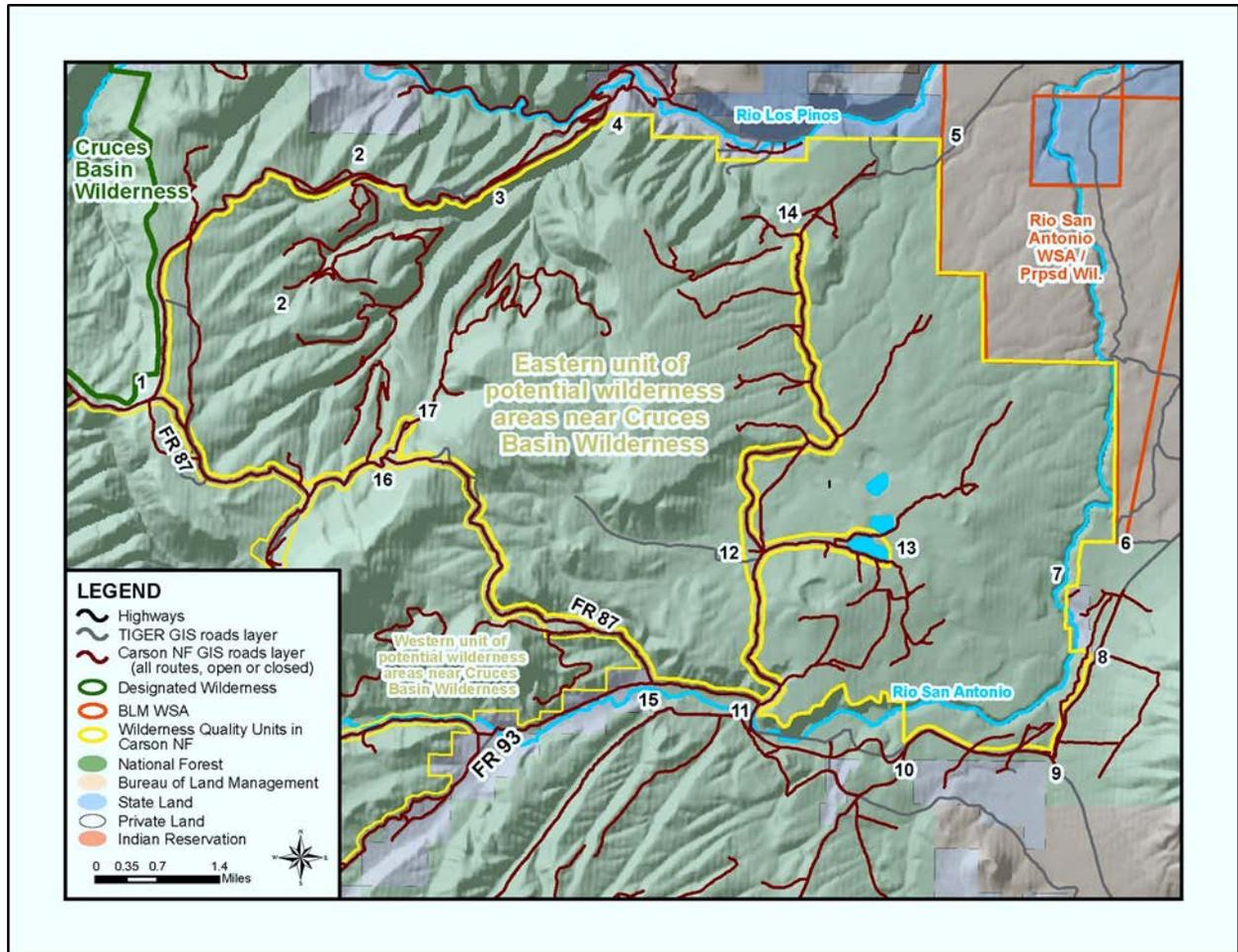


Figure 2: Boundary Description of Proposed Rio San Antonio Recommended Wilderness Area

1 to 2: Boundary follows FR 87A. There is an unnamed route shown on the USGS quad map going from Section 7 south through Sections 18 and 19 to FR 87, the main road through this region. It follows a fenceline and gets little use. In Section 18, a cut-off route, also unnamed, leads down the hill to this route to a clearing in the aspen with a great view. Both of these routes are included. Camino Tank, Ojito Spring Tank, Buck Tank No. 1, and Buck Tank No 2 are all clearly functional in aeriels. Routes to these tanks are not evident. [10]

2 to 3: Boundary follows FR 87A to junction with 87A3. Route 87A1 has been closed off at its beginning. Off of this long route are K19 and a series of unnamed routes. All of these routes are closed to the public on the MVUM. [10]

3 to 4: Boundary follows FR 87A3 to private land. Route FR 87A3 follows a ridgeline above FR 87A. It is shown as closed on the MVUM. The route is particularly well used on its western end. Cub Tank is clearly functional in aerial, but there is no evident route to it. [10]

4 to 5: Boundary continues around private land and then state land over to the boundary of the Rio San Antonio WSA/proposed Wilderness. [10]

5 to 6: Boundary follows administrative boundary between the Carson NF and the Taos BLM, all of which is also the Rio San Antonio WSA/proposed Wilderness boundary[10]

6 to 7: To exclude an old ditch system and other impacts visible in aeriels in Sections 35 and 36, the

boundary goes west along the Section 26 / Section 35 line to the rim of the Rio San Antonio and follows the rim south to the “T Bone Ranch” private inholding. [10]

7 to 8: Boundary goes around “T Bone Ranch” and connects to FR 118. [10]

8 to 9: Boundary follows FR 118 to FR 87 and excludes the unnamed stock pond that is at the junction of these 2 roads. A route parallel to FR 118 from this stock pond to “T Bone Ranch” is not evident on the ground, not open on the MVUM, and is included in the unit. To the west on the other side of the Rio San Antonio is a stock pond in Ursulo “Lake” (a natural depression that is mostly dry) that is clearly functional in aerials, but with no route to it being evident. [10]

9 to 10: Boundary continues west along FR 87 to the junction with FR 87 and FR 133. Two routes, FR 109 shown as closed on the MVUM, and another shown on the USGS quad map, but not on the MVUM, are included. They are barely evident on the ground. [10]

10 to 11: From the junction of FR 87 and FR 133, the boundary goes straight north to north rim above the Rio San Antonio and then follows the rim westward to reconnect with FR 87 very near the junction with FR 78. This excludes Stewart Meadows, the site of an old homestead and associated old farming impacts. Stewart Meadows is also a restoration site. [10]

11 to 12: Beginning of cherrystem up FR 78. Included in the unit is FR I15, which has been effectively closed at its junction with FR 78, and FR I16, an offshoot to FR I15. [10]

12: Boundary leaves road to exclude a functional stock pond and ditch. There is a two-track going east that is not on the MVUM or Carson NF roads shapefile, but is on the TIGER shapefile. It goes all the way to Casas Tank, which is functional. Romero Tank is clearly functional, but no route to it is evident. [10]

12 to 13: An excluded area to encompass FR 78, Laguna Larga and its adjacent CG, the beginning of FR H10 to where it reaches a ditch between Laguna Larga and a lake/depression to its north, and a very evident ditch system heading west from Laguna Larga ending near the junction of FR 78 and FR 78A. Routes included in the boundary are FR 78C, FR H9, FR 78D past the eastern end of Laguna Larga, FR H10, H11, and I14. Also included is a user-created route not on the MVUM or the Carson NF GIS roads layer that leads up to Pit Tank No. 3, which is clearly functional. [10]

12 to 14: Cherrystem of FR 78A up to the junction FR H13 and FR 78A1. Routes FR 78A1, H6, H13, K6, 78A2, H14, H15, 78A3, and 78A4 are all closed on the MVUM and would be included. Chino Dry Lake Tank, Chino Peak Tank, Chino Tank, Pinabetal Tank, Park Tank, Aspen Tank, and Pit Tank No. 2 are all clearly functional in aerials. Chino Dry Lake Tank and Chino Tank are near FR 78A. The routes to the remaining tanks (stock ponds) are not evident at all in the vicinity of the tanks. [10]

11 to 15: Boundary follows FR 87 from its junction with FR 78 to its junction with FR 93. Pit Tank No. 1 and Indian Joe Tank are clearly functional in aerials, but the routes to them are not evident. [10]

15 to 16: Boundary follows FR 87 to the junction of FR 87T. This area is popular for camping but most impacts of this activity are within the 300ft buffer along FR 87 and excluded from the unit. At the divide in Section 27, a user-created route goes straight up the hill to the north. It is included in the boundary. [10]

16 to 17: Cherrystem of FR 87T about ½ mile in to where it stops at the fence before Oso Spring. This route is not shown on the MVUM, but does show as open on the Carson NF travel map created before the MVUM and shows evidence of recent maintenance. After its closure at the fence, it still shows in aerials, but is much less apparent. Adjacent to this closed route is Oso Tank, which is clearly functional. FR K16 and the remainder of FR 87T are included in the unit. [10]

16 to 1: Boundary continues up FR 87 to its junction with FR 87A. FR 87U, K13, and K14 are all closed on

the MVUM and included. Lola Tank and Roadside Number One Tank are clearly functional in aerials, but no routes to them are evident. Lola Tank No. 2 does not appear to still be functional. The end of the unnamed route discussed in 1 to 2 above that connects with FR 87 in Section 19 is just a faint 2-track that is barely evident after it reaches a fence line about 500 feet from FR 87. [10]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

This whole part of the Carson, in the northern part of the Tres Piedras District, is big wild, undeveloped country. Lots of rolling hills and scenic views across a vast landscape. It's also adjacent to the BLM's San Antonio Wilderness Study Area. [39]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Inventoried Polygon W30

evidence of human activity, roads and past logging, Man-made water tanks, Heavy ATV uses, Noisy highway through area, Access to private land, Numerous mining claims [14]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

W30 Valle Grande – main stock driveway [14]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Evaluated Polygon W17f

Had several small timber in part of the area or adjacent to the area. Hunters like area and do use mechanical equipment to access the area. Some old road access into the upper part of the area. Lower part is steep and hard to get into. Railroad is heard and visible from parts of the area also.... Would not include this area or make the area smaller roughly from where the area designation starts at the Bottom of the lettering on the interactive map. [4]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

This area, adjacent to the East side of the wilderness, has wilderness unique characteristics and outstanding natural and scenic beauty. It meets the criteria, and would be a viable addition to the Cruces Basin Wilderness. [33]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

This area adjacent to the east side of the Cruces Basin Wilderness also meets the criteria and would an

appropriate addition to the Wilderness. [44]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Train whistle clearly heard several times during site reconnaissance on July 7, 2016. [38]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Portion within San Antone Allotment: 1,640 acres (98% of Study Area) [38]

Elevations range from 9,900s' along the ridges to 8,500s' in Hondo Canyon. [38]

Significant views and vistas are limited due to the terrain and forest canopy. [38]

Train whistle from Cumbres and Toltec RR can be heard throughout Study Area. [38]

FR 87A is a popular and very scenic site seeing route and is also designated as part of the BackCountry Discovery Route (BDR), an internationally known motorcycle route. [38]

Water impoundments and related rangeland features exist throughout the study area. [38]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

- 1) NMDA Recommendation: Remove from further consideration. Below is a list of features and concerns that should exclude this polygon from further consideration in the Evaluation Phase. The reasons for excluding polygons with these specific features are found in the "Issues of Concern" section above. [3]
- 2) Evaluation Criteria Definition Matrix
 - a) Criteria 1: Apparent Naturalness
 - i) Wildfire Hazard Potential
 - (1) Some areas of this polygon have a rating of "high" and "moderate."
 - ii) Constructed Features
 - (1) A nonrange property boundary fence (ID No. 6319) borders the eastern boundary of this polygon.
 - (2) All the constructed features listed under Criteria 5 (related to constructed features for grazing allotments) detract from apparent naturalness and should be considered under Criteria 1, as well.
 - b) Criteria 2: Opportunities for Solitude or Unconfined Recreation
 - i) Two roads are within this polygon: USFS Route No. 494A and Route No. 573. Another two roads are within 1/5 mile from the polygon boundary: USFS Route No. 87A and Route No. 494. All these roads will likely impact a visitor's opportunity for solitude.
 - c) Criteria 4: Unique and Outstanding Qualities
 - i) Important Watershed Features
 - (1) The Canon Hondo intermittent stream is within this polygon.
 - d) Criteria 5: Wilderness Characteristics Manageability
 - i) Grazing
 - (1) Allotments
 - (a) This polygon is mostly within the San Antone grazing unit, which is utilized by nine permittees. The polygon also contains portions of the Lagunitas grazing unit.
 - (2) Constructed Range Features

- (a) Fences
 - (i) Two allotment fences are within this polygon. Additionally, allotment boundary fences border the northern and western portions of this polygon. All these fences must be regularly maintained by grazing permittees.
- (b) Water Storage Tanks
 - (i) The Rudy water storage tank, the Hondo Number Two water storage tank, and the Hondo Number One water storage tank are within this polygon.
- (3) Roads and Trails
 - (a) Two roads are within this polygon: USFS Route No. 494A and Route No. 573.
- (4) Fire History
 - (a) The lightning-caused San Miguel Fire burned between 0.26 – 9.9 acres in 1996 within this polygon.
 - (b) An unnamed lightning-caused fire burned between 0 – 0.25 acres in 1974 within this polygon.
- (5) Management of Surrounding Lands
 - (a) This polygon is adjacent to the Cruces Basin Wilderness and is surrounded by the Carson.
- (6) Wildland Urban Interface
 - (a) The entirety of this polygon is within the Tres Piedras Cat 4 WUI. [3]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Evaluated Polygon W17k

Current wilderness is in the basin below the rim. Addition the area has problems in that some old track and roads in the area. Has numerous hunting camps and access to the camps in the area. Access from FR87 across the flats. Would be hard to administer due to travel time to arrive at the area. Snowmobiling used the area as evidenced by past trespass into the cruces basin wilderness. Railroad is heard form parts of the area....Should not be considered for wilderness. [4]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

We are opposed to this parcel being recommended as Wilderness in the Forest Plan. The Continental Divide National Scenic Trail (CDNST) traverses this parcel and it is currently open to bike travel. It is therefore imperative that this parcel is not recommended for Wilderness designation as maintaining access to this trail is of the highest priority for our community. Any movement that might lead in the direction of closure to this bike asset will be actively opposed and defended. While wilderness characteristics may exist in this parcel, we believe that there are equally important characteristics that counter this. A Recommended Wilderness designation would ultimately lead to restrictions for mountain bike access, essentially cutting of north-south passage via bicycle on a section of currently bike accessible trail. [8]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

This area, adjacent to the NW corner of the wilderness, has unique wilderness characteristics and outstanding natural and scenic beauty. It meets the criteria, and would be a viable addition to the Cruces Basin Wilderness. [33]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

This area adjacent to the northwest corner of the Cruces Basin Wilderness meets the criteria and would be an appropriate addition to that Wilderness. [44]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Portion within Apache Allotment: 2,530 acres (95% of Study Area). [38]

Despite the poor road conditions in this area, FR 87 and FR 74 are very active corridors for recreation, hunting/fishing access and ranching. [38]

Forest Road 87 is part of the Great Divide Mtn Bike Route and is used by hundreds of cyclists and motorcyclist annually. [38]

Train whistle and smoke/steam from Cumbres and Toltec RR can be seen & heard in the northern half of study area and from atop Brazos Ridge[38]

Motor noise from ATV's, motorcycles and vehicles using FR 87 & 74 can be heard from the ridge. [38]

Camps and numerous forest roads are visible from the ridge to the west. [38]

While it does not meet Wilderness criteria, Brazos Ridge affords outstanding panoramic views in all directions. It's an ideal spot to view the Cruces Basin. [38]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

- 1) NMDA Recommendation: Remove from further consideration. Below is a list of features and concerns that should exclude this polygon from further consideration in the Evaluation Phase. The reasons for excluding polygons with these specific features are found in the "Issues of Concern" section above. [3]
- 2) Evaluation Criteria Definition Matrix
 - a) Criteria 1: Apparent Naturalness
 - i) Wildfire Hazard Potential
 - (1) A few areas of this polygon have a rating of "high" and "moderate."
 - ii) Constructed Features
 - (1) All the constructed features listed under Criteria 5 (related to constructed features for grazing allotments) detract from apparent naturalness and should be considered under Criteria 1, as well.
 - b) Criteria 2: Opportunities for Solitude or Unconfined Recreation
 - i) USFS Route No. 74 runs along the western boundary of this polygon. Even though the road is outside the boundary of the polygon, it will likely impact a visitor's opportunity for solitude.
 - c) Criteria 4: Unique and Outstanding Qualities
 - i) The Rio De Los Pinos runs along the northeast boundary of this polygon. The Osier Creek, a perennial stream, is located within this polygon.

- d) Criteria 5: Wilderness Characteristics Manageability
 - i) Grazing
 - (1) Allotments
 - (a) This polygon is mostly within the Apache grazing unit, which is utilized by eight permittees. The polygon also has a portion of the Sublette grazing unit, which is utilized by four permittees.
 - (b) Also within this polygon are several pastures: the Sublette pasture and four Apache pastures.
 - (2) Constructed Range Features
 - (a) Fences and Gates
 - (i) Two wire gates are within this polygon.
 - (ii) Four interior range allotment fence lengths are within this polygon. All these fences must be regularly maintained by grazing permittees.
 - ii) Roads and Trails
 - (1) USFS Route No. 74 runs along the western boundary of this polygon.
 - iii) Management of Surrounding Lands
 - (1) The eastern portion of this polygon borders the Cruces Basin Wilderness.
 - (2) The northern boundary of this polygon borders non-USFS land.
 - iv) Wildland Urban Interface
 - (1) Over half of this polygon is within the Tres Piedras Cat 4 WUI. [3]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Evaluated Polygon W29c

Some of area was accessed in the old Pinebatal timber sale, remnants of equipment used such as pistons and similar been located within the area, some old road tracks in the area. Potential of having old Spanish trail crossing the area which while historic would leave tracks some evidence of access to the area from the T-bone ranch lands. ATV use occurred from the private and area near the pit tanks Laguna Largo tough going but passable....Drop this from further consideration. [4]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Portion within San Antone Allotment: 2,488 acres (100% of Study Area) [38]

Rio San Antonio Gorge comprises only 350 acres of Study Area (14%)[38]

Elevations range from approximately 9,000 feet along the western plateau to 8,400 feet in the northeastern corner along Rio San Antonio. [38]

Long barren vistas from Study Area and obvious signs of human encroachment including radio tower and clear cuts on San Antonio Mtn, dust trails from traffic on FR 87 & 118, steady truck traffic on US 285, four miles to the east. [38]

Rangeland shows evidence of heavy grazing and past drought. [38]

CNF Response: This comment was considered during Evaluation and is addressed in the

documentation of the Evaluation process and rational.

- 1) NMDA Recommendation: Remove from further consideration. Below is a list of features and concerns that should exclude this polygon from further consideration in the Evaluation Phase. The reasons for excluding polygons with these specific features are found in the “Issues of Concern” section above.
- 2) Evaluation Criteria Definition Matrix [3]
 - a) Criteria 1: Apparent Naturalness
 - i) Wildfire Hazard Potential
 - (1) The southwestern corner of this polygon has a rating of “moderate” and a few areas with a rating of “high.”
 - ii) Constructed Features
 - (1) All the constructed features listed under Criteria 5 (related to constructed features for grazing allotments) detract from apparent naturalness and should be considered under Criteria 1, as well.
 - b) Criteria 2: Opportunities for Solitude or Unconfined Recreation
 - i) Five USFS roads are within ¼ mile of this polygon: Route No. H10, Route No. H11, Route No. 78D, Route No. I14, and Route No. 118A1. Even though the roads are outside the boundary of the polygon, they will likely impact a visitor’s opportunity for solitude.
 - c) Criteria 4: Unique and Outstanding Qualities
 - i) An unnamed water body is on the western boundary of this polygon.
 - d) Criteria 5: Wilderness Characteristics Manageability
 - i) Size
 - (1) This polygon is 2,488.29 acres and is not adjacent to an existing wilderness area. NMDA asserts this area will be too small to manage as wilderness, therefore, should be removed from further consideration in the wilderness inventory process.
 - ii) Impaired Surface Waters
 - (1) This polygon contains one impaired surface water that will need access in order to restore it: Rio San Antonio.
 - iii) Grazing
 - (1) Allotments
 - (a) This polygon is entirely within the San Antone grazing unit, which is utilized by nine permittees.

- (2) Constructed Range Features
 - (a) Fences and Gates
 - (i) There are two wire gates located on the boundary of this polygon.
 - (ii) A range allotment boundary fence is the northern boundary of this polygon. A range allotment boundary fence is also on the southern boundary of the polygon. All these fences and gates must be regularly maintained by grazing permittees.
 - iv) Roads and Trails
 - (1) Five USFS roads are within ¼ mile of this polygon: Route No. H10, Route No. H11, Route No. 78D, Route No. I14, and Route No. 118A1.
 - v) Management of Surrounding Lands
 - (1) The northern and eastern portions of this polygon are bordered by BLM Land. [3]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Mesa Vibora-Cerro Azul Evaluation Area

CNF Response: No comments specific to this area.

Tres Piedras/Lucero Lakes Evaluation Area

Inventoried Area W14

Rio Grande Lucero Lakes – lots of down and dead – poor and debilitated exclosures not maintained for years. Broke-off – not good hiking – very rocky would not be desirable – stock tanks fenced between broke-off and Lucero Lakes. [14]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

heavily accessed by vehicles and ATVs / man made structures / private land (corral units) [14]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Rio Tusas Watershed Evaluation Area

Inventoried Area W4

wild horses present Man-made dirt tanks [14]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

El Rito Ranger District/Canjilon Ranger District

We, our families and our affected community herewith protest the actions of the United States Governments Agencies, ie., Forest Service, Bureau of Land Management, Environment Protection Agency and the Congress of the United States to create a wilderness of those lands administered by

US Forest Service and the Bureau of Land Management surrounding the community of El Rito, New Mexico in Rio Arriba County. [24]

It is clearly evident that the destruction of the Community of El Rito, the suppression of its history, its culture, and the elimination of religious ties to the land within the proposed wilderness is the purpose and objective of this wilderness scheme. [24]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Should Congress and its federal agencies persist in declaring an unnamed wilderness area 8000 jobs will eventually be lost; meat costs will increase; the denial of wood harvesting will create a hardship for thousands of families; Rio Arriba's County funds will be affected as will the school's funds due to the wilderness by eliminating the PILT [Payment In Lieu of Taxes] which amounted to millions of dollars provided to Rio Arriba County; the proposed wilderness will cause taxes to be lost due to lost jobs, industries, allied services, etc. Land values will decline due to the proposed wilderness. Water quality and safety will decline due to the lack of forest management. Access to private lands within the boundaries of the proposed wilderness will be denied. There are legal provisos and land issues within the proposed wilderness needing decisions that will have an affect on the proposed wilderness. [24]

Dear Congress and your federal agencies, do not allow these lands to be declared a wilderness. We have identified more than enough legitimate reasons why this area is not suited to be declared a wilderness. [24]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Vallecitos SYU – was est. by congress as a sustained yield to manage the unit. Dos not fit with wilderness concept. Which act of congress supercedes the other? Either way should be managed as it is highly dep__ed landscape – will likely not pass analysis or be reconnected. [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

As a permittee on the El Rito Lovato I am completely + totally against any propose for wilderness anywhere within the El Rito Ranger District. [19]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

In my opinion El Rito Lobato on Unit 51 does not lend itself as a wilderness area. [53]

Traditional/cultural sites will be unaccessible [53]

I feel this is discriminatory & Discriminatory against the elderly & Disabled [53]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

All of this area is historical to Livestock Allotment owners habitats [53]

Historical Roads for timber Harvest [53]

Several watering holes and man made tanks that require constant surveillance [53]

Much of this area is suitable for timber management and is good quality timber

Loss of timber management & wildlife Habitat improvement [53]

Logging/Mineral Resources [53]

Fire control at the private land interface [53]

NOT IN Favor of Carson National Forest Wilderness Proposition! [53]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I am against having a wilderness area in the El Rito Lobato-West allotment and the Cano allotment in the vicinity of El Rito. We need this area for grazing cattle, for hiking, for recreational use, to enjoy nature, for pinion picking every so many years when there is pinion available, for wood gathering. We have too many side roads. [53]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Our rationale(s) for the protest of the unnamed wilderness are: [24]

1. the continuing deliberate and malicious destruction and erasure of our Hispanic history, customs and culture. This in itself is a violation of the National Environment Protection Act.
2. a continued denial and refusal to honor the provisos specified in the Juan Jose Lovato Land Grant sales I purchases to have been granted to the heirs from El Rito and other communities. [The denial of those provisos to land grant heirs is subject of a legal decision (s). [ie... Juan Jose Lobato Land Grant]
3. this proposed wilderness will suppress economic growth and development in the area and in most of Rio Arriba communities.
4. the proposed wilderness is a nothing more than a ruse that will be used to eliminate the Yale Sustain Unit established by the Congress of the United States. The Yale Sustain Unit as established by the Congress of the United States serves half a dozen communities in the region and is potentially a large economic development enterprise creating dozens of jobs.
5. the elimination of the religious trails used by Los Hermanos de las Moradas de Jesus from El Rito, La Madera, Abiquiu and other communities during their religious ceremonies. To eliminate this religious history and actual religious trails is a violation of religious freedom and a violation of EPA intent and law.
6. the proposed wilderness will devalue the lands in the region.
7. access to private lands will be denied.

8. access to scenic sites will be denied.
9. access to recreation sites will be denied.
10. access to hunting and fishing will be denied.
11. the J and R brothers have invested large sums of money into their livestock operation which includes grazing permits on USFS land and BLM lands. A large portion of their private lands is in the El Rito Canyon and surrounded by the proposed wilderness. History indicates that their grazing rights to sheep and cattle will be eliminated. Their private property will be devalued to almost nothing because of limited access. Limited access will deny the family build-a summer home on their land.
12. the ZENITRAM family have invested large sums of money into their livestock operation which includes a meat processing and meat products facility. Their business includes grazing permits on the El Rito USFS District and the Canjilon USFS District. They own private lands on the El Rito and on the Canjilon.

Wilderness history indicates that their grazing permits will be eliminated. Their land values will be driven to almost nothing due to limited access. The ZENITRAM Meat Products and Processing will be destroyed by the proposed wilderness because of no grazing which means no sheep and cattle to process and market; fifteen (15) employees will lose their jobs!
13. the proposed wilderness will encompass El Rito, Vallecitos, La Madera, Petaca, Canjilon, Abiquiu, Canyon Plaza, Cebolla, TietTa Amarilla; basically all lands and communities east to the Rio Grande, north to the Colorado border, west to the Navajo Reservation and south to Espanola, New Mexico. It is this gigantic area that is the proposed unnamed wilderness.
14. the unnamed proposed wilderness will displace 500 USFS employees.
15. 500 seasonal wood workers will be displaced.
16. 1000 or more wood heated homes will be directly affected due to the curtailing of wood harvesting because of the unnamed wilderness. The curtailing of wood harvesting will cause a terrible hardship on numerous households because they will have to go to gas heating and cooking.
17. some 1000 allied services employees will be displaced because of the proposed unnamed wilderness. The allied services employees are: truckers, laborers, mechanics, grocers, vendors, etc.
18. the reduction of livestock will displace 200 or more families. 1000 or more livestock industry employees will lose their jobs because of the proposed wilderness. Meat prices for the table will increase tenfold because table meat will need to be imported.
19. the proposed wilderness will deny communities special use permits for wells as has been done in El Rito because of an unnamed proposed wilderness; the community will risk survival with a 32 foot hole called a well because of a proposed wilderness to be named for who or for a what.
20. the Clean Water Act, Clear Water, Source Water Protection, Safe Water, Sufficient Water Acts and actions will be abated by the proposed wilderness. All NEPA intents and laws are being abnegated by this proposed wilderness.
21. the acequias may be erased due to access posed by the proposed wilderness. Most of the acequias within the proposed wilderness predate the Forest Service by hundreds of years. The acequias are the very life of the El Rito community and many other communities in terms of growing pastures, gardens, fruit trees, feeding the aquifers -wells.
22. from the rangers districts 100's of tons of building rock are mined each year; those workers,

truckers, masons, etc. will be displaced due to the proposed wilderness; at least 200 employees will be displaced due to the proposed wilderness.

23. the proposed wilderness will displace one half a dozen New Mexico Game and Fish employees.
24. thinning contractors / contracts will be eliminated as will their employees be eliminated.
25. Nuts! Pinon Nuts not pine nuts. The proposed wilderness will deny thousands of people the food staple pinon nuts; pinon nuts have been a food staple for hundreds of years for thousands of people; there are thousands of miles of roads into the pinon harvesting forests that will not be available to pinon nut harvesters thereby denying harvesting access to a food harvest.
26. New Mexico State Land Leases will be jeopardized by this wilderness action.
27. declaring a wilderness to cover poor fiscal management is not a good enough reason. The local district offices have done well with little.
28. the proposed wilderness information meetings, the show and tell meetings were held at very inopportune times in June and July; June and July are the busiest time for livestock producers because of calving, lambing, irrigating, and trucking livestock to the grazing areas. Possibly, several hundred more concerned affected citizens within the proposed wilderness area would have protested this wilderness area had it not been for deliberate inopportune timing denying them the due diligence to protest generally accepted as correct and proper.
29. How will the numerous graveyards within USFS lands be treated by the proposed unnamed wilderness. [24]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I suspect this polygon [Wxs678] if it included adjacent BLM managed public land would exceed 5000 roadless acres and may have wilderness character. It and adjacent BLM roadless should be included in analysis. [35]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

I suspect that this polygon [Wxs598] if included adjacent roadless BLM managed lands would exceed 5000 acres and may possess wilderness character [35]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Alamosa Evaluation Area

Inventoried Polygon W19

I'm entering this comment to call awareness to a developing recreational use in area WD19 and to argue for its exclusion from a wilderness designation for this area. Many of the hillsides in area WD19 contain quartzite boulders and cliffbands with exceptional qualities that make the rock ideal for recreational rock climbing (bouldering). Climbers from New Mexico and Colorado have been visiting these areas for many years and recreational use will inevitably increase as word spreads. These areas are remote and access requires motorized use of forest roads bordering, or contained

within, the inventoried area, WD19. Specifically, FR 725 and spurs 725G, 725H, 725T4, and 725T7 provide the necessary access. Please consider this established and growing recreational use opportunity for the Carson NF in determination of future wilderness areas; that is, please omit area WD19 from wilderness designation. [54]

CNF Response: This comment would have been appropriate during Analysis, however, this area was determined not to have wilderness character.

Mesa Montosa/Ghost Ranch Evaluation Area

Extent of adjacent BLM roadless public land should be included in analysis of Wilderness character of this expanded FS-BLM roadless polygon. [35]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Inventoried Polygon W15

range grazing and water structures development [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Evaluated Area W31d

Would question whether this proposal has support of the Canjilon community. Most of area is below the cliffs, rim somewhat inaccessible. Not developable with current and likely technology. Designation would increase numbers visiting and using the area. Difficult to administer....Should not be considered for wilderness. [4]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Used for grazing by ranchers for many generations. Most of the area is covered by pinon trees. It is not typical wilderness area country side. There are many access roads leading into the area from US Hwy 285. There is very little water in the area. Ranchers that utilize the area are forced to truck in water and fill up tanks. The area has been used too long for grazing, wood gathering, to change now. [7]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

We are opposed to this parcel being recommended as Wilderness in the Forest Plan. There is trail in this parcel from Ghost Ranch to the CDNST. This is a remote area for experienced riders, providing a valuable, cherished and aspirational backcountry experience and as such our request is that this parcel is not included in your final Recommended Wilderness classification for these reasons. [8]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or

the effects analysis of alternatives.

On behalf of our livestock association we would like to comment on the wilderness evaluation that will have a huge impact on our forest allotments. First many of the areas shown do not fall under the required wilderness characteristics. Several of the areas on the inventory map listed as possible areas are greater than 5,000 acres. As we all know a wilderness is defined under the 1964 Wilderness Act as "an area where the earth and its community of life are untrammelled by man, where man himself is a visitor that does not remain." [55]

Contrary to the belief of the USFS, we allotment owners, community, county and state residents need to tend to our livestock and private owned lands within this proposal. We need access to satisfy the requirements of good stewardship practices that has been in existence for many decades now. One prime example is our natural springs used to water our livestock are in dire need of repair. An annual maintenance is required sometimes more. Designating wilderness areas in the Carson National Forest where allotment owners graze livestock to sustain our livelihoods is a key component to our existence. No access to our beloved land will make it very difficult and very unsafe. [55]

Motorized vehicles are prohibited in a wilderness having this type of restriction on our allotments will have a huge impact for the worst. Expanding wilderness adjacent to private land can limit access and use of the forest to my family and other families around the El Rito and Canjilon area. Our families have been ranching for many generations along this proposed area. [55]

El Rito Lobato West Cattle Association is opposed to the current proposal by the USFS of inventoried land with wilderness characteristics to be classified with the Carson National Forest. El Rito Lobato West Cattle Association is comprised of El Rito community members that hold long traditions of ranching, farming and sustainable agriculture practices such as range stewardship. [55]

In ending livestock grazed on allotments within the Carson National Forest play a huge role in maintaining a healthy forest for all to enjoy. [55]

El Rito Lobato West Cattle Association requests that you consider cultural sensitivity as a major role on our existence to the land that has been a huge asset to us as residents of this great nation. [55]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The Ghost Ranch portion of W31d possesses outstanding geological as well as paleontological, scenic and historical features that are consistent with desired characteristics set forth in the Wilderness Act of 1964. This area is a destination visited by people from around the world and is recognized as a significant landmark of the Southwest. [56]

The geographic proximity of this study area to developed landscapes and influences may not fully meet the criteria for inclusion as Wilderness. However, a further evaluation and analysis should be considered, which may also include consideration as a National Monument or other special designation affording it a higher level of protection and recognition. [56]

This map illustrates a revised configuration for further study that exceeds 5,000 acres and includes the outstanding features and excludes lands within the El Rito Lobato allotment, which in general do not contain the same outstanding features. [56]

CNF Response: This comment was considered during Evaluation and is addressed in the

documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Isn't this a part of the Mesa de Las Viegas Wild Horse Territory. Shouldn't it been taken out in the phase 1, or at least part of it? Shouldn't matter that it doesn't have horses. It may in the future. [46]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Bull and Camanche Canyon areas are actively used for grazing and have water impoundments, fences and other related rangeland features. [38]

The redrock formations surrounding Ghost Ranch provide spectacular scenery from the US 84 corridor and Ghost Ranch. [38]

The landscape and surrounding cultural heritage attracts artists, academics, students and tourists from around the world. [38]

Much of the views and vistas within the Study Area overlook US 84, Abiquiu Reservoir (manmade), valley rangeland, utility corridors and the many buildings comprising Ghost Ranch. While the landscape is dramatic, it doesn't meet Wilderness criteria. [38]

The primary gateway to the Study Area is from Ghost Ranch, a privately owned facility of the Presbyterian Church, open to the public. [38]

The Study Area contains a large watershed which has caused severe flash flooding of Ghost Ranch in the past. Access to this area for flood control and restoration is necessary to mitigate potential damage from future floods. [38]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

W31d - Arroyo Seco Watershed - This area identified as having wilderness character has approximately 9,500 acres of land that is within the Historical/Traditional Use boundary of the San Joaquín del Río de Chama Land Grant (See attached map San Joaquín del Río de Chama & Wilderness Character Area Overlap). The San Joaquín del Río de Chama land grant (also known as the Cañón de Chama land grant) was a community land grant established under the Spanish Crown in 1806. Although the land grant was recommended for confirmation as a community land grant in 1872 and 1880, as well as officially surveyed in 1878 by the U.S. Surveyor General's Office, it was not acted on by Congress. In 1886 a new Surveyor General George Julian reexamined the grant and recommended only confirming the private portions of the land grant located within the confines of the Chama Canyon (Cañón de Chama), however again no action was taken. In 1894 the Court of Private Land Claims confirmed the grant however no patent was issued until 1905. In 1897 the Supreme Court ruled that land grant common lands should remain in possession of the United States, and even though the San Joaquín del Río de Chama Land Grant was confirmed prior to the 1897 Supreme Court decision the patent issued was only for approximately 1,400 acres only a tiny fraction of the approximately 472,000 that had been officially surveyed and confirmed. The 1,400 acres confirmed only encompassed the private lands located in the San Joaquin del Rio de Chama

located in the Chama Canyon and did not include any of the numerous other communities such as Gallina, Chapulín, Cebolla and Cajilón. Based on this complex history there are still unresolved claims to the former common lands identified in the 1878 McElroy Survey. In addition to complex land tenure issues, the entire area identified contributes to the watershed which flows into the Piedra Lumbre patented boundaries and feeds into the Rio Chama which is utilized by many downstream traditional communities for irrigation. It is important that emphasis for management of this area is for downstream watershed health and for traditional use purposes such as grazing of livestock. This area should also be protected from any noxious uses such as large scale commercial/industrial mining or oil and gas drilling, etc that could impact both surface and ground water quality, however should not be precluded from allowing the use of mechanized equipment as a management tool for keeping the watershed healthy for downstream users and as a means of accessing livestock and livestock improvements by permittees. [57]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

- 1) NMDA Recommendation: Remove from further consideration. Below is a list of features and concerns that should exclude this polygon from further consideration in the Evaluation Phase. The reasons for excluding polygons with these specific features are found in the “Issues of Concern” section above. [3]
- 2) Evaluation Criteria Definition Matrix
 - a) Criteria 1: Apparent Naturalness
 - i) Wildfire Hazard Potential
 - (1) The eastern half of this polygon predominantly has ratings of “moderate,” “high,” and “very high.” The western half of this polygon has ratings in various areas of moderate.
 - ii) Invasive Species
 - (1) There are 0.039 acres of areas with invasive species within this polygon.
 - (a) Musk thistle – aka nodding plumeless thistle (*Carduus nutans*) – 0.039 Total Acres – Class B
 - (i) Site ID: 030202_CANU4_4 – 0.039 acres
 - iii) Constructed Features
 - (1) The Power Site Withdrawal No. 371 overlaps part of the western portion of this polygon.
 - (2) All the constructed features listed under Criteria 5 (related to constructed features for grazing allotments) detract from apparent naturalness and should be considered under Criteria 1, as well.
 - b) Criteria 2: Opportunities for Solitude or Unconfined Recreation
 - i) This polygon is less than ¼ mile from U.S. 84-P in the southwestern portion of the polygon. There is also a high concentration of roads well within ¼ mile from the northern, eastern, and southern boundaries of this polygon. Even though these roads are outside the boundary of the polygon, they will likely impact a visitor’s opportunity for solitude
 - c) Criteria 4: Unique and Outstanding Qualities
 - i) Important Watershed Features
 - (1) There are five unnamed seeps or springs within this polygon.
 - (2) There is an unnamed water body in the northwest portion of this polygon.
 - d) Criteria 5: Wilderness Characteristics Manageability
 - i) Grazing
 - (1) Allotments
 - (a) This polygon is partially within the El Rito Lobato West grazing unit, which is

utilized by eight permittees. This polygon also overlaps a portion of the Mogote grazing unit, which is utilized by 18 permittees.

- (2) Constructed Range Features
 - (a) Water Systems
 - (i) There is a multi-trough water storage tank within this polygon.
 - (ii) There is a pit water tank within this polygon.
 - (b) Fences
 - (i) A portion of the northern boundary of the polygon is created with the El Rito Lobato West Range Allotment boundary fence.
- ii) Roads and Trails
 - (1) The Yeso trail (Trail No. 50) is within this polygon.
- iii) Fire History
 - (1) An unnamed lightning-caused fire burned between 0.26 – 9.9 acres in 1992 within this polygon.
- iv) Management of Surrounding Lands
 - (1) The Power Site Withdrawal No. 371 overlaps part of the western portion of this polygon.
 - (2) A small portion of this polygon is within the Piedra Lumbre Land Grant. A large part of the eastern portion of this polygon is within the Juan Jose Lobato Land Grant.
 - (3) Part of the southern boundary of this polygon is bordered by BLM Land.
- v) Wildland Urban Interface
 - (1) A portion of the western half of this polygon is within the Canjilon Cat 4 WUI.

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Canjilon Mtn-Upper Canjilon-Upper El Rito Evaluation Area

Do not agree with your assessment of characteristics of the Mt Canjilon as a wilderness characteristics. Denial of access to the mountain for thinning, for massive wildfires, maintain a healthy water shed, herb gathering for our elders who cannot access due to your roadless designation. The wilderness designation for Mt Canjilon would have an adverse social economics for heirs in this area. [6]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Inventoried Polygon W28

sustained yield unit [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Inventoried Polygon W32

Canjilon Lakes – campgrounds and water source, fishing [17]

CNF Response: This comment was considered during Evaluation and is addressed in the

documentation of the Evaluation process and rationale.

contains a historic cabin and lookout tower [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Contains Canjilon water assoc spring and development for potable water [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Is also an inventoried roadless area [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

It is adjacent to Trout Lakes, which is a popular recreation site [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Rec sites developed exist in close proximity @ Canjilon Lakes [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

recreation – Canjilon Lakes [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Snowmobiling occurs on the entire unit [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

There are several inholdings that are adjacent to this unit [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

watershed – water comes from for community use Recreation sites developed (existing) Water assoc used area to run water lines Snowmobile, ATV use [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

Manageability is not feasible due to access and use between Trout Lakes and Canjilon Lakes [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale.

watershed – important for water supply for community of Canjilon. Water system to provide water. The water pipeline runs through there. [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

We would like to submit these criteria be included for the Wilderness Evaluation Process for The Potential Wilderness Area identified in the Inventory Map surrounding the Cebolla Trout Lakes. These criteria should be included: "Areas that are Traditional Use areas for Firewood Gathering and Herb Gathering areas will be excluded for Wilderness Consideration." The accessible areas in the location of the Cebolla Trout Lakes is a traditional use area for Aspen Wood Gathering and Osha Gathering. [35]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Evaluated Area W32a

Roaded and used by locals since European man came to the Have corduroy road in parts of the area....Does not meet criteria drop from consideration. [4]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Used by Ranchers for grazing for many generations. Very popular hunting area. There are many carved aspen trees in the area. Forest users have carved names, art work on them. It is the beginning of the El Rito Watershed. It would be hard to find 5,000 acres in this area. [7]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

We are opposed to this parcel being recommended as Wilderness in the Forest Plan. Similarly, the CDNST traverses this parcel and it is again imperative that this parcel is not recommended for Wilderness designation or that any existing trails or future potential for trail development in this area be adjusted out of a Recommended Wilderness classification. Such designation would restrict mountain bike access, essentially cutting of north-south passage via bicycle on a section of currently bike accessible trail. [8]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

(Apparent Naturalness) The naturalness of W32a is compromised and diminished by the ridge line road running from Canjilon Mountain to the North and proceeding eastward to the Vallecitos Sustained Yield Unit. This road, an RS 2477 road, was established prior to October 1976 and Has Been in "continuous use for traditional purposes" By Local Hispanics. The road is protected from closing By the 10th Circuit Court of Appeals in "San Juan County vs. US, The Utah Wilderness Alliance vs. US, and numerous other court cases. Should this road Be closed it would eliminate wood gathering, Livestock management, and Hunting. The use of this road and its permanence compromises solitude or naturalness. If This road is closed To further or promote W32a as a wilderness area, it would rob local Hispanics of an established easement from traditional uses. [57]

(Is it possible to manage area to preserve wilderness character). W32a, if managed to preserve its wilderness character, would Result in further increase of fuel Loads and increase the potential of a

catastrophic fire in the water shed. The Nutrias creek, the Terrero Baño, Edicio, Canjilon and Rito Del Medio originate in the Water Shed and provide irrigation water to farms, Mutual Domestic Water systems, and for livestock. The Mining Act of 1866 and in *New Mexico vs. US* (1978) define the primary purpose of the Forest Service as “to enhance water flow, and make water available for appropriation By private citizens.” The F.S. must manage timber, its secondary purpose, to enhance water flow. Timber has not been managed, nor will it be if W32a is established as a wilderness area. It would create and unacceptable fire hazard and threat to local communities. I object to the establishment of W32a as a wilderness area. It does not meet all the criteria established by the Forest Service. It would have the potential to threaten the existence of local communities, and would negatively impact the property rights of Northern New Mexico Hispanics. [57]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

I will use the Canjilon Lakes & Mountain region, which is designated as WSA-W32a, as an example of how our land and community are so interconnected. The extended closure of the lakes access and campground has been frustrating to many of us and the loss of thousands of dead and diseased aspens, heartbreaking. While most people understand why it is closed, this cherished community recreational resource is sorely missed. But this is only one gateway to the mountain, upper meadows and forest that lie north of the lakes. The following are examples of how and when this land is used: [38]

1. During the summer months, sheep and cattle graze the Salvador, Nutrias and Jarosa allotments from FR 274 in the east to Trout Lakes in the west. Management of this grazing is facilitated by use of truck & ATV, in addition to horses. Mending fences also frequently requires the use of chainsaws to cut fallen trees.
2. During elk season, both the FR272 and FR125 corridors are lined with campsites as hunters know the rich elk habitat of the Canjilon meadows. Motorized access to this area is common and necessary during a successful hunt. Deer, black bear, mountain lions and grouse, which inhabit the area, also attract many hunters. Many in our northern New Mexico communities rely on access to these hunts as a staple source of food.
3. Firewood harvesting occurs spring, summer and fall, and is a primary heating source for many community members.
4. Access to the bald summit of Canjilon Mountain is via several existing trails and is reached by people of all ages and by many means. Carving of initials into the sides of the old lookout shed is a local rite of passage and the inscriptions span many decades. A further restriction to access of the summit would limit who could experience the expansive views and local tradition.
5. Snowmobiling is a popular winter activity throughout much of the WSA.
6. Camping and fishing attract hundreds of people each year to the Trout Lakes and Canjilon Lakes campgrounds. With them come ATVs, motorcycles and their desire to explore. Many visitors have been coming here all their lives and are now sharing the experience with their children and grandchildren.
7. The Continental Divide Trail attracts hikers and mountain bikers who travel through the spine of the WSA. The trail is blazed at frequent intervals with bright blue paint on trees and rock cairns.
8. The WSA encompasses the headwaters to Canjilon Creek, which is a primary water source

for the village of Canjilon. Every few years, clearing of fallen trees and other obstructions is needed to maintain the stream flow in the meadows and from the tributary springs. Future access to maintain this area is critical to the watershed. [38]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

From Canjilon Mountain north to hwy 64 is about 7 peaks through which a wilderness trail could be developed. [39]

CNF Response: The wilderness recommendation process is only being applied to National Forest System lands.

We would like to submit these criteria be included for the Wilderness Evaluation Process for The Potential Wilderness Area identified in the Inventory Map surrounding the Cebolla Trout Lakes. These criteria should be included: [58]

- *“Areas that are Traditional Use areas for Firewood Gathering and Herb Gathering areas will be excluded for Wilderness Consideration.”*
- *The accessible areas in the location of the Cebolla Trout Lakes is a traditional use area for Aspen Wood Gathering and Osha Gathering.* [58]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

The Canjilon Mountain trail is advertised as a mountain bike trail on the internet all over the place. Plus you guys call it a Multiple use trail, which allows mountain bikes. Doesn't mountain bikes take away it's wilderness character? How can you not count a use that is already established and allowed? [46]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

[reply] The appropriate consideration is legally established rights and uses, like the presence of private property or some law in place that would preclude wilderness; this does not mean established management like mountain biking. Per the Forest Service's national direction, it is not appropriate for the FS to consider mountain biking in the wilderness evaluation phase of the Chapter 70 process. Rather, this is a consideration that should be considered in the analysis phase (DEIS) as a management trade off. [46]

CNF Response: This statement is accurate. The definition of wilderness character, including manageability, is as required by Chapter 70 of the planning rule directives.

The Cebolla/Nutrias watershed group met recently to discuss the USFS Carson National Forest, Forest Plan Revision, specifically, the proposed wilderness study area W32a which is located within the watershed. The Cebolla/Nutrias watershed group had been actively planning and implementing watershed restoration projects for several years now. Conservation practices that have been identified and are being implemented include erosion control, thinning projects, streambank stabilization, brush control and reseeded. The goals of our project include protecting

the community from catastrophic wildfire, reducing erosion and turbidity in the Rio Nutrias and improving rangelands used by livestock and wildlife. The local communities depend on the health of the watershed as ranchers and farmers. The USFS lands are part of the ecological, cultural and economic fabric of these communities and any policy decisions that are made greatly affect the sustainability and vitality of the local communities. [59].

The Cebolla/Nutrias watershed group is unanimous in our opposition to the proposed wilderness area within the Carson National Forest and specifically within the Cebolla/Nutrias watershed. We are requesting that you make these comments part of the official record.

The WSA- W32a area is in an unnatural state due to a legacy of fire suppression. The resultant tree density coupled with years of drought and insect damages have created conditions ripe for high intensity forest fires. A fire of this magnitude would be catastrophic for the communities that live in these forested areas. The USFS Canjillon District office has done a preliminary NEPA study for the Cebolla/Nutrias Watershed so that proposed watershed restoration projects on USFS lands can be implemented. [59].

This area has many historic, traditional and cultural uses including the firewood and wood product harvesting, livestock grazing, plant and medicinal herb gathering, hunting and fishing. [59]

The headwater streams including the Rios Cebolla, Terrorro and Nutrias originate in the proposed wilderness area, these streams feed the local irrigation systems, a wilderness area would prevent motorized access or equipment for maintaining these systems. [59].

The following allotments, Salvador, Jarosa, Nutrias, Cebolla and Canjillon, within the WSA- W32a area would be heavily impacted by the restrictions imposed by creating a wilderness area. These community allotments would endure hardships when maintaining infrastructure and implementing conservation projects. [59].

There are many manmade improvements in this watershed including dirt tanks, Burns Lake, Canjillon Lakes and Trout Lakes, developed springs, fences, and ATV trails and roads that are frequently used by the local communities for access. [59].

There are several active mining claims within the proposed wilderness area. Private landowners who have holdings within the proposed wilderness area believe that there would be increased visitation and encroachment by trespassers on private lands. [59]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Camping is popular throughout summer and hunting season. [38]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Canjilon meadows is the headwaters for Canjilon Creek [38]

Access with equipment is required to maintain streamflow to Canjilon Creek and tributary springs. This watershed is the source of community water and irrigation for the village of Canjilon. [38]

CNF Response: This comment will be carried forward and considered during the

development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Canjilon Mountain has several popular access routes for ATV's, motorcycles and snowmobiles Further access restrictions to the ridge would be difficult to manage. [38]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

...allotment fencing found throughout Study Area W32a. [38]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Extensive zone of dead/diseased Aspen between 9,800' and 10,400' [38]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Mountain biking and hiking is popular along the CDT [38]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Firewood cutting/hauling is a staple resource for people in surrounding communities [38]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Cattle and sheep grazing within the 3 allotments rely on this mountain habitat [38]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Snowmobiling is a popular winter recreation throughout Study Area W32a [38]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

A large elk population in addition to black bear, mountain lion, deer, turkey and grouse make this area a hunting destination. A restriction on motorized vehicles during hunting season would be difficult to enforce. [38]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

...dead/down trees and dense canopy. An uncontained wildfire would have devastating effects to

the watershed critical to the lakes and community of Canjilon [38]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Ridgeline trail is used by hikers, horses, atv's & motorcycles. It provides good vantage points to spot and track livestock and game to the west [38]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Past logging/fire & restoration 320 acres [38]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Portion within Jarosa Allotment: 3,370 acres (54% of Allotment) [38]

Portion within Nutrias Allotment: 835 acres (21% of Allotment) [38]

Portion within Salvador Allotment: 3,170 acres (17% of Allotment) [38]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

W32a - Canjilon Mountain - The area identified as having wilderness character is adjacent to the patented boundaries of the Tierra Amarilla Land Grant and the Traditional/Historic Use Boundaries of the San Joaquín del Río de Chama Land Grant. Both Land Grants are active and recognized by the New Mexico Land Grant Council as a being organized as political subdivisions of the State. The area identified in W32a includes approximately 5,600 acres of land that contributes to the watershed and directly serves the local communities of Canjilon, Cebolla and Las Nutrias (See attached map San Joaquín del Río de Chama Watersheds and Wilderness Character Areas). These communities rely on the stream flow, to which this area contributes, for drinking water, irrigating crops and fields, watering livestock and for subsistence fishing. The identification and management of this area as a potential Wilderness could severely impact the U.S. Forest Service's ability to manage the area, particularly through the use of mechanized equipment, to ensure watershed health and protect it from catastrophic wildfire. The active management for both the health of the watershed and to mitigate the risk of catastrophic wildfire is essential for the Canjilon Mountain, in order to protect the adjacent historical communities of Canjilon, Cebolleta and Las Nutrias and those communities' traditional way of life. The area should be protected from any noxious activities such as large-scale industrial/commercial mining or oil and gas drilling etc., that could impact both surface and ground water quality, however should not be precluded from allowing the use of mechanized equipment as: a management tool for keeping the forest healthy; a means of accessing livestock and livestock improvements by permittees; and as a means of harvesting wood and other resources for traditional use purposes by the local community (i.e. fuelwood and building material). [60]

CNF Response: This comment will be carried forward and considered during the Analysis of lands with Wilderness character. This comment may also be appropriate during the development of plan components.

- 1) NMDA Recommendation: Remove from further consideration. Below is a list of features and concerns that should exclude this polygon from further consideration in the Evaluation Phase. The reasons for excluding polygons with these specific features are found in the “Issues of Concern” section above. [3]
- 2) Evaluation Criteria Definition Matrix
 - a) Criteria 1: Apparent Naturalness
 - i) Wildfire Hazard Potential
 - (1) Much of this polygon has a rating of “moderate” and some areas have a rating of “high.”
 - ii) Invasive Species
 - (1) There are 0.5 acres of areas with invasive species within this polygon.
 - (a) Butter and eggs – aka yellow toadflax - (*Linaria vulgaris*) – 0.5 Total Acres - Class C
 - (i) Site ID: 030201_LIVU_JAROSA – 0.5 acres
 - iii) Constructed Features – Range Improvements
 - (1) All the constructed features listed under Criteria 5 (related to constructed features for grazing allotments) detract from apparent naturalness and should be considered under Criteria 1, as well.
 - b) Criteria 4: Unique and Outstanding Qualities
 - i) Important Watershed Features
 - (1) There are over twenty seeps or springs within this polygon, which supply water to the area.
 - (2) The Rio Nutrias, Canjilon Creek, Canada Chacon, and Jaroso Creek perennial streams run within this polygon.
 - (3) There are about twenty unnamed water bodies within this polygon as well as the Cold Lake water body.
 - c) Criteria 5: Wilderness Characteristics Manageability
 - i) Impaired Surface Waters
 - (1) This polygon contains two impaired surface waters that will need access in order to restore them: Rio Nutrias and the Canjilon Creek.
 - ii) Grazing
 - (1) Allotments
 - (a) The northern portion of this polygon overlaps the East Jarosa and West Jarosa allotments, which is utilized by one permittee. The western portion of this polygon overlaps the Nutrias Allotment, which is utilized by one permittee. The southeastern portion of this polygon overlaps the Salvador Complex pasture.
 - (b) Also within this polygon are several pastures: the West Jarosa pasture, the East Jarosa pasture, the Arriba pasture, the Vega Paz pasture, the Pelado pasture, and the Minita pasture.
 - (c) Constructed Features There is a wire gate in the northwest quadrant of this polygon.
 - (d) The Sipapu water storage tank is in the middle of the eastern half of this polygon.
 - (e) There is an interior allotment fence near the northern portion of this polygon and one near the western boundary. There is a range allotment boundary fence bisecting this allotment – a portion for which the permittee is responsible. There is also a range allotment boundary fence in the southwestern corner of the polygon that is maintained by the Cebolla permittee(s). There are several allotment fences for the Canjilon Lake area in the southern portion of this polygon.
 - iii) Roads and Trails

- (1) There are three roads of varying lengths located within this polygon: Route No. 274D, Route No. 274BT1; and Route No. UD1_508.
- (2) There is one long loop trail within this polygon: Canjilon Mountain Trail No. 54.
- iv) Fire History
 - (1) The lightning-caused Trout Lakes Fire burned between 0 – 0.25 acres within this polygon in 2006.
- v) Management of Surrounding Lands
 - (1) The north western portion of this polygon is adjacent to the Trout Lakes Recreation Area, which is developed. The southern-most portion of this polygon is adjacent to the Canjilon Lakes and Canjilon Creek Campground, which are also developed. The northern boundary is on the border of the Carson National Forest boundary and is adjacent to non-USFS land.
- vi) WUI
 - (1) The southern portion of this polygon is within the Canjilon Cat 4 WUI. [3]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Comanche East Evaluation Area

CNF Response: No comments specific to this area.

El Rito-Lobato Evaluation Area

Inventoried Polygon Wxs671ADD

Although I'm not positive, I believe this small parcel of land may be directly adjacent to a BLM Taos Field Office LWC. If that's the case, then it should be included in your inventory. [35]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Inventoried Polygon W26

major powerline going through this unit no. of US 84 [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Manageability is very difficult due to access and topography: somewhat rocky, lots of rough terrain [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Popular flagstone area with hand and mechanical [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Rio Chama Wilderness Accompaniments-Echo Amphitheater Evaluation Area

Inventoried Area W6

existing recreation sites. Need access to pvt land over properties [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

hunting and fuelwood / grazing / gathering area (electric line) Near Meso de Las Viejas, Echo ampi., private ranches [17]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational.

Evaluated Area CrW5b

- 1) NMDA Recommendation: Remove from further consideration. Below is a list of features and concerns that should exclude this polygon from further consideration in the Evaluation Phase. The reasons for excluding polygons with these specific features are found in the “Issues of Concern” section above. [3]
- 2) Evaluation Criteria Definition Matrix
 - a) Criteria 1: Apparent Naturalness
 - i) Wildfire Hazard Potential
 - (1) Most of this polygon has a rating of “moderate.”
 - b) Criteria 4: Unique and Outstanding Qualities
 - i) Important Watershed Features
 - (1) The Rio Cebolla is within this polygon.
 - c) Criteria 5: Wilderness Characteristics Manageability
 - i) Impaired Surface Waters
 - (1) This polygon contains one impaired surface water that will need access in order to restore it: Rio Cebolla.
 - ii) Grazing
 - (1) The entire polygon is within the Cebolla Allotment, which is utilized by 11 grazing permittees.
 - iii) Management of surrounding lands
 - (1) The northern and western boundary of this polygon is adjacent to BLM land.
 - (2) The eastern boundary is adjacent to the Chama River Canyon Wilderness.

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rational. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Evaluated Area CrW6c

Isn't this a part of the Mesa Montosa Wild Horse Territory. Shouldn't it been taken out in the phase 1? Shouldn't matter that it doesn't have horses. It may in the future. [46]

CNF Response: This comment will be carried forward and considered during the development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

- 1) NMDA Recommendation: Remove from further consideration. Below is a list of features and concerns that should exclude this polygon from further consideration in the Evaluation Phase. The reasons for excluding polygons with these specific features are found in the “Issues of Concern” section above. [3]
- 2) Evaluation Criteria Definition Matrix
 - a) Criteria 1: Apparent Naturalness
 - i) Wildfire Hazard Potential
 - (1) The entirety of this polygon has a rating of “moderate.”
 - ii) Constructed Features
 - (1) All the constructed features listed under Criteria 5 (related to constructed features for grazing allotments) detract from apparent naturalness and should be considered under Criteria 1, as well.
 - b) Criteria 2: Opportunities for Solitude or Unconfined Recreation
 - i) This polygon is less than 1/10 mile away from a road (Route No. 145N3) that will likely impact a visitor’s opportunity for solitude.
 - c) Criteria 4: Unique and Outstanding Qualities
 - i) Important Watershed Features
 - (1) The Huckaby Canyon intermittent stream is within this polygon.
 - d) Criteria 5: Wilderness Characteristics Manageability
 - i) Grazing
 - (1) Allotments
 - (a) The entire polygon is within the Pvt Land Allotment.
 - (2) Constructed Features
 - (a) The eastern boundary of this polygon is created by a range allotment boundary fence.
 - ii) Management of surrounding lands
 - (1) The western boundary of this polygon bordered by the Chama River Canyon Wilderness and the eastern boundary is general USFS land. [3]

CNF Response: This comment was considered during Evaluation and is addressed in the documentation of the Evaluation process and rationale. This comment will also be carried forward and considered during the Development of alternatives (including a proposed Wilderness Recommendation) and/or the effects analysis of alternatives.

Jicarilla Ranger District

CNF Response: No comments specific to this area.